3.4 Individuals

Comment Set D1 – Mark Goddard

Email: Easley Renewable Energy Project

From: Mark Goddard <beatingdrums@msn.com>
Sent: Monday, February 12, 2024 7:26 PM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: RE: Automatic reply: IP Easley, LLC Project CUP220021 Scoping Proposal Comment Submission / Mark Goddard

re: previous, related correspondence

Mr. Wheeler,

Immediately below, please see an 'updated/revised' version of my recent 'IP Easley Scoping Proposal Comment Submission' document, made earlier today, which is referenced by your related automated reply's corresponding "Original Message" description, below.

I have made some unanticipated, minor changes, which I would like reflected in this 'final' proposal comment submission to you/your Office.

Please disregard the earlier document version and consider the most recent, proposal comment submission document, found below, to be the final submission for this, referenced scoping proposal comment.

Thank you for your patience with this bit of back-tracking, Mr. Wheeler.

Mark Goddard

*** Revised, IP Easley Scoping Proposal Comment Submission / Final Document / Mark Goddard** (Submitted document begins with the opening text header - "**Scoping Proposal Comment Submitted By:**", immediately below)**:**

Scoping Proposal Comment Submitted By:

Name: Goddard, Mark
Address:44001 Shadow Way, Desert Center, California 92239
Email Address: beatingdrums@msn.com
Submission Date: February 12, 2024

To the Attention of the Riverside County Planning Department:

Attn: Tim Wheeler, Project Planner
4080 Lemon Street, 12th Floor
PO Box 1409 Riverside, CA 92502
(951) 955-0606
email: TWheeler@rivco.org

Project: Intersect Power, LLC / IP Subsidiary: Easley, LLC Solar Plant Project

Conditional Use Permit No. CUP220021

Public Use Permit No. PUP230002
Variance No. VAR230003
Development Agreement No. DA2200016

Comment Set D1 – Mark Goddard (continued)

Project Location: "2 miles north of Desert Center, Riverside County, CA; moreover northeast of Highway 177/Orion Road and north of Oasis Road, east of Kaiser Road, south of Investor Avenue."

Topic:

Scoping Comment, Proposing Additional, Alternative Mitigation Measures, Requiring Scientific Research Studies which have Never Previously Been Performed and which are Beyond Those Proposed/Included in the IP Easley Project's Draft EIR.

Dear Mr. Wheeler,

A direct reply to this email, as opposed to a separate, automated reply from you/your Office, will assist me in confirming that this, specific, correspondence was delivered to you successfully and will be greatly appreciated.

The following, formal scoping submission is intended as a prospective catalyst for Agency/scientific follow-up, research/studies related to the pertinent, highly concerning content . . .

Related YouTube Video Coverage (which includes a reference to the significant role that solar facility development can play, including university research credits/sourcing): D1-1

Link: https://youtu.be/kggpgKea0lk ;

Problem:

A Pervasive Desert Fungal Presence, Exacerbated by Local Solar Facility Development, Most Recently by, Potentially, the Above Referenced, Proposed IP Easley Project: CUP220021 / DA2200016, which has the capacity to Pose an Extreme, Mortal, Threat to All Regional Wildlife/ Biological Organisms, Including Human Beings:

A Fungus which, Atypically, Thrives in Dry/Arid Conditions: "Coccidoides immitis" (pronounced "cock-si-doi-tees").

• There is an infectious disease associated with this fungus, known as "Coccidiodomycosis", otherwise known as "Valley Fever", or "Desert Rheumatism". A disease which makes a serious, broad impact which is often underestimated.

• Respectively and in combination, symptoms of the infection include achiness, fever, fatigue, fungal pneumonia, chronic lung disease, skin abscesses and meningitis. The fungus can and has, not infrequently, progressively digested living human internal organs, as well as the spinal cord, over the course of several months and(or) years. The fungus has the copiously and reliably, scientifically/medically documented capacity to digest 'any' living tissue.

Consequently, for any of those reasons, the disease can 'easily' prove fatal.

• 97% of reported cases are in *California and Arizona. Desert rodent species often carry the fungus. Once the infected rodents' remains have decomposed, returning to the sand/ground surface, the remaining, contaminated dust particulates become airborne, with even a minor breeze, distributing the toxic fungus, progressively compounding its presence and increasing the threat to human life, as well as the lives of animals and insects. In addition to effecting proximal/local areas, those toxic fungal particulates can and do drift for tens, if not hundreds of miles.

Comment Set D1 – Mark Goddard (continued)

D1-1 (cont'd)

***** Please Note: Often, Desert Center has wind gusts which exceed '80 mph', including massive dust storms, worsened by ground surfaces which have been persistently and aggressively disrupted by surrounding Solar Facility development projects.

****** Between 2013 and 2019, there has been a *159%* increase in cases.

These concerns have also been brought to the attention of two prominent, respective University, environmental research Departments, which have expressed a strong interest in pursuing the subject.

It is an understatement to assert that this, very understandable, statistically supported medical/human concern warrants assiduous, scientific research follow-up.

. . . Many Children live in our Community.

Thank you for your attention and consideration in this matter, Mr. Wheeler

Mark Goddard

-------- Original message --------

From: "Wheeler, Timothy" <TWHEELER@RIVCO.ORG>
Date: 2/12/24 3:59 PM (GMT-08:00)
To: Mark Goddard <beatingdrums@msn.com>
Subject: Automatic reply: IP Easley, LLC Project CUP220021 Scoping Proposal Comment Submission / Mark Goddard

I will be out of the office Friday February 9, 2024 thru Monday February 12, 2024 for my 9/80 schedule & President's Day Holiday respectively. I will return to the office on Tuesday February 13, 2024 at 8 am. I will return phone calls and emails, to the best of my ability, when I return. Thank you in advance for your patience.

Responses to Comment Set D1 – Mark Goddard

D1-1 The commenter provides a link to a YouTube video called "A desert fungus that infects humans is spreading" about the fungus, *Coccidoides immitis*, which causes the disease "Valley Fever" or "Desert Rheumatism." The commenter expresses concerns that the local solar development will exacerbate the disease for wildlife/biological organisms, including human beings and children. In addition, the commenter states that Desert Center has wind gusts which exceed '80 mph', including dust storms, worsened by ground surfaces which have been disturbed by surrounding Solar Facility development .

Please see General Response GR-2, Fugitive Dust Control and Site Preparation, for information on Valley Fever trends and treatment of "high wind" conditions in SCAQMD Rule 403. The Final EIR includes an additional component for MM AQ-1 to delineate contingency dust control measures during "high wind" conditions.

See also Response to Comment B3-18 for additional details on Valley Fever in Riverside County.

Comment Set D2 – Julie and Lars Anderson

Email: Easley Renewable Energy Project

From: LARS ANDERSON <larsjulie@comcast.net>
Sent: Thursday, February 15, 2024 6:25 AM
To: Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; Dist2@Rivco.org; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>; Gonzalez, Guillermo <GuiGonzalez@Rivco.org>; Aceves, Pedro <PAceves@Rivco.org>; Hernandez, Steven <SAHERNAN@RIVCO.ORG>; shayra.hernandez@mail.house.gov
Cc: Perez, Esmeralda <ESperez@rivco.org>; mcarrington81@gmail.com; fangel@angellaw.com; Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Solar Development at Lake Tamarisk/Desert Center CA

Dear Supervisors,

In the government's haste to put renewable energy facilities in the form of solar installations, they have neglected to include provisions to safeguard communities like Lake Tamarisk in Desert Center. **D2-1**

The Lake Tamarisk/Desert Center area is being used for large-scale solar installations and our community in particular is ground zero because of its proximity to the transmission substations.

There is a permanent community of **about 80 homes here that includes approximately 25 children who attend school at the site of the former Kaiser Eagle Mountain mine**. There is also a 150-lot mobile home park with a population swelling to approximately 2000 during winter. We chose this area because of the once pristine desert, the proximity to ATV trails, the peace and quiet, the unspoiled wilderness, and thousands of migrating birds.

No one knows the long-term effects of large fields of solar panels on human populations. But we do know that acres of panels raise the ambient temperature by 5-7 degrees F, which, in an area where summer temperatures reach 125, is a significant increase. There are also major health risks associated with constructing these facilities because of the disturbance of the soil and the release of fungal spores into the atmosphere. **D2-2**

We are very concerned about water. If this project is approved, it will take our Ancient Aquifer below our Sustainable Annual Yield (see above link, document pg. 20-28) We know our aquifer is in severe overdraft and this will degrade our drinking water quality based on recent studies and local experience. Water for Clean Energy should come from sustainable sources. LA's allotment from the Colorado River Canal should be used for LA Solar instead of our aquifer. **D2-3**

Intersect Power, who was just awarded "Environmental Development Leadership Project" status for the Easley Solar Project, just installed one of these facilities approximately one-third of a mile from our community without any consultation with the people affected by it. The current design of the Easley Project places panels 650' on two additional sides of our community. Their answer to our concerns about blinding glare from the panels in the afternoons and our views being ruined was to offer subsidies for shades on our decks and blinds in our homes. **D2-4**

Comment Set D2 – Julie and Lars Anderson (continued)

This company is not interested in working with the community. They intend to build the facility as cheaply as possible, get their government incentives, and get out. **D2-4 (cont'd)**

The Desert Center Area Plan, revised in 2021, under DCAP 2.3 sets out "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." **D2-5**

Our supervisors are responsible for ensuring the vision set out in the Desert Center Area Plan, a portion of the Riverside County General **Plan,** is followed.

We realize that we cannot stop these facilities altogether. All we ask for is respect from the County, BLM, and the companies building Solar, by keeping these installations a reasonable 1-mile or more distance from our homes and not raping our resources. **PLEASE DENY THE EASLEY SOLAR PROJECT AS CURRENTLY PLANNED.**

Please follow the minimum requirements we have asked for in the "Respect Lake Tamarisk Alternative" to protect our Community.

Regards,
Julie and Lars Anderson

Responses to Comment Set D2 – Julie and Lars Anderson

D2-1 The commenters describe the Lake Tamarisk/Desert Center area and express concern about the long-term effects of utility scale solar projects on human populations and that acres of panels raise the ambient temperature by 5 to 7 degrees Fahrenheit in an already hot area.

The commenter's description of the Lake Tamarisk/Desert Center is consistent with the environmental setting descriptions in the Draft EIR.

Refer to General Response GR-6 regarding the heat island effect. Heat island effects are analyzed in the Partially Recirculated Draft EIR's revised and recirculated analysis of biological resources. Please refer to the revised analysis at Section 3.5 of the Partially Recirculated Draft EIR and to General Response GR-1.

D2-2 The commenters express concern about the health risks associated with soil disturbance from solar construction releasing fungal spores into the atmosphere.

Please see General Response GR-2. See also Response to Comment B3-18 for additional details on Valley Fever in Riverside County.

D2-3 The commenter expresses concern that development of the Project will impact groundwater. The analysis of Hydrology and Water Quality has been revised and recirculated in the Partially Recirculated Draft EIR. Please refer to the revised analysis at Section 3.11 of the Partially Recirculated Draft EIR and to General Response GR-1.

The comment is similar to Comments D3-3 and D6-1. Please see General Response GR-3.

D2-4 The commenters state that Intersect Power just installed a solar facility approximately one-third of a mile from the community without any consultation with the people affected by it, and that the proposed Project would place panels 650 feet on two additional sides of the Lake Tamarisk community. The commenters express concerns regarding aesthetic impacts.

The commenters' opposition to the proposed Project is noted.

The commenter references the Oberon Renewable Energy Project, which completed construction in fall 2023. Prior to its approval by the by the Colorado River Basin Regional Water Quality Control Board and the U.S. Bureau of Land Management (BLM), the Oberon Project underwent environmental reviews under the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA), respectively. The Oberon environmental review processes and project approvals are separate from this Easley Project CEQA process, and Riverside County has no jurisdiction over the Oberon Project. However, the Oberon Project is included as a cumulative project and analyzed accordingly throughout the EIR.

Additionally, the analysis of Project Alternatives and Aesthetics has been revised and recirculated in the Partially Recirculated Draft EIR. Please refer to the revised analysis at Chapters 2 and 5 (Alternatives) and Section 3.2 (Aesthetics) of the Partially Recirculated Draft EIR and to General Response GR-1.

D2-5 The commenters cite Desert Center Area Plan (DCAP) 2.3 and request that the Riverside County Supervisors follow the vision set out in the DCAP.

Table 3.2-2 (Consistency with Regulatory Plans, Policies, and Standards) in Section 3.2 (Aesthetics) of the Draft EIR describes the Project's consistency with applicable aesthetics regulatory requirements, including DCAP 2.3. The analysis of Aesthetics has been revised and recirculated in the Partially Recirculated Draft EIR. Please refer to the revised analysis at Section 3.2 of the Partially

Recirculated Draft EIR and to General Response GR-1. Please also refer to Chapters 2 and 5 of the Partially Recirculated Draft EIR regarding analysis of Project Alternatives.

Please see Response to Comment D6-1 regarding the overall consistency analysis with the DCAP.

The commenters' support for a 1-mile or more buffer and opposition to the proposed Project are noted.

Comment Set D3 – Patti Cockcroft and Ken Stamp

Email: Easley Renewable Energy Project

From: Patti Cockcroft <patti.cockcroft@gmail.com>
Sent: Tuesday, February 13, 2024 2:05 PM
To: Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; Dist2@rivco.org; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>; Gonzalez, Guillermo <GuiGonzalez@Rivco.org>; Aceves, Pedro <PAceves@Rivco.org>; Hernandez, Steven <SAHERNAN@RIVCO.ORG>; shayra.hernandez@mail.house.gov
Cc: Perez, Esmeralda <ESperez@rivco.org>; mcarrington81@gmail.com; fangel@angellaw.com; Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: Solar Development at Lake Tamarisk Desert Center, CA

Dear Supervisors,

In the government's haste to put renewable energy facilities in the form of solar installations in place they neglected to include provisions to safeguard communities in the affected areas. Our home in Lake Tamarisk at Desert Center is located halfway between Palm Springs and the Arizona border. This whole area has been designated the ideal spot for large-scale solar installations and our community in particular is ground zero because of its proximity to the transmission substations. **D3-1**

There is a permanent community here that includes about 80 homes with approximately 25 children who attend school at the site of the former Kaiser Eagle Mountain mine. There is also a 145-lot mobile home park, and the area swells to approximately 2,000 people during the winter with snowbirds who choose this area because of the once-pristine desert and proximity to ATV trails through fields of desert wildflowers and unspoiled wilderness.

We have two lakes that support a large number of migratory birds and on our rides over the years we have sighted a number of desert tortoises. We know that bird populations are extremely vulnerable to the acres of reflective panels, mistaking them for lakes, and they are not able to correct their course in time to save their lives. Does the environmental concern not extend to these populations?

No one knows the long-term effects of large fields of solar panels on human populations. But we do know that acres of panels raise the ambient temperature by 5-7 degrees F, which, in an area where summer temperatures reach 125, is a significant increase. **D3-2**

There are also major health risks associated with the construction of these facilities because of the disturbance of the soil and the release of fungal spores into the atmosphere.

I, myself, spent eight months after my return home last year dealing with the effects of this dust, finally being tested for Valley Fever, which is a legitimate concern in this area.

The water being used to mitigate the dust is being drawn from our aquifer. During the past couple of years of solar construction the output from the aquifer exceeded the input, which, obviously, is not a sustainable situation. **D3-3**

Comment Set D3 – Patti Cockcroft and Ken Stamp (continued)

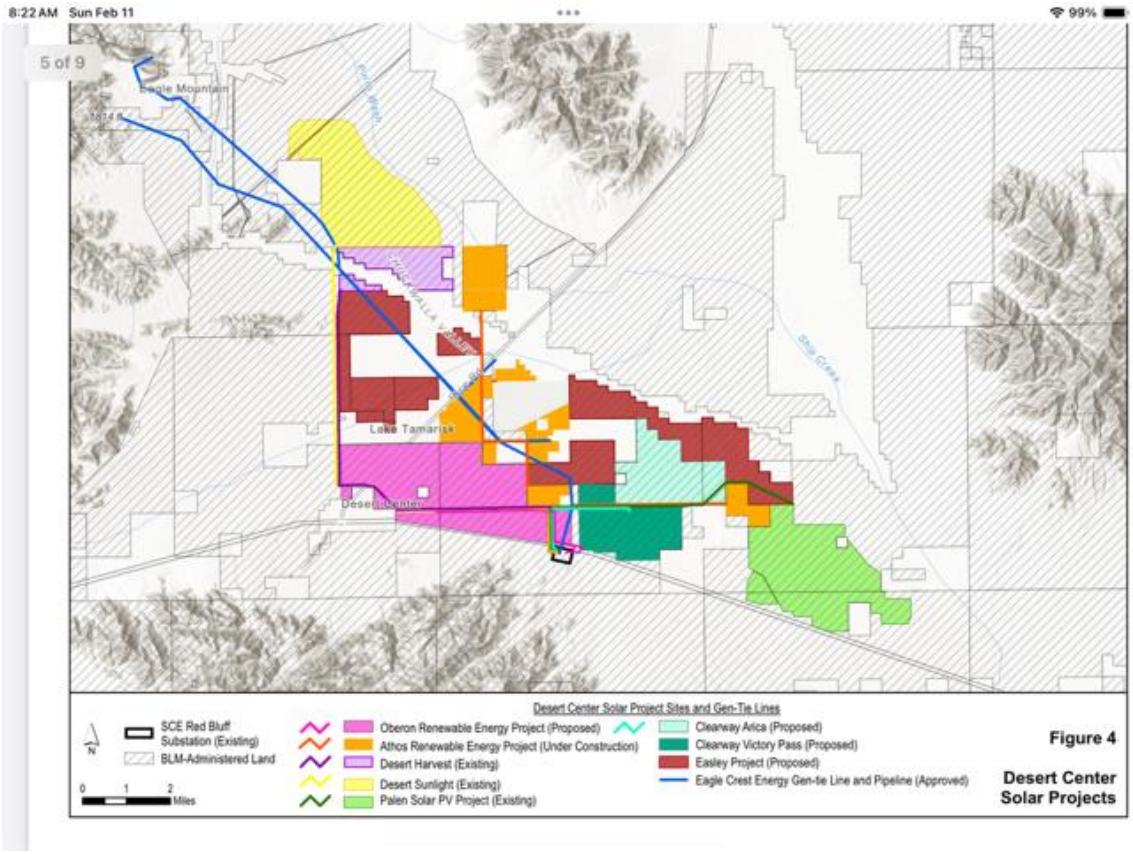
There are alternatives to this - one being to utilize water from the aqueduct that flows from the Colorado River to LA and runs approximately 8 or 9 miles to the north of us. **D3-3 (cont'd)**

Intersect Power, who was just awarded "Environmental Development Leadership Project" status for the Easley Solar Project, installed one of these facilities approximately one-third of a mile from our community without any consultation with the people affected by it. The current design of the Easley Project places panels 650' on two additional sides of our community. And their answer to our concerns about our views being marred by these panels was to offer to subsidize our purchase of shades on our decks. **D3-4**

This company is not interested in working with the community. Their intent is to build the facility as cheaply as they can, get their government incentives and get out.

The Desert Center Area Plan, revised in 2021, under DCAP 2.3 sets out "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." **D3-5**

The following is a map showing existing and proposed solar facilities in the Desert Center area. Does this look like an area that is 'visually enhanced and not degraded' to you?



Our supervisors are responsible for ensuring the vision set out in the Desert Center Area Plan, a portion of the Riverside County General Plan, is followed.

Comment Set D3 – Patti Cockcroft and Ken Stamp (continued)

We realize that we cannot stop these facilities altogether. All we ask for is respect from the County, the BLM and the companies building solar by keeping these installations a reasonable 1-mile distance from our homes and not raping our resources. **D3-5 (cont'd)**

Thank you for your help by following the minimum requirements we have asked for to protect our community.

Yours truly,
Patti Cockcroft
Ken Stamp
#15 - 26250 Parkview Drive, Desert Center

Sent from my iPad

Responses to Comment Set D3 – Patti Cockcroft and Ken Stamp

D3-1 The commenter describes the Lake Tamarisk/Desert Center area and express concern about impacts to migratory birds and the lake effect. The analysis of Biological Resources has been revised and recirculated in the Partially Recirculated Draft EIR. Please refer to the revised analysis at Section 3.5 of the Partially Recirculated Draft EIR and to General Response GR-1.

Please see Response to Comment D5-71 regarding impacts to birds. Refer to General Response GR-7 regarding the lake effect.

D3-2 The commenters express concerns about the long-term effects of utility scale solar projects on human populations and asserts that acres of panels raise the ambient temperature by 5 to 7 degrees Fahrenheit in an already hot area. The commenters also express concerns about the health risks associated with soil disturbance from solar construction releasing fungal spores into the atmosphere.

Please see General Response GR-6 regarding the "Heat Island Effect." Heat island effects are analyzed in the Partially Recirculated Draft EIR's revised and recirculated analysis of biological resources. Please refer to the revised analysis at Section 3.5 of the Partially Recirculated Draft EIR and to General Response GR-1.

Please see General Response GR-2 regarding Valley Fever and dust control. See also Response to Comment B3-18 for additional details on Valley Fever in Riverside County. See also Responses to Comments D1-1 and B9-2 regarding human health impacts.

D3-3 The commenters express concern that the water being used to mitigate the dust is being drawn from the local aquifer, and during the past couple of years of solar construction the output from the aquifer exceeded the input. The commenters suggest utilizing water from the aqueduct that flows from the Colorado River to Los Angeles. The analysis of Hydrology and Water Quality has been revised and recirculated in the Partially Recirculated Draft EIR. Please refer to the revised analysis at Section 3.11 of the Partially Recirculated Draft EIR and to General Response GR-1.

Please see Response to Comment D2-3, which is a similar comment, and General Response GR-3.

D3-4 Please see Response to Comment D2-4, which is a similar comment.

D3-5 The commenters cite Desert Center Area Plan (DCAP) 2.3 and request that the Riverside County Supervisors follow the vision set out in the DCAP. The commenter includes a figure that shows the application areas of existing and proposed solar facilities in the Desert Center area, which is consistent with the cumulative scenario described in Section 3.1.2 (Cumulative Impact Scenario) of the Draft EIR. Please see Response to Comment D2-5 regarding DCAP 2.3.

The commenters' support for a minimum 1-mile buffer of solar facilities from the community is noted.

Comment Set D4 – Bob and Tracy Brooks

Email: Easley Renewable Energy Project

From: Bob Brooks <bbbrks@gmail.com>
Sent: Thursday, February 22, 2024 9:33 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Subject: IP Easley Solar Plant Project (CUP220021)

Dear Mr. Wheeler,

I previously copied you on my email to the county supervisors concerning the IP Easley Solar Plant Project (CUP220021) but it has come to my attention that I should have addressed my comments and concerns to yourself in order to be included during the public comment period. **D4-1**

We have a home in Lake Tamarisk Desert Resort and have been keeping up with the nearby industrial solar development activities. The currently proposed IP Easley Solar Plan is unacceptable to the residents of Lake Tamarisk. I have read through the Draft Environmental Impact Report (EIR) and have several concerns regarding poor assumptions and infeasibility claims made throughout the report and with the proposed siting of solar panels in close proximity to Lake Tamarisk. In the interest of brevity I will not address each concern with the report as they will be listed in our comprehensive draft EIR reply.

I do support the overall goals and objectives of renewable energy projects to help reduce greenhouse gas emissions. However, project designs must take into account the negative impact on those who reside in close proximity. Unfortunately the currently proposed Easley Solar Plan fails on that point.

We do offer minimum alternative solutions that are fair and reasonable for both Easley and Riverside County. These alternative solutions include dust mitigation, water aquifer conservation, visual screening and 1 mile setback buffer zones. The detailed list, “Respect Lake Tamarisk Alternative”, is attached for your reference.

The Desert Center Area Plan, revised in 2021, under DCAP 2.3 spells out the objective to “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”. This objective typifies what the residents of Lake Tamarisk are asking you, the Riverside County supervisors, to abide by when making your decision concerning the approval of the project as drafted.

IP Easley, LLC and Interesect Power, LLC apparently have deep pockets to be able to make significant campaign contributions to perhaps further their agenda and be able to disregard or trivialize our needs.. Conversely, Lake Tamarisk is a 55 plus resident

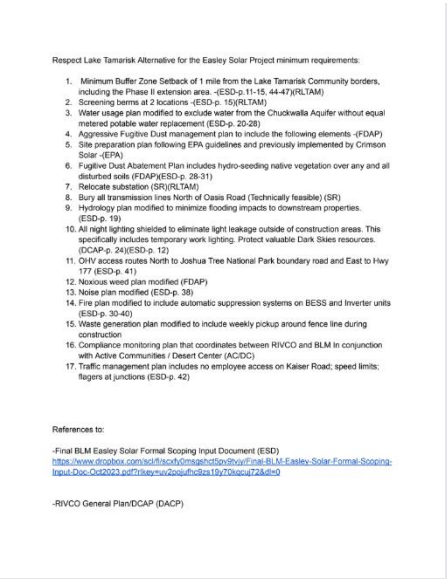
Comment Set D4 – Bob and Tracy Brooks (continued)

owned community with primarily fixed income retirees. The primary goal of IP Easley, LLC is the almighty dollar and how to make the most by doing the least, regardless of who it harms. We feel like a bit of David and Goliath regarding our pleas to hear our concerns and act on them. **D4-1 (cont'd)**

We trust that the Riverside County Supervisors will vote to require a redesign which results in providing a reasonable quality of life for the residents of Lake Tamarisk and the surrounding community in accordance with the DCAP.

Respectfully,

Bob and Tracy Brooks



Respect Lake Tamarisk Alternative for the Easley Solar Project minimum requirements:

1. Minimum Buffer Zone Setback of 1 mile from the Lake Tamarisk Community borders, including the Phase II extension area. -(ESD-p.11-15, 44-47)(RLTAM)
2. Screening berms at 2 locations -(ESD-p. 15)(RLTAM)
3. Water usage plan modified to exclude water from the Chuckwalla Aquifer without equal metered potable water replacement (ESD-p. 20-28)
4. Aggressive Fugitive Dust management plan to include the following elements -(FDAP)
5. Site preparation plan following EPA guidelines and previously implemented by Crimson Solar -(EPA)
6. Fugitive Dust Abatement Plan includes hydro-seeding native vegetation over any and all disturbed soils (FDAP)(ESD-p. 28-31)
7. Relocate substation (SR)(RLTAM)
8. Bury all transmission lines North of Oasis Road (Technically feasible) (SR)
9. Hydrology plan modified to minimize flooding impacts to downstream properties. (ESD-p. 19)
10. All night lighting shielded to eliminate light leakage outside of construction areas. This specifically includes temporary work lighting. Protect valuable Dark Skies resources. (DCAP-p. 24)(ESD-p. 12)
11. OHV access routes North to Joshua Tree National Park boundary road and East to Hwy 177 (ESD-p. 41)
12. Noxious weed plan modified (FDAP)
13. Noise plan modified (ESD-p. 38)
14. Fire plan modified to include automatic suppression systems on BESS and Inverter units (ESD-p. 30-40)
15. Waste generation plan modified to include weekly pickup around fence line during construction
16. Compliance monitoring plan that coordinates between RIVCO and BLM in conjunction with Active Communities / Desert Center (AC/DC)
17. Traffic management plan includes no employee access on Kaiser Road; speed limits; flagers at junctions (ESD-p. 42)

References to:

-Final BLM Easley Solar Formal Scoping Input Document (ESD)
https://www.dropbox.com/scl/fi/scxfy0msgshct5ov9tvjv/Final-BLM-Easley-Solar-Formal-Scoping-Input-Doc-Oct2023.pdf?rlkey=uv2pojufhc8zs19y70kqcuj72&dl=0

-RIVCO General Plan/DCAP (DACP)

"Respect Lake Tamarisk Alternative".pdf
dropbox.com

D4-2

Comment Set D4 – Bob and Tracy Brooks (continued)

Respect Lake Tamarisk Alternative for the Easley Solar Project minimum requirements:

1. Minimum Buffer Zone Setback of 1 mile from the Lake Tamarisk Community borders, including the Phase II extension area. -(ESD-p.11-15, 44-47)(RLTAM)
2. Screening berms at 2 locations -(ESD-p. 15)(RLTAM)
3. Water usage plan modified to exclude water from the Chuckwalla Aquifer without equal metered potable water replacement (ESD-p. 20-28)
4. Aggressive Fugitive Dust management plan to include the following elements -(FDAP)
5. Site preparation plan following EPA guidelines and previously implemented by Crimson Solar -(EPA)
6. Fugitive Dust Abatement Plan includes hydro-seeding native vegetation over any and all disturbed soils (FDAP)(ESD-p. 28-31)
7. Relocate substation (SR)(RLTAM)
8. Bury all transmission lines North of Oasis Road (Technically feasible) (SR)
9. Hydrology plan modified to minimize flooding impacts to downstream properties. (ESD-p. 19)
10. All night lighting shielded to eliminate light leakage outside of construction areas. This specifically includes temporary work lighting. Protect valuable Dark Skies resources. (DCAP-p. 24)(ESD-p. 12)
11. OHV access routes North to Joshua Tree National Park boundary road and East to Hwy 177 (ESD-p. 41)
12. Noxious weed plan modified (FDAP)
13. Noise plan modified (ESD-p. 38)
14. Fire plan modified to include automatic suppression systems on BESS and Inverter units (ESD-p. 30-40)
15. Waste generation plan modified to include weekly pickup around fence line during construction
16. Compliance monitoring plan that coordinates between RIVCO and BLM In conjunction with Active Communities / Desert Center (AC/DC)
17. Traffic management plan includes no employee access on Kaiser Road; speed limits; flagers at junctions (ESD-p. 42)

References to:

-Final BLM Easley Solar Formal Scoping Input Document (ESD)
https://www.dropbox.com/scl/fi/scxfy0msgshct5pv9tvjy/Final-BLM-Easley-Solar-Formal-Scoping-Input-Doc-Oct2023.pdf?rlkey=uv2pojufhc9zs19y70kqcuj72&dl=0

-RIVCO General Plan/DCAP (DACP)

Responses to Comment Set D4 – Bob and Tracy Brooks

D4-1 The commenters are residents of Lake Tamarisk Desert Resort and are opposed to the proposed Project. The commenters' support for the overall goals and objectives of renewable energy, dust mitigation, water aquifer conservation, visual screening and 1 mile setback buffer zones are noted.

Please see Response to Comment D2-5 regarding DCAP 2.3. Please refer to Responses to Comment Set D5, which address the commenter-requested "Respect the Lake Tamarisk" list and associated attachments, as well as Chapters 2 and 5 of the Partially Recirculated EIR analyzing Project Alternatives and General Response GR-1.

D4-2 The commenters include the commenter-requested "Respect the Lake Tamarisk Alternative" document, which lists 17 minimum requirements requested by the residents of Lake Tamarisk Desert Resort and accompanying attachments/documents.

Please refer to Responses to Comment Set D5, which address each of the listed requests.

Comment Set D5 – Mark Carrington

Email: Easley Renewable Energy Project

From: MARK C <mcarrington81@gmail.com>
Sent: Wednesday, February 28, 2024 7:41 AM
To: Wheeler, Timothy <TWHEELER@RIVCO.ORG>
Cc: Bob -and Tracy Brooks LTDR. # 125 <bbbrks@gmail.com>; Cooper Kass <ckass@angellaw.com>; Don and Marta Sneddon Lake Tamarisk # 131 <sneddon_don@yahoo.com>; Frank Angel <fangel@angellaw.com>; Gonzalez, Guillermo <GuiGonzalez@Rivco.org>; Planning <Planning@RIVCO.ORG>; MARK C (BBG) <mcarrington81@gmail.com>; Hernandez, Steven <SAHERNAN@RIVCO.ORG>; Teresa. Lake Tamarisk. #141 Lake Tamarisk. #141 <teresapierce52@gmail.com>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; Vicki and James Bucklin #14 Lake Tamarisk <vickibucklin@pugetisland.com>
Subject: Riverside County Responsibilities .

Hello Tim

While you have repeatedly made it clear that the Riverside County Planning Department has no authority over public land and will not comment on them or address any input that we have related to these lands as they relate to the Environmental Impacts of proposed Easley Project and that the County Supervisors will only be viewing and deciding on the Environmental Impacts on the Private Lands, the following quote indicates that the opposite it is true and the County does have the responsibility on how the entire Project impacts Communities under their care. **D5-1**

> Note that the Riverside County Land Use Ordinance states that a CUP or a PUP "shall not be granted unless the applicant demonstrates that the proposed use will not be detrimental to the health, safety or general welfare of the community."

The health, safety and general welfare of the Community of Lake Tamarisk is definitely at risk now.

The proposed Easley Solar Project, both on private and public lands, would inflict profound negative impacts on the unincorporated Community of Lake Tamarisk if any part of it were to be approved as currently designed. Only by following the minimum requirements of the "Respect Lake Tamarisk Alternative" that incorporates a One Mile Buffer Zone around the Community can meet these CUP requirements.

Since the " Respect Lake Tamarisk Alternative" definitively meets or exceeds all the Project Objective listed in the Draft EIR and, concurrently, significantly reduces the negative Environmental Impacts of the proposed Project, adopting this alternative is the only responsible action that the Planning Department should recommend and our County Supervisors, who our Community relies on for protection, should approve.

Comment Set D5 – Mark Carrington

D5-1 (cont'd)

Intersect Power should be told to redesign the Easley Project to meet the minimum requirements of the “Respect Lake Tamarisk Alternative” before proceeding any further in the permitting process.

Responsible Renewable Energy Development and Protection of the Unincorporated Communities in Riverside County are Not Mutually Exclusive.

Thank you

Mark
Senior Technical Advisor
Active Communities/ Desert Center
Lake Tamarisk

Outline of the “Respect Lake Tamarisk Alternative”

https://docs.google.com/document/d/12m2ErkD3YmiLL6cq45l-rRjsHPxtsWps-W3t3veAVll/edit

Comment Set D5 – Mark Carrington: Attachment 1

Respect Lake Tamarisk Alternative for the Easley Solar Project minimum requirements:

1. Minimum Buffer Zone Setback of 1 mile from the Lake Tamarisk Community borders, including the Phase II extension area. -(ESD-p.11-15, 44-47)(RLTAM) **D5-2**
2. Screening berms at 2 locations -(ESD-p. 15)(RLTAM) **D5-3**
3. Water usage plan modified to exclude water from the Chuckwalla Aquifer without equal metered potable water replacement (ESD-p. 20-28) **D5-4**
4. Aggressive Fugitive Dust management plan to include the following elements -(FDAP) **D5-5**
5. Site preparation plan following EPA guidelines and previously implemented by Crimson Solar -(EPA) **D5-6**
6. Fugitive Dust Abatement Plan includes hydro-seeding native vegetation over any and all disturbed soils (FDAP)(ESD-p. 28-31) **D5-7**
7. Relocate substation (SR)(RLTAM) **D5-8**
8. Bury all transmission lines North of Oasis Road (Technically feasible) (SR) **D5-9**
9. Hydrology plan modified to minimize flooding impacts to downstream properties. (ESD-p. 19) **D5-10**
10. All night lighting shielded to eliminate light leakage outside of construction areas. This specifically includes temporary work lighting. Protect valuable Dark Skies resources. (DCAP-p. 24)(ESD-p. 12) **D5-11**
11. OHV access routes North to Joshua Tree National Park boundary road and East to Hwy 177 (ESD-p. 41) **D5-12**
12. Noxious weed plan modified (FDAP) **D5-13**
13. Noise plan modified (ESD-p. 38) **D5-14**
14. Fire plan modified to include automatic suppression systems on BESS and Inverter units (ESD-p. 30-40) **D5-15**
15. Waste generation plan modified to include weekly pickup around fence line during construction **D5-16**
16. Compliance monitoring plan that coordinates between RIVCO and BLM In conjunction with Active Communities / Desert Center (AC/DC) **D5-17**
17. Traffic management plan includes no employee access on Kaiser Road; speed limits; flagers at junctions (ESD-p. 42) **D5-18**

References to:

-Final BLM Easley Solar Formal Scoping Input Document (ESD) **D5-19**
https://www.dropbox.com/scl/fi/scxfy0msgshct5pv9tvjy/Final-BLM-Easley-Solar-Formal-Scoping-Input-Doc-Oct2023.pdf?rlkey=uv2pojufhc9zs19y70kqcuj72&dl=0

-RIVCO General Plan/DCAP (DACP)

Comment Set D5 – Mark Carrington: Attachment 1 (continued)

D5-19 (cont'd)

https://www.dropbox.com/scl/fi/tdvkse42q5clm613kz04m/Compiled-DCAP-4-2022-rev-6-2022.pdf?rlkey=0g0kfh9qedp8wqkpdpwhbugmb&dl=0

-Fugitive Dust Abatement Plan (FDAP)
https://www.dropbox.com/scl/fi/uiw9k6fdag9u0nrw6mui4/Fugitive-Dust-Management-Plan-Suplemental.pdf?rlkey=9g4x5wi0qtcd3zge18zj98e87&dl=0

-EPA Guidelines submission for Easley project (EPA)
https://www.dropbox.com/scl/fi/yrwd8nz3rflhufr65kcu8/2023-10-23_EPA-NOI-Comments_Easley-Solar-Project.pdf?rlkey=r7yaays7s1n9p2huyhho9bxcs&dl=0

-Crimson Solar ROW/ROD (CS)
https://www.dropbox.com/scl/fi/yqla0xbb0i1uc08bvu31q/Crimson-Solar-Project-ROD_508.pdf?rlkey=14qim8rl1g3xpjspcacko2b4j&dl=0

-Substation Relocation (SR)
https://www.dropbox.com/scl/fi/lpg16ug3f71su6z0obmsh/Substation-Relocation.pdf?rlkey=9n6r3w28l7hj3g3flm5bpyg0o&dl=0

-Respect Lake Tamarisk Alternative Map (RLTAM)
https://www.dropbox.com/scl/fi/satfb3v66n4kd3nb3nbgl/Map-Respect-Lake-Tamarisk-Alternative.pdf?rlkey=0aawvf1ca66ev1kryec41jafz&dl=0

https://www.dropbox.com/scl/fi/d9pgq9ld6x1v9xvmglh3q/Respect-Lake-Tamarisk-Alternative-Map.pdf?rlkey=yq8ij6vtunh83vsycyq0wo7ce&dl=0

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

1

***REFERENCING:**

EASLEY SOLAR
NEPA NUMBER DOI-BLM-CA-D060-2023-0010-EA
ENVIRONMENTAL ASSESSMENT
PUBLIC SCOPING INPUT OCTOBER 23, 2023

D5-20

LAKE TAMARISK COMMUNITY FORMAL SOLAR SCOPING INPUT DOCUMENT

The Community of Lake Tamarisk includes 80 homes consisting of families with and without children. Additionally, 150 homes are occupied by 55 year and older people. Approximately 38 school age who live in the community and attend the local school. There is a library, fire department, golf course, swimming pool, CSA 51 hall and 3 man-made Lakes, as well as a post office. The community also includes the Lake Tamarisk Desert Resort. The resort is a 55 year and older active Community Resort for Desert enjoyment including paddleboarding, swimming, birding, golfing, ATV riding, hiking, bike riding, and other recreational activities.

The Community of Lake Tamarisk is NOT a few "scattered residents located to the South near Lake Tamarisk" or low density as stated in the Easley Solar POD. It is a densely populated Community with a golf course and Lake consuming nearly one half of the area of the Community. The population density is defined as high and medium by the DCAP, not unlike many suburban areas surrounding the communities in the Coachella Valley.

This is the first Community that both the DRECP and The Riverside East SEZ have dealt with and it was completely ignored by both. This was totally irresponsible by both the State of California, Riverside County, BLM Federal, State and Local Field Offices.

The Desert Center Area Plan, part of the Riverside County Plan, clearly states that this Community will remain an Oasis in a Natural Desert Environment, Not an Island in A Dead Sea of Industrial Scale Solar Fields. Each Individual in the Community of Lake Tamarisk purchased their properties on that Commitment. The proposed Easley Solar Project, as currently designed, will destroy the very purpose and identity of this Community.

The Chuckwalla Valley is a Corridor less than 10 miles wide passing between multiple Wilderness Area Mountains, including the Joshua Tree National Park Mountains. This is truly a remarkable gateway into the Desert Environment through the Colorado Desert and into the great Sonoran Desert along Highway 10. This region contains many abandoned gold mines throughout the

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

Wilderness Mountains. Additionally ancient tribal lands, settled as long as ten thousand years ago, are throughout this region. The Corridor is an adventure into the past.

D5-20 (cont'd)

The proposed Chuckwalla National Monument has been presented to Congress by Representative Ruiz and is now before President Biden for final designation. The Chuckwalla National Monument will have a significant impact on the growth and future of Lake Tamarisk. The Monument will surround the Chuckwalla Valley and border the Community of Lake Tamarisk. Desert Center will become the most prominent jumping off point into the National Monument and the little-known community of Lake Tamarisk will be discovered as an Oasis in a vast Natural Desert Environment, as it has been since 1948. .

Desert Center is a central access point to monument trails and adventure facilities will need to be made available for visitors. This may include a truck-stop, store, motel, visitor center and more.

The Community of Lake Tamarisk will be bordered by the monument to the west. As an Oasis in a Vast Natural Desert Environment, the resort community of Lake Tamarisk is the ideal location for a separate visitors RV park, a potential extension of the golf course, winter vacation homes, and more. The need for our Community's expansion acreage that surrounds our currently developed portion of Lake Tamarisk is inevitable.

The lands around the community of Lake Tamarisk need to remain undeveloped and kept in a Natural Desert Environment state to be congruent with the Monument itself.

There are over 100,000 acres still left to build out Solar Installations east of Highway 177, within both the East Riverside County Solar Energy Zone and Development Focus Area of the BLM Desert Renewable Conservation Plan. The Proposed Easley and Sapphire Projects total less than 4000 acres that would produce less than 600 Megawatts of the mandated 25,000 Megawatts in the DRECP.

To allow both the present and future of the Community of Lake Tamarisk to be destroyed, merely due to corporate greed and government agencies unwillingness to review impacts on human communities that have arbitrarily been placed within the Development Focus Area of the DRECP as important as other environmental communities, is against the NEPA process itself.

It would be grossly irresponsible of the BLM's, Local, State and Federal offices as well as our Riverside County planning department and Supervisors to allow such a small reduction in renewable energy production to destroy the present and future viability of this Desert Oasis Resort Community.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

The federal lands surrounding Lake Tamarisk need to be preserved in their natural state in perpetuity to conform with the nature and purpose of the Community and the Chuckwalla National Monument.

D5-20 (cont'd)

The revenue value to Riverside County, from both this expansion and the currently developed portion of the Community, would be substantial and exceed the Solar fees in the long run as property values increase in response to demand. These revenues would be ongoing.

The 1,500 miles of OHV roads and trails in Eastern Riverside County are immediately adjacent to Desert Center and the Lake Tamarisk Community. These trails/roads will be discovered as well and will continue to be available within the Chuckwalla National Monument. Recreational opportunities for Visitors include hiking, exploring of historical gold mines, rock hounding, and wildlife observation to name a few. These Visitors will need a place to stay. The revenue from these Visitors will boost the local economy and increase the tax base.

It is Riverside County's and the BLM's responsibility, as defined in the Desert Center Area Plan, and is in the best interest of Riverside County and the public, to protect this Community. The Riverside County Planning Department needs to base all land use planning on the health and growth of the Community of Lake Tamarisk. This is the entire purpose of the Planning Department. The Riverside County Supervisors should accept nothing less and protect this Community from extinction as an Oasis in a Natural Desert Environment. The BLM is required to respect these Local Area Plans. Please Refer to NEPA and the Rule Change of May 2022.

In addition to the impact of the Monument on the Community, Lake Tamarisk is currently in the application phase of becoming a National Historic Site for the State of California.

The Historical significance of Lake Tamarisk stems from its creation as an Oasis in A Natural Desert Environment for recreation for the "company town" of Eagle Mountain built by Kaiser for the Eagle Mountain Mine employees.

D5-21

In 1948 Henry Kaiser opened the Eagle Mountain mine, the largest iron mine in California, and built the community of Eagle Mountain housing over 4000 employees.

The town of Eagle Mountain was built and run on the principles of what is now Kaiser Permanente HMO, the concept that was developed here for the California Aqueduct workers in 1933.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

All services were provided to the employees, from hospital, medical, groceries, theater, recreational opportunities and more.

The community of Lake Tamarisk was built by Kaiser as the center for recreational opportunities for the town of Eagle Mountain. Three man-made lakes were created and stocked with fish. A swimming pool, park, playground, RV park, and golf course as well as a Community Center were built in the Oasis Resort Community.

Eagle Mountain mine executives and managers built their homes around the lakes and golf course.

In order for NEPA section 106 of the National Historic Preservation Act compliance with 36 CFR 800.8(c) it is necessary to preserve the natural desert environment around the Oasis Resort Community of Lake Tamarisk. This is our past, present and future identity.

All BLM lands surrounding the Community of Lake Tamarisk need to be preserved in their natural state in perpetuity.

D5-21 (cont'd)

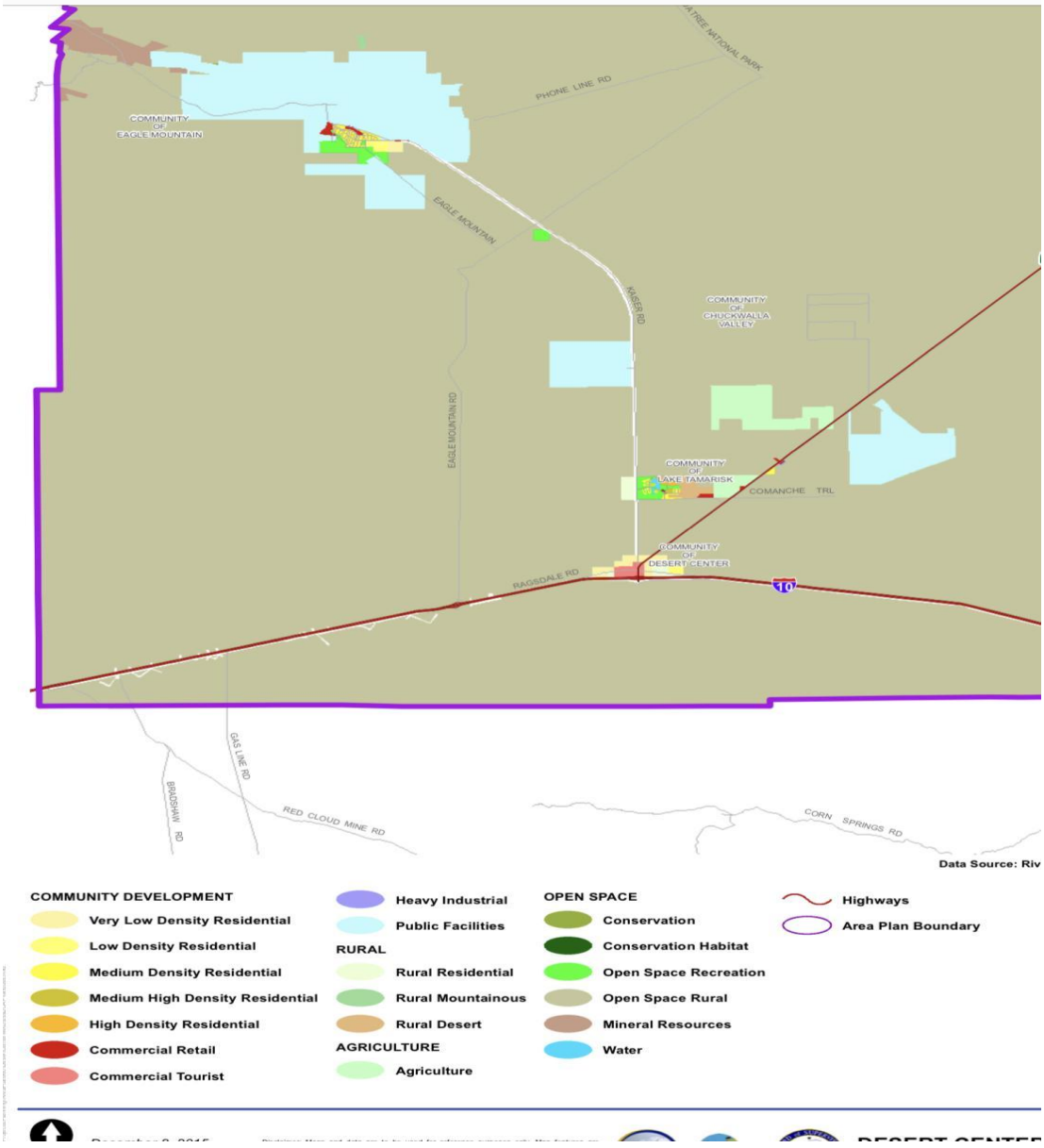
********** *Please refer to The Viable Lake Tamarisk Alternatives Page numbers 43-47* **********

The next two maps represent the expansion area of Lake Tamarisk:

D5-22

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

5

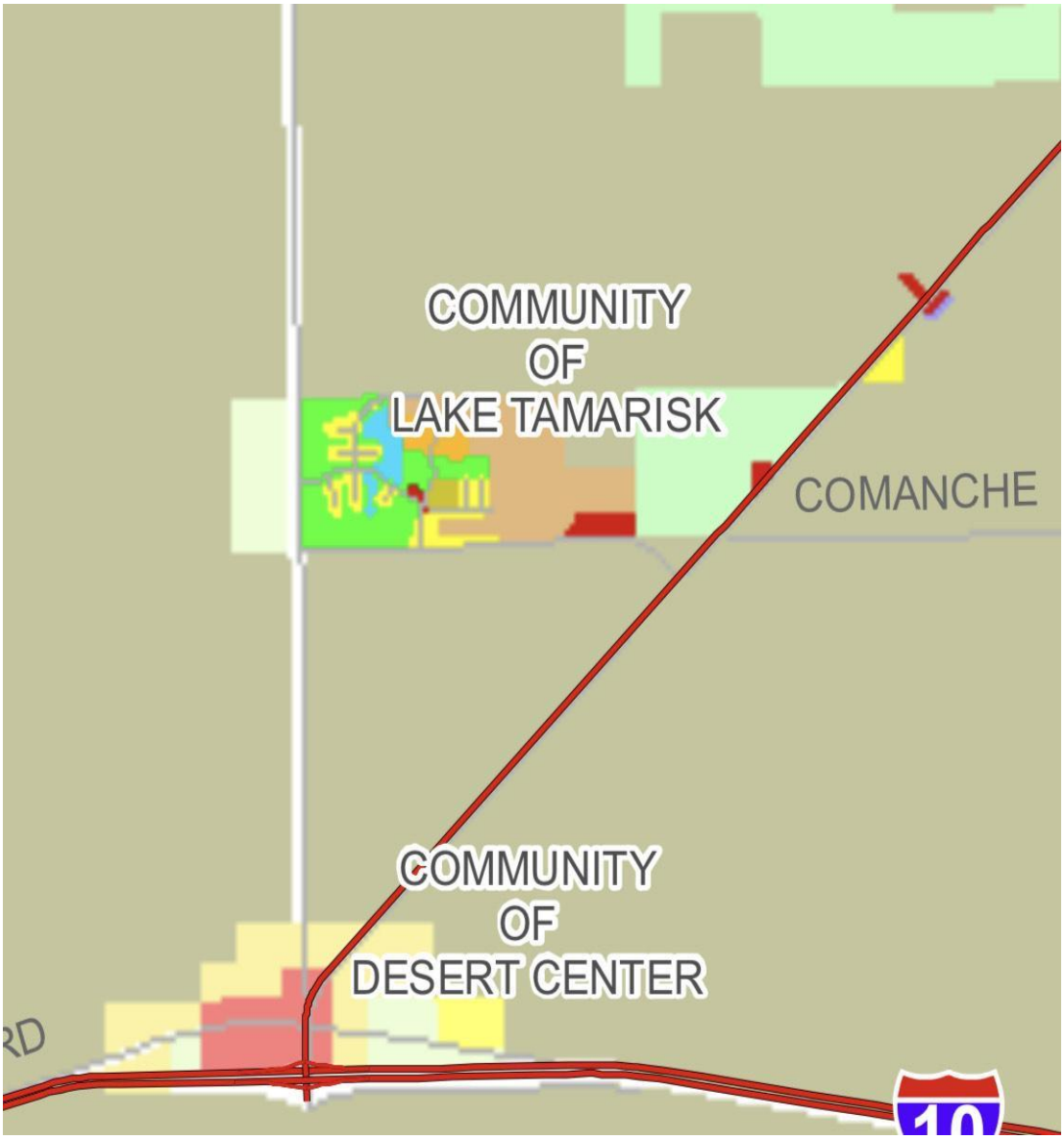


D5-22 (cont'd)

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

6

D5-22 (cont'd)



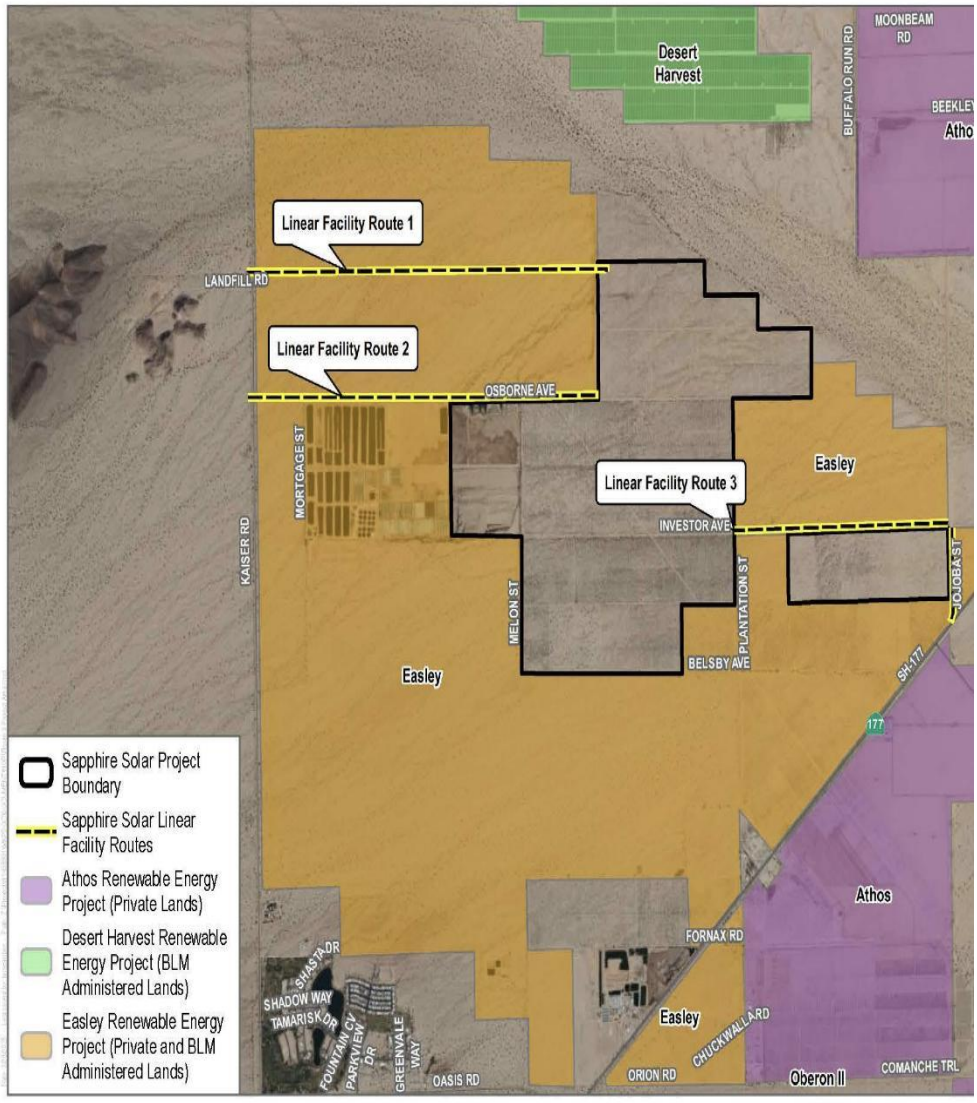
Cumulative Area of the Natural Desert Environment that would be destroyed by the proposed Easley and Sapphire Projects.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

7

This map represents the Industrial Scale Solar Projects, including the Oberon and the proposed Easley and Sapphire Projects which would surround our Community within one-half mile

D5-22 (cont'd)



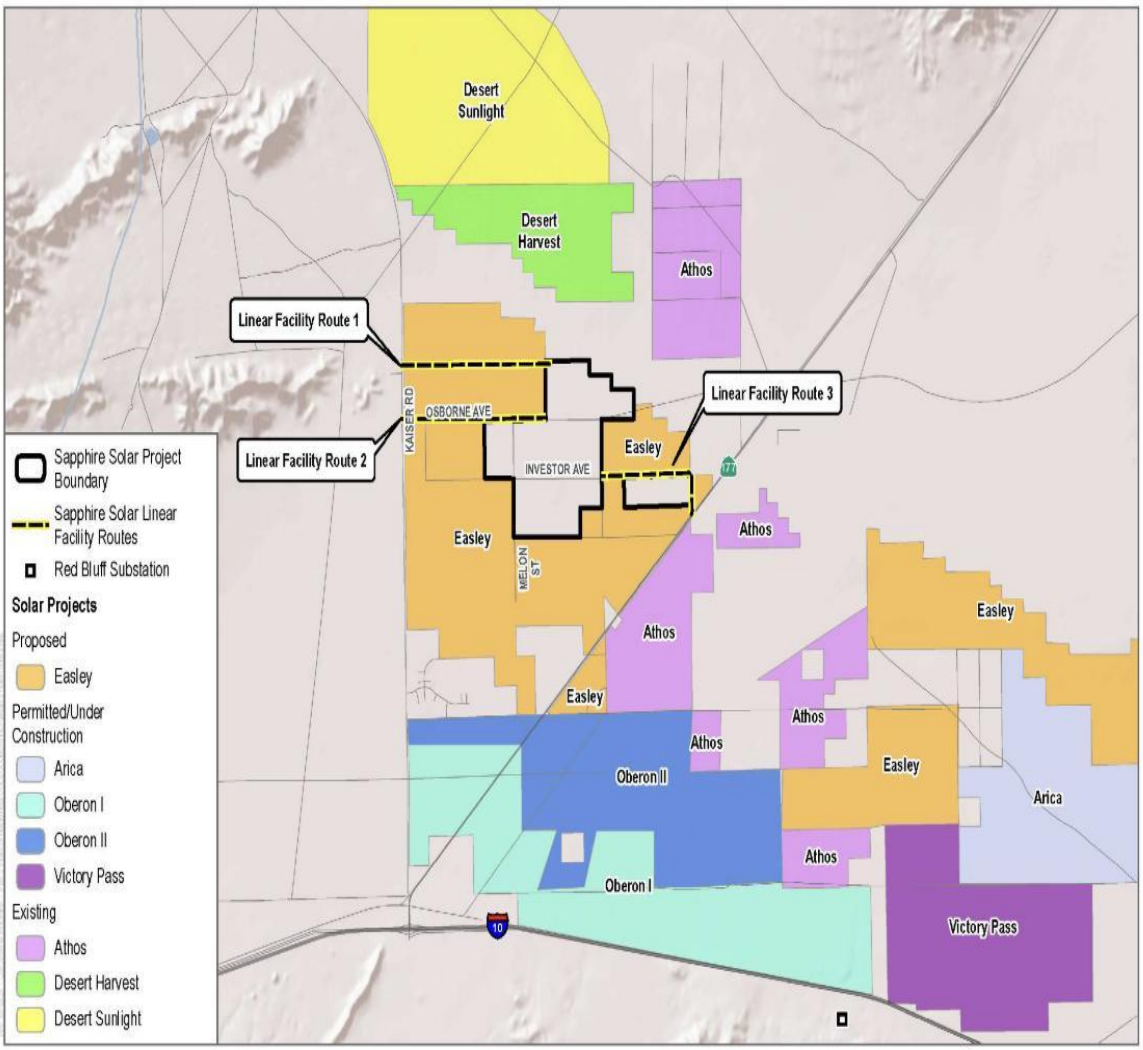
SOURCE: Esri World Imagery Basemap (accessed 2022); County of Riverside 2022; DRECP 2022; BLM 2021

.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

8

D5-22 (cont'd)



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

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-22 (cont'd)

Athos Solar	3,400 acres
Palen Solar	3,000 acres
Arica Solar	2,000 acres
Victory Pass Solar	2,000 acres
Oberon Solar	2,700 acres

There are currently more proposed:

Easley Solar	3,700 acres
Sapphire Solar	1,100 acres

There are over an additional 100,000 acres, to the east of highway 177, in the focus area available for Renewable Energy Development.

The proposed Easley Solar Project by Intersect Power would be at twenty-five feet to one-half mile from our currently developed and undeveloped Community borders. Additionally, the Oberon project, by Intersect Power , is already within one-half mile to our South. The Proposed Easley project alone would surround the Community of Lake Tamarisk on three sides, well within one-half mile and cover the entire Desert for many miles around us; thus, destroying our Natural Desert Environment and the Community's Identity as a Desert Oasis and future survival.

The Community of Lake Tamarisk is also Threatened with Extinction and should have equal basis as the abundant plants and animals in the Desert around us.

FROM THE CODE OF FEDERAL REGULATIONS:

"Title 40/ Chapter V/ SubChapter A/ Part 1508/ SS 1508.1 Definitions for NEPA (g) Effects or Impacts means changes to the human environment from the proposed action or alternatives that are reasonably foreseeably and include the following:
(1) Direct effects, which are caused by the action and occur at the same time and `place
(2) Indirect effects, which are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. In direct effects include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.
(3) Cumulative effects, which are effects on the environment that result from the incremental effects of the action when added to the effects of other past, present,

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-22 (cont'd)

and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or a person undertakes such actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.
(4) Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effects will be beneficial.

NEPA RULE CHANGE, 04/20/2022

https://www.federalregister.gov/documents/2022/04/20/2022-08288/national-environmental-policy-act-implementing-regulations-revisions

"Third, CEQ is revising the definition of "effects" in paragraph (g) of 40 CFR 1508.1 to include direct, indirect, and cumulative effects. CEQ is making these changes in order to better align the provisions with CEQ's extensive experience implementing NEPA and unique perspective on how NEPA can best inform agency decision making, as well as long standing Federal agency experience and practice, NEPA's statutory text and purpose to protect and enhance the quality of the human environment, including making decisions informed by science, and case law interpreting NEPA's requirements."

This NEPA rule change, when taking the definitions of effects and impacts into account, makes it clear that all potential impacts whether direct, indirect, or cumulative must be studied from the standpoint of the human impacts. Therefore, the Community of Lake Tamarisk, as the human environment, must be prioritized in the Environmental Assessment (EA) and the Environmental Impact Statement (EIS).

DEFINITIONS:
NEPA: National Environment protection Act
CEQ: Council on Environmental Quality

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

THE PROPOSED EASLEY PROJECT, AS CURRENTLY DESIGNED, WOULD CREATE THE FOLLOWING PROBLEMS AND ISSUES FOR THE COMMUNITY OF LAKE TAMARISK AND ANY ADDITIONAL SOLAR PROJECTS WOULD SIGNIFICANTLY INCREASE THESE IMPACTS, SINCE THE PROPOSED EASLEY PROJECT IS MUCH CLOSER TO OUR COMMUNITY. THE CUMULATIVE IMPACTS OF THIS PROJECT, ALONG WITH THE RECENTLY CONSTRUCTED OBERON PROJECT, NEED TO BE ADDRESSED AND STUDIED IN DETAIL AND INCLUDED IN THE SCOPE OF THE ENVIRONMENTAL ASSESSMENT. THE IMPACTS ON HUMAN COMMUNITIES HAVE THUS FAR BEEN COMPLETELY NEGLECTED IN PAST ENVIRONMENTAL IMPACT ASSESSMENTS BY BOTH THE CEQA AND THE NEPA PROCESSES.

D5-22 (cont'd)

EACH OF THE "SUBSTANTIVE COMMENTS" ON IMPACTS BELOW NEED TO BE STUDIED IN RELATION TO THE COMMUNITY OF LAKE TAMARISK'S FUTURE HEALTH AND WELFARE.

AESTHETICS / VISUAL RESOURCES / REFLECTION

D5-23

Easley Solar POD Appendix Q: Visual resources and management is missing the following: The Alligator Ridge Panoramic Visual Simulation is completely missing the Oberon Solar Installation,



This image presents a **Visual Simulation** of the Project as viewed from **KOP 3** on the crest of Alligator Rock, just south of I-10. This frame of view encompasses a majority of the Project at viewing distances ranging from approximately 1.6 miles (a portion of the gen-tie line) to approximately 5.6 miles (the Project's most distant solar arrays). The BESS, substation, and gen-tie line are visible in the center-right of the image. The solar arrays appear as dark areal masses on the valley floor intermixed with other solar projects.	KOP 3 Alligator Rock Visual Simulation	Easley Renewable Energy Project Aesthetics / Visual Resources **Figure 3.2-4B**

thereby misrepresenting the impact of Intersect Powers Solar Installation on the Community

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

of Lake Tamarisk. The entire area between Desert Center and Lake Tamarisk is covered by the Oberon Solar Project.

The Lake Tamarisk Panoramic Visual Simulation was taken from five feet above the ground facing East. The Panoramic Visual Simulation needs to be taken from ten feet above the ground in order to represent the visual degradation from home and deck height viewing. No North Panoramic Visual Simulation was done at all.

D5-23 (cont'd)

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 ever-changing micro habitats for both plants and animals. The incredible 360-degree vistas of the Wilderness Mountain Ranges 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 are already adversely affecting our view of these Wilderness Area Ranges. Intersect Power's Oberon Project, in conjunction with their Proposed Easley Project, would seriously degrade the visual quality of our Community. These two Projects, as currently proposed, would surround the Community on three sides from twenty-five feet to one-half mile. The incident of light reflecting from the panels is often blinding and impacts the whole Community.
- Dark Skies would be adversely affected by external lighting unless shields and motion sensors are put into place. This also includes portable work lights and Intersect Power's recently constructed substation lighting also needs shielding. This is one of the few areas in the US with Dark Sky and the nearest to major populations like Los Angeles.
- The Proposed Easley Solar Installation, as currently designed, would be very near and seen from our homes at Lake Tamarisk. Visually, our desert view to the North and East of us would be completely full of glaring solar panels. In addition, the close proximity of the Oberon Project covers the area South of the Community. There is no way to hide such enormous Industrial Scale Solar installations without appropriate set-backs and screening.
- Residents and visitors on their regular desert walks can only go a few hundred feet before running into an Industrial compound.
- The Community of Lake Tamarisk is also Threatened and should have equal basis as the abundant plants and animals in the Desert around us.

D5-24

JUSTIFICATION FOR A DETAILED STUDY:

The reflection from the Proposed Easley Solar Project, which will be immediately bordering our property to the north and east, will greatly impact our view. Below is a picture, taken January 1, 2023, that shows a landscape scale solar installation, five miles out, due North of

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-24 (cont'd)

Lake Tamarisk Resort. The proposed Easley Project, along with the Oberon Project, would surround the Community of Lake Tamarisk well within one-half mile, destroying our Unique desert view. The individuals of our community come here to enjoy the view of the vast expansion of a living desert. The lifestyle we came here to enjoy is being taken from us by Seas of glaring solar panels. There is no way to hide such enormous Industrial Scale Solar installations without appropriate set-backs and screening.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

The Bureau of Land Management has created several nearby 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)[1] 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 the Community of Lake Tamarisk and adjacent conservation areas.

The soon to be designated Chuckwalla National Monument will border Lake Tamarisk as well as the Proposed Easley Solar Project which will cause visual degradation from the Monument.

The proposed Easley Solar Project would butt up against the Monument and increase these visual impacts to the West.

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, Desert Center Area 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 urbanized 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, 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).

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

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

The above quoted excerpts state what should happen at the Desert Center area. Specifically, we at Lake Tamarisk, 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)

D5-24 (cont'd)

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

The below picture represents the view looking north towards an existing Solar Landscape Scale Installation five miles from the Lake Tamarisk border. The proposed Easley Project in conjunction with the much smaller Sapphire Project would encompass and destroy the entire desert view from Lake Tamarisk to the existing solar facility. A Desert Resort Community cannot survive without natural desert environment views. Picture taken January 1, 2023.

Alligator Ridge View



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

D5-25

- *A minimum of a one-mile Set-Back from the Lake Tamarisk Community borders to the nearest solar installation infrastructure is necessary to maintain the visual aesthetics and the integrity and lifestyle and future of the Lake Tamarisk Community.*

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

- *At this distance, in order to block the views of the solar panels, inverters and BESS facilities, berms with vegetative screenings and maintenance thereof are necessary.*
- *Relocate the Easley Solar Project east of Highway 177 and east of the proposed Lycan Solar Project by EDF Renewables. There are over 100,000 acres available east of highway 177 in the Focus Area for Renewable Energy Development.*

D5-25 (cont'd)

POPULATION AND HOUSING AND SOCIOECONOMICS

Population, Housing and Socioeconomics were completely left out of the Easley POD.

D5-26

- The Community of Lake Tamarisk includes 80 homes consisting of families with and without children. There are 66 preschool and school age children who live in the community and attend the local school. There is a library, fire department, golf course, swimming pool, CSA 51 Hall and 3 man-made lakes, as well as a post office. The Community also includes The Lake Tamarisk Desert Resort. The resort consists of 150 dwellings (most of which have two people) that are owned by the residents. The demographics of Lake Tamarisk is nearly 70 percent senior citizens and children, the most sensitive segments of the population. The whole Community enjoys paddleboarding, birding, golfing, ATV riding, hiking, bike riding and other recreational activities.

  Our unique Community, Lake Tamarisk, was chosen specifically by our residents because it is truly an Oasis in a Vast Open Natural Desert full of unique, ever changing micro habitats for both plants and animals. The Incredible three hundred and sixty degree vistas of the Wilderness Mountain Ranges including the Mountains of Joshua Tree National Park, the peaks of the Chuckwalla Mountains, Coxcomb Mountains, Eagle Mountain and the Palen Mountains are irreplaceable.
- Currently the Intersect Power Oberon project is within one half mile of the Lake Tamarisk Community Southern border. Against NEPA regulations, this project was permitted and constructed without any notification or input from our Community. If the proposed Easley Project is permitted and constructed as currently proposed, we would be surrounded on three sides from 25 feet to the East and North and one-half mile to the South of our borders by Utility Scale Solar Installations. The remaining side, to the west, contains high voltage lines and their towers. The identity of the Lake Tamarisk Community, as an Oasis in a Natural Living Desert, will be lost if the Proposed Easley Project is approved as currently designed.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-26 (cont'd)

- Quality of life would be severely diminished for all residents and visitors who come to the desert for the natural beauty, tranquility 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 The Lake Tamarisk Community in such close proximity. We are concerned that our property will inevitably be less desirable and thereby lose its value. No studies on the impacts of Utility Scale Solar Installations, surrounding a community on three sides at such close proximity, has been done anywhere.
- The replacement values of property in the Lake Tamarisk Community, due to the destruction of our Oasis Identity and Lifestyle, cannot be overstated. Even relocation to a similar physical environment would cost a minimum of ten times the current property values. However, the Community's like-minded, family-like circle is impossible to replace. Only litigation could attach a financial liability to this loss.
- Higher local temperatures due to the expanse of vast fields of solar panels near our community will result in higher power bills.
- The Community of Lake Tamarisk is of unique value throughout the Colorado Desert and requires protection by the Riverside County Planners, County Supervisors as well as by the Bureau of Land Management. The Community of Lake Tamarisk is also Threatened with Extinction and should have equal basis as the abundant plants and animals in the Desert around us.

JUSTIFICATION FOR A DETAILED STUDY:

As described above under the section of health, this Community's, being nearly 70 percent seniors and children, the most vulnerable population, health is at risk.

The loss of quality of life that we chose and came specifically here for is directly threatened by this and other similar projects. We did not come to live here to live in a sea of unsightly solar panels surrounding our community. We invested here, as guaranteed by the Desert Center Area Plan, to live in and experience the exact opposite, a beautiful natural desert environment. No one would choose to invest in Resort property in an Industrial Compound.

ADDITIONAL JUSTIFICATION FOR DETAILED STUDY

No community in the Riverside East SEZ or the DRECP development focus area has been encroached on three sides by Industrial Scale Solar Installations. The Combined Impact of the Intersect Power's Easley and Oberon Projects will completely surround the Community of Lake Tamarisk on three sides between 25 feet and one-half mile of our borders,

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

completely covering the natural desert environment up to the Wilderness Mountains surrounding us.
Currently available studies on the impacts of Utility Scale Solar Installations on property values have not included any communities surrounded on three sides at the above distances, nor have they included any Resort Communities.

D5-26 (cont'd)

ADDITIONAL JUSTIFICATION FOR DETAILED STUDY

D5-27

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 one article (A) that discusses many recent studies, most having proven that an array of solar panels
will, indeed, increase the urban local ambient temperature. The second article (B) discusses desert solar arrays, and
indicates increased temperatures of 3-6 CELSIUS are likely.

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.

Exhibit B:
https://phys.org/news/2016-11-solar-island-effect-large-scale-power.amp
This study from 2016 explains how PV panels prevent cooling in the desert floor beneath them, and compares
temperatures in a desert environment near solar production to those that are distanced. It explains that we should expect an increase in temperatures from 3 to 4 Celsius.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

Unfortunately, OUR case at Desert Center is unusually dire. We're located in the center of a shallow bowl with
mountains surrounding nearly 280 degrees of our perimeter, holding in the heat.

If developers 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 Sapphire Solar and other 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+. At night the panels will prevent the heat from escaping, and the ground temperature will remain much higher than before.

All residents WILL suffer higher power bills and general discomfort because of this project. 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.

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.

D5-27 (cont'd)

There is No Place in either the SEZ or DRECP for considering Community Impacts other than worker housing impacts and minority/low-income Environmental Justice. The NEPA Rule Change of 2022 specifically states that "furthermore, NEPA seeks to promote efforts that will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of people, making it the continuing policy of the Federal Government to use all practical means and measures to create and maintain conditions under which humans and nature can exist in productive harmony and fulfill the social, economic, and other requirements of present and future generations of Americans."

D5-28

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

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

- *A minimum of a one-mile Set-Back from the Lake Tamarisk Community borders to the nearest solar installation infrastructure is necessary to maintain the visual aesthetics and the integrity and lifestyle and future of the Lake Tamarisk Community.*
- *At these distances, in order to block the views of the solar panels, inverters and BESS facilities, berms with vegetative screenings and maintenance thereof are necessary.*
- *Relocate the Easley Solar Project east of Highway 177 and east of the proposed Lycan Solar Project by EDF Renewables. There are over 100,000 acres available east of highway 177 in the Development Focus Area for Renewable Energy Development.*

D5-28 (cont'd)

HYDROLOGY

The Easley Solar POD Appendix BB: States that "based on experience with similar projects, most of the site is suitable for the planned development by avoiding or designating areas of high flood depths, velocities, and scour". Based on local experience this statement is not valid.

.

- Configuration of solar panels can alter surface hydrology and create local flooding during rain events and monsoon season.
- Intersect Powers previous projects have caused significant hydrological impacts and property damage. This needs to be studied much further in order to mitigate previous property damage and prevent future damages.
- Appendix H Jurisdictional Delineation:
  "Additionally, beyond federal jurisdiction the SWRCand the RWQCB's may exert regulatory authority over waters of the state. which are defined in Section 13050(e) of the Porter-Cologne Water Quality Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." This definition may include isolated wetlands and other waters that may be outside of federal jurisdiction, which may be subject to Waste Discharge Requirements (WDRs).
- Appendix BB only discusses Hydrology from the point of view of the interior of the Project itself. A detailed study of the hydrological impacts of this project on surrounding properties is required.

D5-29

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-30

WATER SUPPLY ASSESSMENT

The Easley Solar POD Appendix P contains a report on the Chuckwalla Valley groundwater supply by GEI. This clearly shows that any groundwater use by the Easley Project will endanger the future growth and survival of the Desert Center Area.

- Individual solar projects, such as Easley, will require 950-acre feet; which is 309,558,450 gallons of water. The total water usage by both Easley and the much smaller Sapphire Projects, which will overlap in the construction phase, is 451,304,235 gallons of water.
- The local Chuckwalla Aquifer is a critical need for our community and is already being depleted. The aquifer and the project's usage of that water needs to be monitored throughout the entire project every month.
- Recently, since February of 2023 when Intersect Power's Oberon Project drilled and began pumping out of their own well, 4 wells are experiencing issues. Green Acres RV Park had to replace a pump due to the creation of a cone of depression. The water table was down 50 feet at the time Intersect was notified in February of the existence of a cone of depression. John Beaches' pump needs to be replaced. The 2 fish farms, one on Kaiser Road and one on 177 are having pump issues. The one on Kaiser Road Lake View Ranch can only use one of his pumps. Because there is not enough water to do both at the same time. The Global Organic Ranch is pumping muddy and brackish water. All these areas are LESS THAN two miles to Lake Tamarisk.

JUSTIFICATION FOR A DETAILED STUDY:

- *A well level depth study must be done throughout this aquifer 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:

The GEI ground water report clearly shows that the Chuckwalla Valley groundwater supply is within 100/acre feet of becoming unsustainable for the community needs of any future growth of the local Desert Center Area. This would include the entire Chuckwalla Valley. The current solar developments in the Valley have and will continue to use groundwater that is already in very short supply. Under State law it would be illegal for the Government to permit additional use of groundwater more than the aquifer's sustainable annual yield. This report literally shows that any solar development of the Easley Project or other Projects will cause a ground water deficit to occur like what the State of California has experienced in the Central Valley. It would be incredibly

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-30 (cont'd)

irresponsible for the BLM and the Riverside County Water Control Board to allow any future development of Utility Scale Solar in the Chuckwalla Valley that would require access to groundwater.

Excerpts from the GEI Water Report from Appendix P Water Supply Assessment:

"Table 11: provides a 37-year (starting from the Project proposed construction start date [2024] and assuming the Project is in place for 35 years) groundwater budget projection for average years with the Project and all cumulative projects in place and assuming the Project begins using water on January 1, 2024. Only those cumulative projects that would withdraw groundwater during the assumed 2024 to 2060 period of analysis are included. Assuming average precipitation, there would be an initial groundwater deficit of up to 7,000 AF in the year 2024. The cumulative groundwater deficit would increase to approximately 95,800 AF by the end of the 37-year period. Without the Project and all other cumulative projects in place, there would be a surplus of 3,700 AF at the end of the 37-year period. The same analysis using reduced infiltration and underflow estimates results in a total cumulative project deficit of about 262,300 AF, to which the Project would contribute about 1 percent, or 2,750 AF. Using these inflow estimates, the CVGB would not recover the groundwater deficit with or without the Project."

"Table 11. 37-Year Projected Chuckwalla Valley Groundwater Basin Groundwater Budget for the Easley Renewable Energy Project Plus Cumulative Projects Using Adopted Precipitation And Underflow Recharge Estimates

	2024 (AF)	***2025 (AF)***	***2026 (AF)***	***2027 (AF)***	***2028 (AF)***	***2029 (AF)***	***2030 (AF)***	***2031 (AF)***	***2032 (AF)***	***2060 (AF)***
CVGB Baseline Surplus	***100***	***100***	***100***	***100***	***100***	***100***	***100***	***100***	***100***	***100"***

6 2.2 Multiple Dry Years
"Table 12 provides a summary of the multiple dry year analysis using the same methods as described for Table 11, and assuming the Project plus all cumulative projects are in place. At the end of the 12-year period, representing the longest consecutive series of years with below average precipitation on record at the Blythe, ***the cumulative groundwater deficit would be 102,900 AF.*** *The Project would contribute 1,500 AF, approximately 1 percent, to this deficit. The same analysis using the reduced estimates of recharge and outflow result in a cumulative deficit of 129,600 AF. The Project would cause about 1 percent of this deficit."*

"The driest 37-year period was the period beginning in 1893 and ending in 1929. Average annual precipitation during this period was 3.09 inches, or about 91 percent of normal. Table 13 shows that if a repeat of this 37-year period occurs under current (no qualifying projects not already in place)

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-30 (cont'd)

*conditions, **at the end of the 37-year period the CVGB would have a deficit of approximately 27,000 AF** assuming adopted precipitation and infiltration conditions (see Table 2). The greatest groundwater deficit during the repeated drought period would occur during 2039, in which **the total deficit would be approximately 64,100 AF.** Using reduced recharge data, the same analysis results in **a continually increasing groundwater deficit totaling 179,200 AF after 37 years.**"*

*"**The same analysis with the Project in place but with no other cumulative projects gives similar results as the one without project conditions, with a total groundwater deficit of approximately 29,800 AF at the end of 37 years**. Using reduced recharge data, the same analysis, with the Project in place, results in an increasing **groundwater deficit totaling 182,000 AF after 37 years**.*
*Table 14 provides the cumulative project analysis. With all cumulative projects in place, the CVGB total **groundwater deficit at the end of the 37-year period would be approximately 126,500 AF**. Using reduced recharge data, **the 37-year deficit would total approximately 278,700 AF.**"*

7 Summary of Analysis and Conclusions
The following provides a summary of the results of the evaluation presented above:

*"Table 2 indicates that under average climatic conditions and using precipitation recharge and the adopted subsurface inflow recharge estimates, the CVGB would have a baseline groundwater surplus of approximately 100 AFY assuming no qualifying projects not already in place. Using available lower precipitation and subsurface inflow estimates (see Table 3), t**he annual change in groundwater in storage in the CVGB would be a deficit of approximately 4,400 AFY**. In this scenario, any additional groundwater extractions would increase the groundwater deficit except as offset by additional inflows."*

"Tables 4 through 7 indicate that there will be a groundwater deficit in dry years and critical dry years (10 percent and 3 percent probability of occurrence, respectively, assuming no qualifying projects not already in place) using the adopted groundwater inflows and outflows. The magnitude of the deficit depends on the groundwater recharge assumptions."

*"Tables 8 and 9 indicate that under current groundwater extraction conditions and no qualifying projects not already in place, a repeat of the worst sustained drought on record at Blythe (12 years of below-average precipitation) **will likely result in a cumulative groundwater deficit of***

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-30 (cont'd)

***approximately 60,900 to 87,600 AF**, assuming the normal groundwater recharge (see Table 2) and reduced groundwater recharge (see Table 3) estimates, respectively. The volume of groundwater in storage in the CVGB would begin to recover in response to the return of average and above average precipitation conditions."*

*"Under normal groundwater recharge estimates, the addition of the Project to the existing groundwater extractions would create a groundwater deficit in the CVGB only during the 2-year construction phase of the Project (total deficit of approximately 800 AF). **Over the assumed 37-year life of the Project, the Project would reduce the projected CVGB surplus of groundwater in storage by approximately 74 percent**. Assuming reduced groundwater recharge estimates, the Project would increase the projected CVGB cumulative deficit in groundwater in storage by approximately 2 percent over the assumed 37-year life of the Project."*

*"Table 11 indicates that with all cumulative qualifying projects, including the proposed Project, in place and using normal groundwater recharge estimates, the CVGB would experience an initial groundwater deficit of approximately 7,000 AF in 2024 (the planned first year of Project construction). The cumulative groundwater deficit would increase to approximately 95,800 by the end of the assumed 37-year life of the Project. Total groundwater use from all cumulative projects is approximately 7,100 AFY in 2024 and reduces to approximately 2,300 AFY by 2028, resulting in an annual groundwater deficit of approximately 7,000 AFY and 2,200 AFY, respectively. By 2028, the Project would contribute approximately 2 percent of total groundwater use from cumulative projects. **Using reduced groundwater recharge estimates, the CVGB cumulative deficit of groundwater in storage would total approximately 262,300 AF over the assumed 37-year life of the Project with all cumulative projects in place**. The Project would constitute approximately 1 percent of the cumulative deficit."*

*"Table 12 indicates that under a repeat of the multiple dry year scenario based on the 1893 to 1904 below average precipitation conditions, cumulative projects would increase the cumulative groundwater deficit shown in Table 8. With all cumulative projects in place and normal groundwater recharge estimates, **the cumulative groundwater deficit would be approximately 102,900 AF** to which the Project would contribute approximately 1 percent. Using reduced groundwater recharge estimates, there would be **a cumulative deficit of approximately 129,600 AF at the end of the 12-year period**, to which the Project would contribute approximately 1 percent."*

7.2 Conclusions

Based on the use of groundwater budget terms adopted from existing publications, the CVGB's current annual groundwater recharge and outflows are almost balanced, and all estimated

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-30 (cont'd)

groundwater demand for the Project may be sourced from the CVGB without resulting in a cumulative groundwater deficit under average climatic conditions using conservative groundwater recharge estimates. The normal-year baseline groundwater budget for the CVGB indicates an annual groundwater surplus of 100 AF, which is less than the estimated water use for the construction phase of the Project but more than the estimated water use during the operational phase of the Project. This would result in an initial groundwater deficit during the construction Phase of the Project and a recovery of groundwater levels during the operational phase of the Project.

The total projected groundwater use over the assumed 37-year life of the Project is less than the baseline groundwater surplus for the CVGB over the same period. In accordance with DRECP LUPA, a Groundwater Monitoring, Reporting, and Mitigation Plan (LUPA-SW-24) would be implemented for the Project prior to the commencement of any construction activities.

The multiple dry year analysis (see Table 12) shows that a repeat of the longest consecutive dry period on record, with all cumulative projects in place, would result in a total groundwater deficit of approximately 102,900 AF. The Project would contribute 1,500 AF, approximately 1 percent, to this deficit. Tables 13 and 14 show similar analyses without all cumulative projects in place and with all cumulative projects in place, respectively, and using the driest consecutive 37 years on record. "Table 13 indicates that after the initial very-dry period the volume of groundwater in storage would begin to recover, but full recovery would not occur during the projected 37-year period.
Table 14 indicates that although some recovery of groundwater levels would occur during periods of average and above average precipitation, a cumulative groundwater deficit of approximately 126,500 AF would exist at the end of the projected 37-year period.

In general, available well data show relatively stable groundwater levels in the CVGB, interrupted in the Desert Center area in the past mainly by agricultural pumping. Available groundwater level data from the Desert Center area indicate rising, or recovering, groundwater levels following the cessation of most agricultural usage since the 1980s (AECOM, 2010)."

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:
Renewable Energy Impacts on GroundWater in a Desert Basin

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

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-30 (cont'd)

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 overdrawn 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 others in the area have never recovered back to their natural level.

The report also was co authored 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.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-30 (cont'd)

As you can see from Peter's 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 groundwater 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.

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.

All of the water needs for this project need to be drawn from this project from THE CALIFORNIA RIVER AQUEDUCT, operated by the Metropolitan Water District of Southern California.

See Tables below:

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-30 (cont'd)

SOLAR PROJECTS – Within the Desert Center Area Plan										
				Water use (Acres/ft.)				Water Use (US Gallons)		
	Location	M/Watt	Acres	Construction	Annual Maintenance	Total		Construction	Annual Maintenance	Total
Existing:										
Desert Sun	North of Easley	550	3,800	1,507	50	1,557		491,057,457	16,292,550	507,350,007
Desert Harvest #1	North of Easley	103	1,200	400	35	435		130,340,400	11,404,785	141,745,185
Desert Harvest #2	North of Easley	114	1,200	400	35	435		130,340,400	11,404,785	141,745,185
Athos	East & South of Easley	310	3,440	1,000	44	1,044		325,851,000	14,337,444	340,188,444
Under Construction:										
Oberon	South & Southeast of Easley	500	2,700	900	36	936		293,265,900	11,730,636	304,996,536
Arica	Northeast of Oberon	450	1,355	900	35	935		293,265,900	11,404,785	304,670,685
Victory Pass	East of Oberon	200	1,367	520	20	540		169,442,520	6,517,020	175,959,540
Proposed:										
Easley	Immediately North of L.T.D.R.	500	2,700	900	50	950		293,265,900	16,292,550	309,558,450
Sapphire	1 Mile N.E. of LTDR (surrounds Easley)	117	1,192	400	35	435		130,340,400	11,404,785	141,745,185
TOTALS:		2,844	18,954	6,927	340	7,267		2,257,169,877		
Water use to Consider:										
1 Acre foot = 325,851 U.S gallons of aquifer water.										
- Construction will use 6,927 Acre Feet = 2,257,169,877 U.S. Gallons of Aquifer.										
- Annual Maintenance will use 340 Acre Feet = 110,789,340 U.S. Gallons of Aquifer.										
- This is enough water to provide every resident of Los Angeles 1.6 gallons of drinking water per day for an entire year.										
2,2 57,169,877 Gallons of water would cover 10 acres with 695 feet deep of water.,										

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

Land Use to Consider
- The 18,954 acres being used for Industrial Solar fields is equal to 30 square miles of solar fields.
- These Solar Installations with the addition of the Sapphire and Easley Projects will raise the outdoor temperatures by as much as 6 degrees Fahrenheit.
- This will increase the water evaporation and less water will be available for the existing plants.

D5-30 (cont'd)

MITIGATIONS FOR IMPACTS ON GROUNDWATER

- *The Easley Solar Project and all other Projects should obtain all their water supply from other aquifers and not the Chuckwalla Valley Aquifer.*
- *Easley Solar Project may obtain their water supply needs from the California Aqueduct, originating from the Colorado River.*

D5-31

HEALTH EFFECT

The Easley Solar POD appendix T: Health, Safety and Noise Plans has only worker safety plans. There is no discussion or plan to protect our nearby Community.

- Dust and Wind from cleared vegetation and ground disturbance carries silica which can lead to 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.
- Fugitive dust is a by -product of large solar projects in dry desert areas. As a result of these impacted desert soils, there have been very large fugitive dust disturbances since the projects have built out. This creates a serious potential for respiratory health issues and increases the risk of Valley Fever.
- 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 severe 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.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

- The cumulative impact of the Oberon Solar Project and the proposed Easley and Sapphire Projects would significantly compound the above health effects due to the close proximity of the Community.
- The Community of Lake Tamarisk should have an equal basis for health protection as project employees.

D5-31 (cont'd)

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 autoimmune 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.

D5-32

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

- *Fugitive Dust is a by-product of large solar projects being built in dry desert areas. As a result of these disturbed desert soils, there have been very large fugitive dust disturbances*

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

since the projects have been built out. This creates high potential respiratory health issues and increases the risk of Valley Fever.

- *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. Reference: LA Times*
- *This is a letter written by Patti Cockcroft, a resident of Lake Tamarisk who lives at the East end of our resort. It was sent on May 26, 2023, to Teresa Pierce*

"Dear Teresa,

I just spoke with my doctor regarding the tests I had done last week. She has not received the results of the Valley Fever test yet, but the lung x-ray was clear, so I don't have pneumonia.

For your information my challenges began approximately March 1 when I started having a deep bronchial cough. I had been in the desert for two months and the wind had been constant the whole time. In addition, from our deck we can see the dust from the solar fields being constructed a couple of miles away. I flew home on March 8 and went to see my doctor two days later.

Every year I take 1-2 puffs of 125 mcg Flovent a day for mild asthma for the 3 months of pollen season - usually April through June. My symptoms include a little shortness of breath but no cough. The rest of the year I have no symptoms and take no medication.

My doctor thinks the conditions in California caused a severe asthma attack. He increased Flovent to 250 mcg, and I am taking 4 puffs a day, in addition to 2 or 3 puffs of Ventolin a day. And none of this is helping.

On April 4 I began 3 days of Prednisone to get the bronchial cough under control. It did help and I felt good for approximately a month then my chest started to tighten again. I have now been wheezing and coughing again for two weeks and have just been given a prescription for another 3 days of Prednisone.

I will keep you posted on the results of the Valley Fever test. Even if it comes back positive, I still need to get the lungs under control.

It's not very enticing to think of going back to the desert, I can tell you that!"

Thanks, Patti

D5-32 (cont'd)

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).

D5-33

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

31



D5-33 (cont'd)

ADDITIONAL JUSTIFICATION FOR DETAILED STUDY

To name a few stress factors Lake Tamarisk residents are currently experiencing are Health effects which include silicosis, COPD, Valley Fever, and allergies to name a few. The visual beauty of the Resort is diminishing and being replaced by industrial solar compounds. We no longer have tranquility and peace in our community. The insecurity and frustration of not knowing the future of our community is contributing to our stress levels. The fear of severe loss in property values and our chosen way of life and the potential 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".

D5-34

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-34 (cont'd)

"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".

D5-35

MITIGATION OF HEALTH IMPACTS DUE TO PROPOSED SOLAR INSTALLATION:

- *A minimum of a one-mile Set-Back from the Lake Tamarisk Community borders to the nearest solar installation infrastructure is necessary to minimize the health issues of fugitive dust, silica, EMS and stress related health issues on the entire Community.*
- *Relocate the Easley Solar Project east of Highway 177 and east of the proposed Lycan Solar Project by EDF Renewables. There are over 100,000 acres available east of highway 177 in the Development Focus Area for Renewable Energy Development.*
- *The Easley Solar Project will require soil binders such as Earth Glue to be applied to all bare soil areas including the rolled PV fields during construction and reapplied as necessary.*
- *Substantial penalties need to be levied against Intersect Power for any instances of fugitive dust passing over human habitation. For example: work stoppages for one week, following an infraction, would be significant enough to Intersect Power to modify their fugitive dust plan.*

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 have fallen short.

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

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

- *Relocate the Easley Solar Project east of Highway 177 and east of the proposed Lycan Solar Project by EDF Renewables. There are over 100,000 acres available east of highway 177 in the Development Focus Area for Renewable Energy Development.*

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

- *A minimum of a one-mile Set-Back from the Lake Tamarisk Community borders to the nearest solar installation infrastructure is necessary to minimize the health issues of fugitive dust, silica, EMS and stress related health issues on the entire Community.*
- *The Easley Solar Project will require soil binders such as Earth Glue to be applied to all bare soil areas including the rolled PV fields during construction and reapplied as necessary.*
- *Substantial penalties need to be levied against Intersect Power for any instances of fugitive dust passing over human habitation. For example: work stoppages for one week, following an infraction, would be significant enough to Intersect Power to modify their fugitive dust plan.*

D5-35 (cont'd)

BIOLOGICAL RESOURCES

Easley Solar POD Appendix M: Bird and Bat Conservation.
Easley Solar POD Appendix G: Biological Resources
Easley Solar POD Appendix K: Wildlife Protection and Relocation Plans

D5-36

- 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 waterfowl mortality.
- The Protected Desert Dry Wash Woodlands are in narrow fingers throughout these Solar Project areas. Desert animals and plants depend on these Woodland Washes for both food and shelter. Solar panels between these Dry Washes would destroy the wildlife access to these critical environments.

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

D5-37

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-37 (cont'd)

2016. This can be referenced from the 2016 Multi-Agency Avian Solar Working Group conference from 2016[2].

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 water birds also have great difficulty taking off from non-water surfaces, which could leave them stranded in desert areas without food, water or shelter.



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

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-37 (cont'd)

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

- *Relocate the Easley Solar Project east of Highway 177 and east of the proposed Lycan Solar Project by EDF Renewables. There are over 100,000 acres available east of highway 177 in the Development Focus Area for Renewable Energy Development.*
- *A minimum of a one-mile Set-Back from the Lake Tamarisk Community borders to the nearest solar installation infrastructure will minimize the Impacts on biological resources.*
- *Equal mitigation lands need to be purchased by the applicant to replace all natural habitat plants destroyed by the project.*

GEOLOGY AND SOILS

D5-38

- 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.

D5-39

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.[3] 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. [4] 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*

[3] *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*
[4] *http://basinandrangewatch.org/Michael%20Allen%20paper%20copy.pdf*

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-39 (cont'd)

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." [5]

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

- *Relocate the Easley Solar Project east of Highway 177 and east of the proposed Lycan Solar Project by EDF Renewables. There are over 100,000 acres available east of highway 177 in the Development Focus Area for Renewable Energy Development.*
- *A minimum of a one-mile Set-Back from the Lake Tamarisk Community borders to the nearest solar installation infrastructure will minimize the Impacts on geology and soils.*
- *There is only one possible mitigation for the loss of desert plants and their sequestration of carbon except mowing and rolling vegetation as well as hydroseeding native plants throughout the entire project, including the PV fields.*

HAZARDS AND HAZARDOUS MATERIALS

D5-40

- 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 hailstorms, high winds and blowing gravel.

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

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

- Desert sand, disturbed by solar construction, is very high in silica, which can cause Silicosis.

D5-40 (cont'd)

CULTURAL RESOURCES/ARCHEOLOGY

D5-41

There is no appendix in the POD for preserving Cultural Resources.
6.1.2 Cultural and Paleontological Resources is only briefly discussed in the POD Appendix 00.

- The Resort Community of Lake Tamarisk is part of the historical Kaiser Mine where Kaiser Permanente Health was born. Kaiser employees were housed in the Community of Eagle Mountain and all services, including medical services, were provided within the Community. Lake Tamarisk was available to the Kaiser employees for golfing, swimming, fishing in the man-made lakes, shuffleboard and a Community Center. Executives and Managers were permitted to build homes in the Community of Lake Tamarisk.
- This Desert Area was General Patton's training grounds for one million troops headed to North Africa in the 1940's. Many artifacts remain in this immediate area.
- Native American, as old as ten thousand years, are also in the immediate area

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

- *Relocate the Easley Solar Project east of Highway 177 and east of the proposed Lycan Solar Project by EDF Renewables. There are over 100,000 acres available east of highway 177 in the Development Focus Area for Renewable Energy Development.*
- *A minimum of a one-mile Set-Back from the Lake Tamarisk Community borders to the nearest solar installation infrastructure is necessary to protect the Cultural significance of Lake Tamarisk.*

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-42

NOISE

Easley Solar POD Appendix T: Health, Safety and Noise Plan
5. Noise Plan.

Noise from the inverters is not addressed. This recording is taken 100 yards from the inverter. (right click to open link then turn up volume)
https://mail.google.com/mail/u/0?ui=2&ik=3c5845b019&attid=0.1&permmsgid=msg-f:1780297953941009393&th=18b4e38e830233f1&view=att&disp=safe

- The project would **NOT** comply with Riverside County Noise Ordinance number 847 to protect the noise sensitive receptors near the project site. The maximum decibel level depend on the receiving land use, such that sound level "low-density Rural Community shall not exceed fifty-five bBA Lmax during the daytime hours (7 am – 10pm) or forty-five bBA Lmax during the nighttime hours (10 pm – 7am)". While Lake Tamarisk is a "RuralCommunity" we are not low-density. According to Riverside County the Community of Lake Tamarisk is both high-density and medium-density. There is no part of this Community that is low-density as stated in the Easley Solar POD.
- The noise during construction is a concern. It causes stress which has an adverse effect on our peace and tranquility and quality of life. As a result of the solar facilities construction noise, our local property values and future growth of our community are in jeopardy.
- The removal of vegetation to the north-east and the construction of solar panels 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. Intersect Power's 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:

- *Relocate the Easley Solar Project east of Highway 177 and east of the proposed Lycan Solar Project by EDF Renewables. There are over 100,000 acres available east of highway 177 in the Development Focus Area for Renewable Energy Development.*
- *A minimum of a one-mile Set-Back from the Lake Tamarisk Community borders to the nearest solar installation, as well as berms, and maintained native planting screening is necessary to minimize the noise and disruption to the Community.*

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-43

FIRE MANAGEMENT

Easley Solar POD Appendix V: Fire Management and Prevention Plan

- 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 frac tanks.
- Inverters and BESS are not included in the fire protection plan. Two nearby inverters have caught fire. Inverter or BESS fires spew large amounts of poisonous gasses which a wind can carry to Lake Tamarisk according to Captain Casey of our Local Fire Department.

6.1 Wildland Fire Management Plans and Policies

- Gen-Tie Lines present a wildfire risk.
- The Desert Center Area Plan DCAP 10.1 protects life and property from wildfire hazards through adherence to the fire hazard section of the General Plan Safety Element.

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.

ADDITIONAL JUSTIFICATION FOR DETAILED STUDY:
Review the General Plan Safety Plan DCAP 10.1 Inverters present serious hazards if fire management plans do not control inverter fires better than the pictures below display.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

40

D5-43 (cont'd)

- 



MITIGATION OF IMPACTS ON FIRE MANAGEMENT TO PROPOSED SOLAR INSTALLATION:

- *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.*
- *Effective fire suppression system needs to be in place on each inverter and BESS unit.*

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

41

D5-44

RECREATION
Recreation was completely left out of the Easley POD.

- The Easley Solar Project would eliminate OHV routes from Lake Tamarisk north to the Joshua Tree boundary road and east to Highway 177.
- 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, hiking, 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 natural desert environment.



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

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-44 (cont'd)

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

- *If any portion of the Easley Solar Project is built west of Highway 177, HOV access trails/roads need to be developed north to the Joshua Tree boundary road and east to Highway 177.*

TRAFFIC AND TRANSPORTATION

Easley Solar Project Appendix X: 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.
- Residential access to Highway 177 from Kaiser Road will be seriously delayed due to the continuous stream of construction vehicles, equipment delivery vehicles and solar employee traffic.

MITIGATION OF TRAFFIC AND TRANSPORTATION

- *No solar employee access on Kaiser Road to the project roads, in order to protect residents.*
- *All solar employee access must be at project entry points along Highway 177.*
- *No solar employee or solar truck traffic may travel Oasis Road.*
- *Speed limit must be reduced to 35 mph on Kaiser Road from the intersection with Oasis Road to construction equipment project entry points, in order to protect residents.*
- *A flagger will be necessary at the junction of Kaiser Road and Highway 177 during employee arrival and departure times, to allow residents access to the Highway and Freeway without prolonged wait times.*

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-45

"REASONABLE ALTERNATIVES"

VIABLE LAKE TAMARISK ALTERNATIVES

Alternatives to the POD submission by Intersect Power for the Easley Solar project.

NEPA quotes: "In determining the alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or can implement an alternative. "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant" (Question 2a, CEQ. Forty Most Asked Questions Concerning CEO's NEPA Regulations, March 23, 1981.)" end quotes.

Note that the Megawatt output of the Easley Solar Project is merely the "applicant's desire" and not the overall objective for renewable energy by BLM and the DRECP.

Beside the No Action alternative, the following "Reasonable Alternatives" would allow most or all the applicants desired electrical power production while maintaining the present and future health and viability of the Lake Tamarisk Community.

Viable Lake Tamarisk Alternative 1

Move the entire project East of Highway 177 and East of the proposed EDF Renewables Lycan project. Intersect Power would be required to reapply for permits on this new site.

This alternative would preserve the remaining Natural Desert BLM lands not already destroyed by Landscape Scale Solar Projects for 5 miles North of Lake Tamarisk.
The private lands would remain non-industrial as stated in the Desert Center Area Plan.
The major impact on Intersect Power would be the additional expense of a longer Gen-Tie line to reach the substation that they built on the assumption that the BLM would approve the Easley project without analyzing the impact it would have on the Community of Lake Tamarisk. The Oberon project passed through the entire NEPA process without notification or Community input.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-46

Viable Lake Tamarisk Alternative 2, A Minimum 1 Mile Setback:

Under this "reasonable alternative" all infrastructure and PV panels would only be permitted for construction at a minimum distance of 1 mile from the borders of the current and future expansion area of the Lake Tamarisk community. See Figure 1(below)

The justifications for this Minimum Setback alternative cannot be overstated. Lake Tamarisk, to retain its identity as a viable Oasis Resort Community in a Natural Desert Environment, must have sufficient natural desert surroundings for residents and visitors to experience the truly unique Colorado Desert.
There must be no impression left of being in an industrial compound when walking the Desert around our Community. To be otherwise would destroy the current health and future existence of this Community.

The applicant, Intersect Power, may replace the PV panels lost by this setback from their current site plans on the relinquished permit lands east of Highway 177. These areas were relinquished due to moving sands and Desert Dry Wash Woodlands. These regions have sufficient usable areas for PV panel construction to make up for the loss of panels within the 1-mile setback from Lake Tamarisk. Less than ¼ of the project would require relocation.
It would be up to Intersect Power to either pursue permits for several small solar fields on those lands or accept a reduction of approximately 20%-25% of the Easley Solar project.

A mere 100-Megawatt reduction would meet the requirements of this alternative.
Either way, this alternative would be "technically and economically feasible" regardless of the applicants desires.

The importance of 100 megawatts to the Presidential objective production requirements of 25 GW by 2025 of renewable energy is insignificant to say the least when compared to the loss of an entire pre-existing thriving Community. Intersect Power can replace the 100 Megawatts on appropriate areas of the lands that they relinquished just East of Hwy 177.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-47

NEPA Rule Change:
https://www.federalregister.gov/documents/2022/04/20/2022-08288/national-environmental-policy-act-implementing-regulations-revisions

"President Nixon signed NEPA into law on January 1, 1970. NEPA seeks to "encourage productive and enjoyable harmony" between humans and the environment, recognizing the "profound impact" of human activity and the "critical importance of restoring and maintaining environmental quality" to the overall welfare of humankind."

"Furthermore, NEPA seeks to promote efforts that will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of people, making it the continuing policy of the Federal Government to use all practicable means and measures to create and maintain conditions under which humans and nature can exist in productive harmony and fulfill the social, economic, and other requirements of present and future generations of Americans."

"The revision clarifies that agencies have discretion to consider a variety of factors when assessing an application for an authorization, removing the requirement that an agency base the purpose and need on the goals of an applicant and the agency's statutory authority. The final rule also makes a conforming edit to the definition of "reasonable alternatives" in 40 CFR 1508.1(z). Second, CEQ is revising 40 CFR 1507.3 to remove language that could be construed to limit agencies' flexibility to develop or revise procedures to implement NEPA specific to their programs and functions that may go beyond the CEQ regulatory requirements. Third, CEQ is revising the definition of "effects" in paragraph (g) of 40 CFR 1508.1 to include direct, indirect, and cumulative effects. CEQ is making these changes in order to better align the provisions with CEQ's extensive experience implementing NEPA and unique perspective on how NEPA can best inform agency decision making, as well as longstanding Federal agency experience and practice, NEPA's statutory text and purpose to protect and enhance the quality of the human environment, including making decisions informed by science, and case law interpreting NEPA's requirements."

Note that the Human Environment is also emphasized.

"NEPA's statutory text and purpose to protect and enhance the quality of the human environment, including making decisions informed by science, and case law interpreting NEPA's requirements."

The Community of Lake Tamarisk IS the "human environment" near the project.

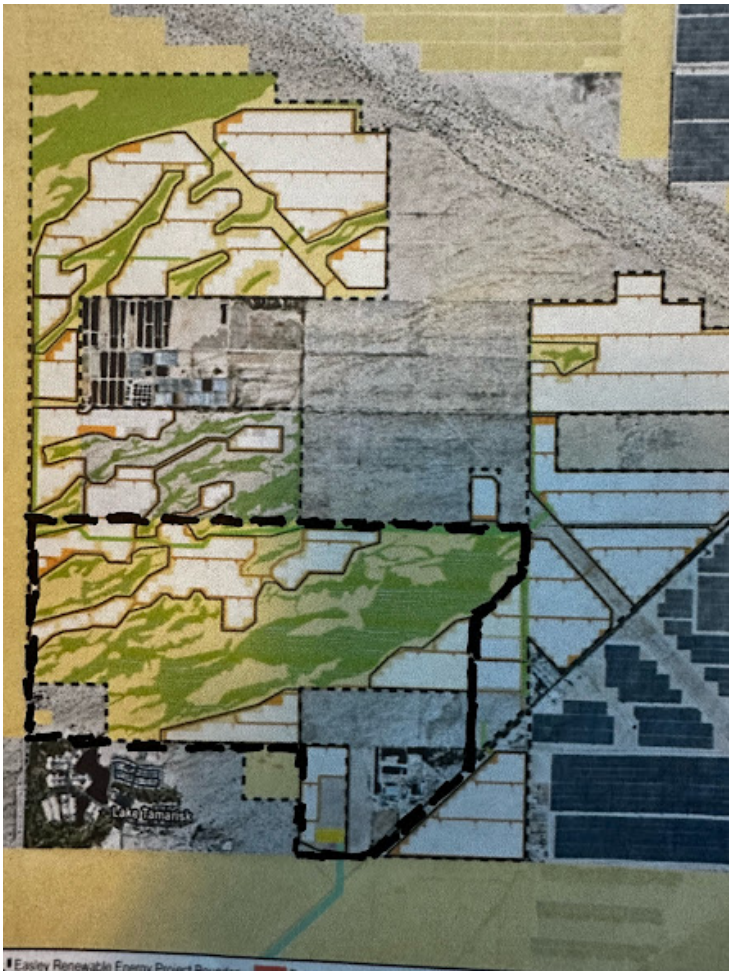
Accordingly, the Bureau of Land Management is not required to appease the applicant's desires for maximum output or their cost considerations if they choose to build elsewhere. Under the new Napa regulations as of May 2022 the environmental considerations supersede all applicant considerations and Lake Tamarisk must be considered as part of the environmental concerns. Feasibility complaints from the applicant are not to be considered according to the

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-47 (cont'd)

ruling. The project's POD must change to fit environmental considerations and be altered in a way that meets those considerations, even if that results in the reduction of the project or the lack of feasibility on the applicant's review. It is the BLM's responsibility to uphold these rules and define the alternative that best meets the environmental needs even at the expense of the project itself. Is the Alternative technically and economically feasible? Yes, from the standpoint of the overall objective, although it may slightly reduce the applicants' profits

Figure 1 - The map below shows the minimal distance boundaries of this alternative. Note the boundary of the project would be on Private lands



Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-47 (cont'd)

At this minimum distance, berms and/or vegetative screening are mandatory to block the entire project from view at a height of 10 feet at the boundaries of Lake Tamarisk.
Vegetative screening, such as tamarisk trees, would be on private land and therefore allowable. Trees must be established, cared for, and trimmed to a height that does not block the Bajada slopes of the Chuckwalla Valley while hiding the entire project from the view of the Lake Tamarisk Community.
Tamarisk trees have been successfully established along berms and fish farms in this region for many decades.

Soil binders across the project are necessary to manage FUGITIVE DUST.

Dust management has been egregiously unsuccessful by Intersect Power in their previous projects as can be attested to by all residents near these projects.
Soil binders enhance the success of vegetative regrowth. Even though Intersect Power will mow and roll most of the project area to be constructed, the soils will be disturbed and freely blown with winds. Soil binders need to be applied over the entire project footprint. It would be necessary to reapply soil binders when equipment disrupts the soils. Single track travel throughout these solar fields would diminish the reapplication requirements.

The Substation shall be located along Hwy 177 on the site designated in the Intersect Powers "Lake Tamarisk Alternative Site." The substation shall be painted with light absorption paint in the same or similar color as on the inverters, and screened with vegetation such as tamarisk trees which shall be established and maintained to block the entire substation from view of Lake Tamarisk.

This document describes the pertinent changes in NEPA as of May 2022 as well as the BLM's regulations to take our "substantiative comments" seriously and study each in detail FROM THE POINT OF VIEW OF THE RESIDENTS OF THE COMMUNITY OF LAKE TAMARISK.
WE ARE THE VICTIMS WHO WOULD BE SERIOUSLY INJURED IF THE Proposed Easley Solar Project was allowed as currently proposed to move forward in the NEPA process and approved. Other Utility Scale Solar Projects near us have been approved without our notification or input

THE IMPACTED:

THE RESIDENTS OF THE OASIS COMMUNITY OF LAKE TAMARISK

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-48

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 prison style fences.

If the proposed Easley Solar Project is built as currently designed, it will have significant negative impacts on our personal, economic, physical, and mental well-being. There have been no Communities, especially with a senior resort, considered within the scope of any environmental study or the original EIS from the 2016 DRECP. There have not been any studies on any Community surrounded on three sides by Industrial Scale Solar Installations.

The Community of Lake Tamarisk will suffer from both direct and long term indirect impacts. Additionally, the cumulative impacts of the Oberon Project, built without either notification or input from the Community, and the proposed Easley Solar Project would be devastating. The proposed Sapphire Solar Project, by EDF Renewables, would fill in all the remaining open ground surrounding the Community.

The residents of Lake Tamarisk Community do not want to be sacrificed for the benefit of reaching a national renewable energy goal. In reality, the 400 megawatts produced by the proposed Easley Solar Project would have an insignificant impact on the 25 gigawatts mandated to be completed by 2025.

The Community of Lake Tamarisk is also Threatened with Extinction and should have equal basis as the abundant plants and animals in the Desert around us.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

ADDENDUM 1: Land Use Plan Amendment

D5-49

The Desert Renewable Energy Conservation Plan (DRECP) is an amendment of the California Desert Conservation Area plan and is the dominant Land Use Plan of the region. The Desert Renewable Energy and Conservation Plan (DRECP) is a landscape-scale planning effort covering 22.5 million acres in seven California counties--Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino, and San Diego. The California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, and the U.S. Fish and Wildlife collaborated to develop the DRECP across jurisdictional boundaries.

In order to establish the DRECP, the BLM had to amend the original California Desert Conservation Area plan as well as local BLM land use plans.

The Federal Land Policy and Management Act (FLPMA) requires the BLM to maintain on a continuing basis an inventory of all public lands and their resources and other values (Inventories, Section 201).

Planning, per FLPMA Section 202, instructs that the Secretary of the Interior shall, with public involvement and consistent with the terms and conditions of the Act, develop, maintain, and, when appropriate, revise land use plans which provide tracts or areas for the use of the public lands.

The purpose of a Resource Management Plan (RMP) is to:
1. Allocate resources and determine appropriate multiple uses for the public lands;
2. Provide a strategy to manage and protect resources;
3. Establish systems to monitor and evaluate the health of resources and effectiveness of practices. RMPs are like a public lands version of municipal zoning. The Bureau of Land Management evaluates and amends or revises its land-use plans in response to changing conditions and demands on the public lands, or when new components are added to the National Conservation Lands that it manages. Keeping a plan up-to-date helps ensure that the BLM manages the public lands in ways that meet the multiple-use and sustained yield goals that Congress has set for these lands.

The DRECP Lands have been divided up into the categories of conservation lands and Development Focus Areas.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-49 (cont'd)

The DRECP failed to consider how renewable energy would impact communities and failed to create a Conservation and Management Actions (CMAs) that buffers communities from renewable energy impacts. Under the National Environmental Policy Act, Environmental Justice and Socio-economic impacts are required to be analyzed. The DRECP has a surprising lack of these kind of impacts described and fails to include required setbacks to local communities.

The Easley Solar Project is being proposed very close to the community of Lake Tamarisk. A section of the project would be located only a few feet from the community.

The BLM should be proposing alternatives that create a buffer around the community. With a Land Use Plan Amendment, the BLM could create a permanent protected buffer on the federal land just north of Lake Tamarisk. BLM should consider a buffer up to 5 miles but could also designate the section north of Lake Tamarisk as a "Solar Exclusion Zone:
A Land Use Plan Amendment could offer a number of actions that could be added to the DRECP Conservation Management Actions for the area. For example, all DRECP Development Focus Areas on BLM lands have been downgraded to Visual Resource Management (VRM) Class IV to help expedite approval of solar projects. The objective of VRM Class IV is to: provide for management activities which require major modification of the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape can be high. Management activities may dominate the view and may be the major focus of viewer attention.

This is an oversight of the DRECP in the Lake Tamarisk and Desert Center area and a LUPA could potentially upgrade the VRM Class on a buffer zone to VRM Class II which has the objective is: to retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer.

The DRECP has seemingly countless "conservation management actions" to protect biological and cultural resources in the area. Many of these are listed in the CMA's as "BIO 1 and CUL 1 for example. We would like to request a Land Use Plan Amendment that creates a CMA Mitigation category called "Community Setbacks" and these could be justified under the NEPA review for Socio-economics.

Community setbacks would potentially create long term solutions for communities that are facing large-scale solar plans coming up to their doorstep.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

51

In the case of Easley Solar, a one to 5 mile buffer could be created specific to Lake Tamarisk but would not require a full-scale change to the entire DRECP Plan.

A Community Setback would protect property values, air quality, visual resources, groundwater, cultural and biological resources.

The DRECP as a major Land Use Plan would probably not be ripe for a holistic revision for 10 to 20 years. This is far too long for local desert communities to wait as conditions on the ground change and their quality of life is threatened. A small, local LUPA is therefore entirely reasonable and justified.

D5-49 (cont'd)

ADDENDUM 2:
These photos below represent the negative impacts of solar farms.

PHOTOS:
Represents Athos Solar fencing in close proximity to house.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

52

D5-49 (cont'd)



Photo courtesy of Kevin Fitzgerald, CV Independent

Athos Solar Fencing in close proximity to Green Acres Park



Photo courtesy of Kevin Fitzgerald, CV Independent.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

53

D5-49 (cont'd)

Transmission Lines on the west border of Lake Tamarisk



Photo courtesy of Kevin Fitzgerald, CV Independent

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



Courtesy of Teresa Pierce December 2022

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

54

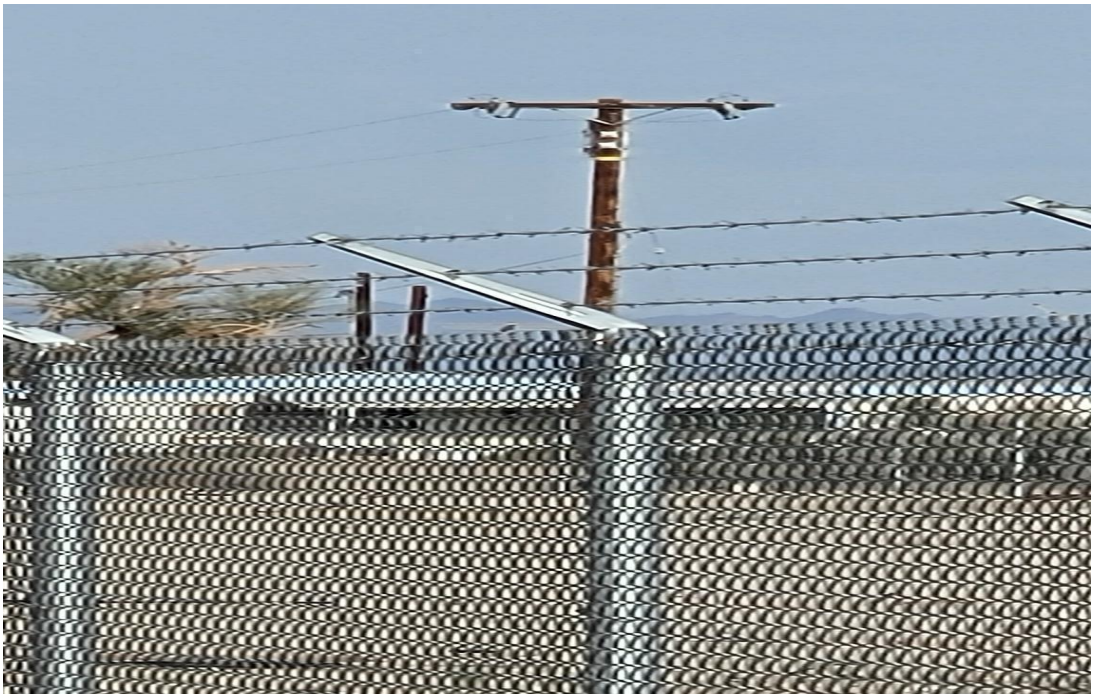
D5-49 (cont'd)

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



Comment Set D5 – Mark Carrington: Attachment 2 (continued)

55



D5-49 (cont'd)

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

D5-49 (cont'd)

Active Community/Desert Center
Lake Tamarisk

Teresa Pierce, Chief Executive Officer
Mark Carrington, Senior Technical Advisor
Don Sneddon, Director of Information and Communication
Sharon Dilley, Chief Administrative Assistant

VIP CONTRIBUTORS:

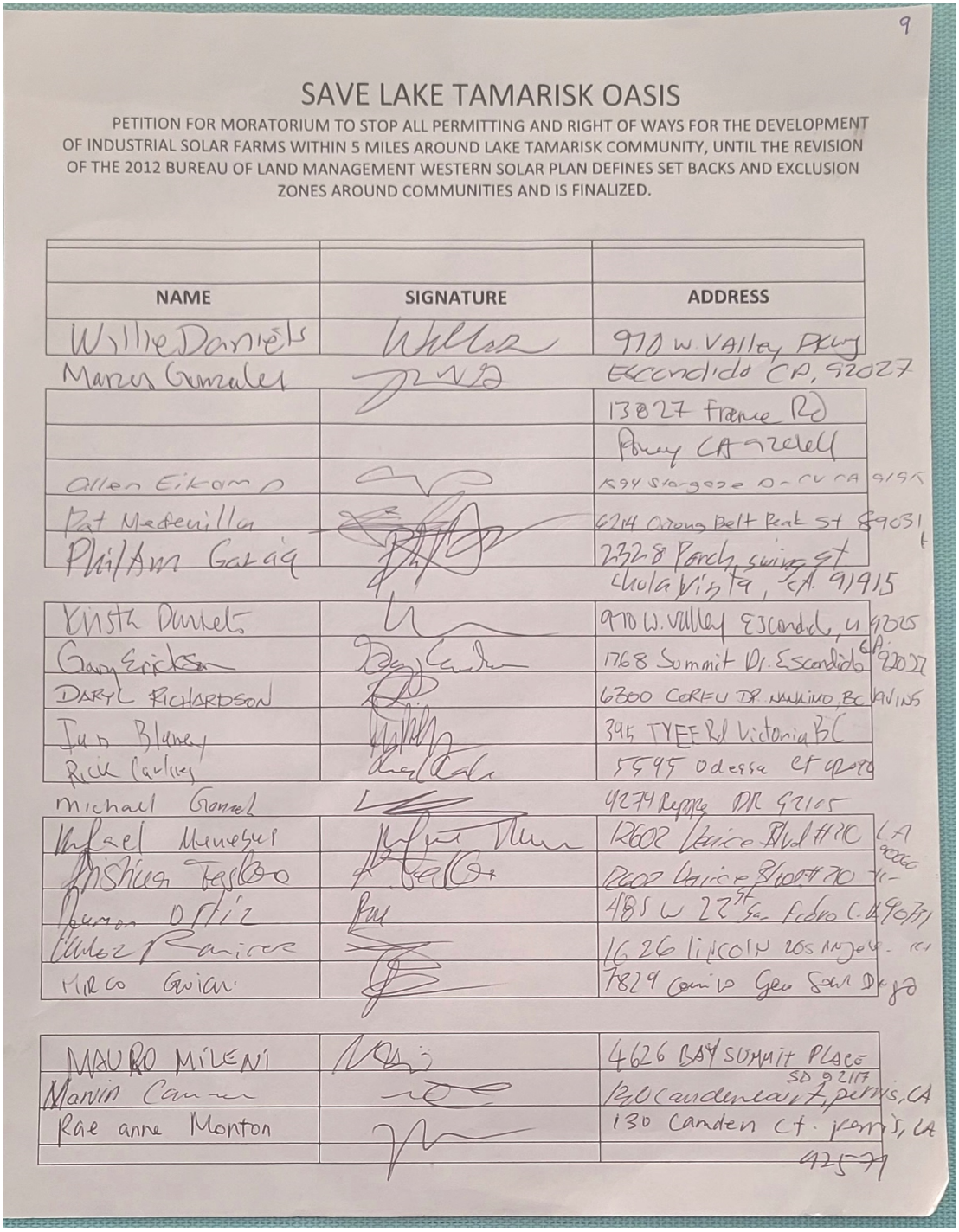
Skip Pierce CSI
Kent Madison, 3R Valve LLC
Bob Mitchell
Vicki Bucklin
Jerry Grey
Candace Ryding
Kevin Emmerich, Co-Founder Basin and Range Watch
Kevin Fitzgerald, Coachella Valley Independent News

Listed on the following pages are local area supporters who are outraged that the Bureau of Land Management and Riverside County would allow Intersect Power to build Landscape Scale solar installations that would surround the Lake Tamarisk Community within twenty-five feet to one-half mile of our borders and therefore destroying our identity as a Resort Oasis in a Natural Desert Environment.

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

57

D5-49 (cont'd)



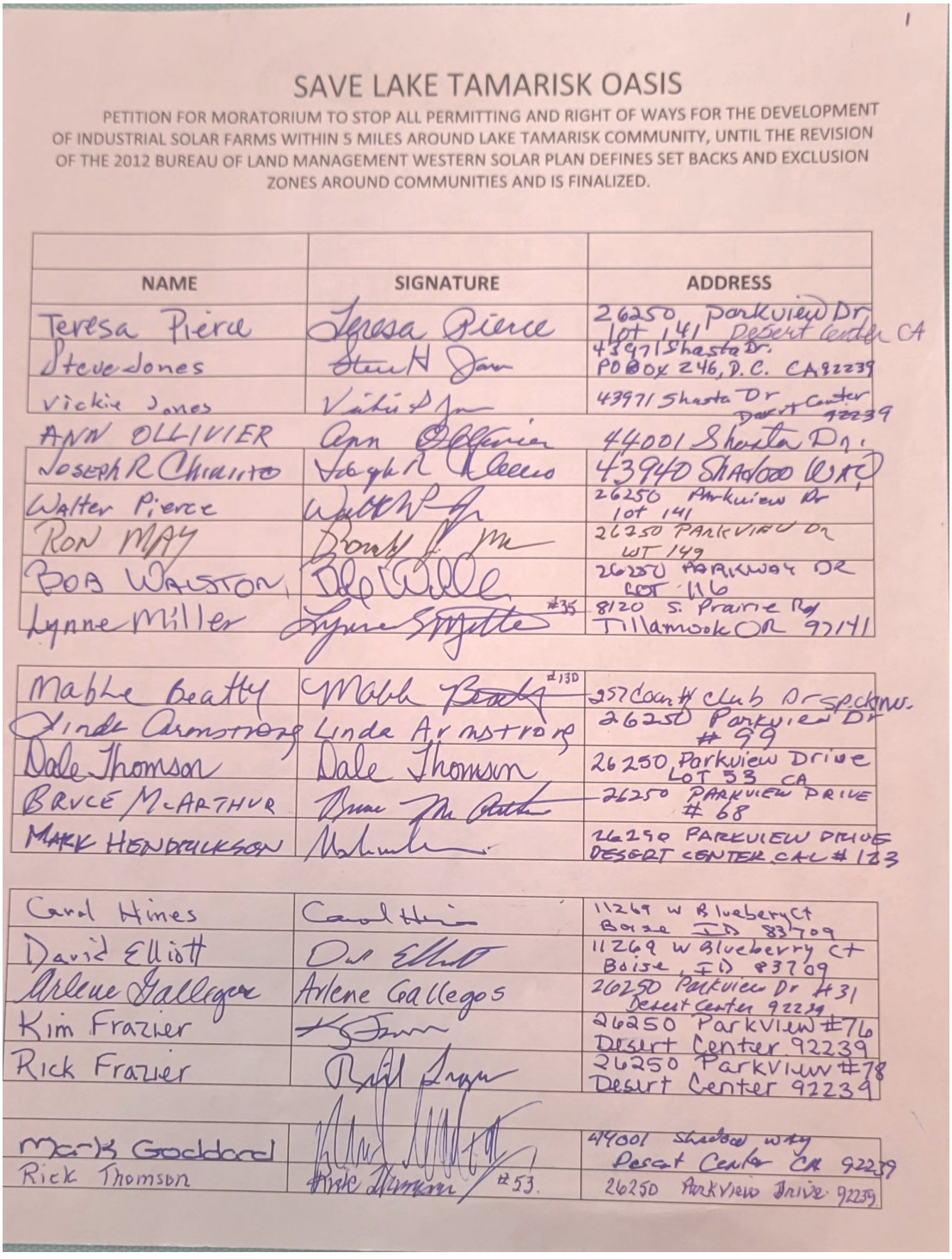
9

SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME	SIGNATURE	ADDRESS
Willie Daniels		970 W. Valley Pkwy
Marcus Gonzales		Escondido CA, 92027
		13827 Frame Rd
		Poway CA 92064
Allen Eikamp		434 Stargaze Dr CV CA 9195
Pat Medenilla		6214 Orcutt Belt Peak St 89031
Phil/Ann Gatag		23228 Porch swing St Chula Vista, CA. 91915
Krista Daniels		970 W. Valley Escondido, CA 92025
Gary Erickson		1768 Summit Dr. Escondido CA 92027
DARYL RICHARDSON		6300 COREU DR NANAIMO BC V9V1N5
Jan Blaney		345 TYEE Rd Victoria BC
Rick Carling		5595 Odessa CT 92154
Michael Gonzal		9274 Peppy DR 92105
Rafael Menezes		1602 Venice Blvd #210 LA 90006
Joshua Taylor		1602 Venice Blvd #210 LA 90006
Jaime Ortiz		485 W 22nd St San Pedro CA 90731
Linda Ramirez		1626 LINCOLN LOS ANGELES CA
Mirco Gaviar		7829 Comino Gen San Diego
MAURO MILENI		4626 BAY SUMMIT PLACE SD 92117
Marvin Cam		130 Camden Ct. Perris, CA
Rae anne Monton		130 Camden Ct. Perris, CA 92571

Comment Set D5 – Mark Carrington: Attachment 2 (continued)



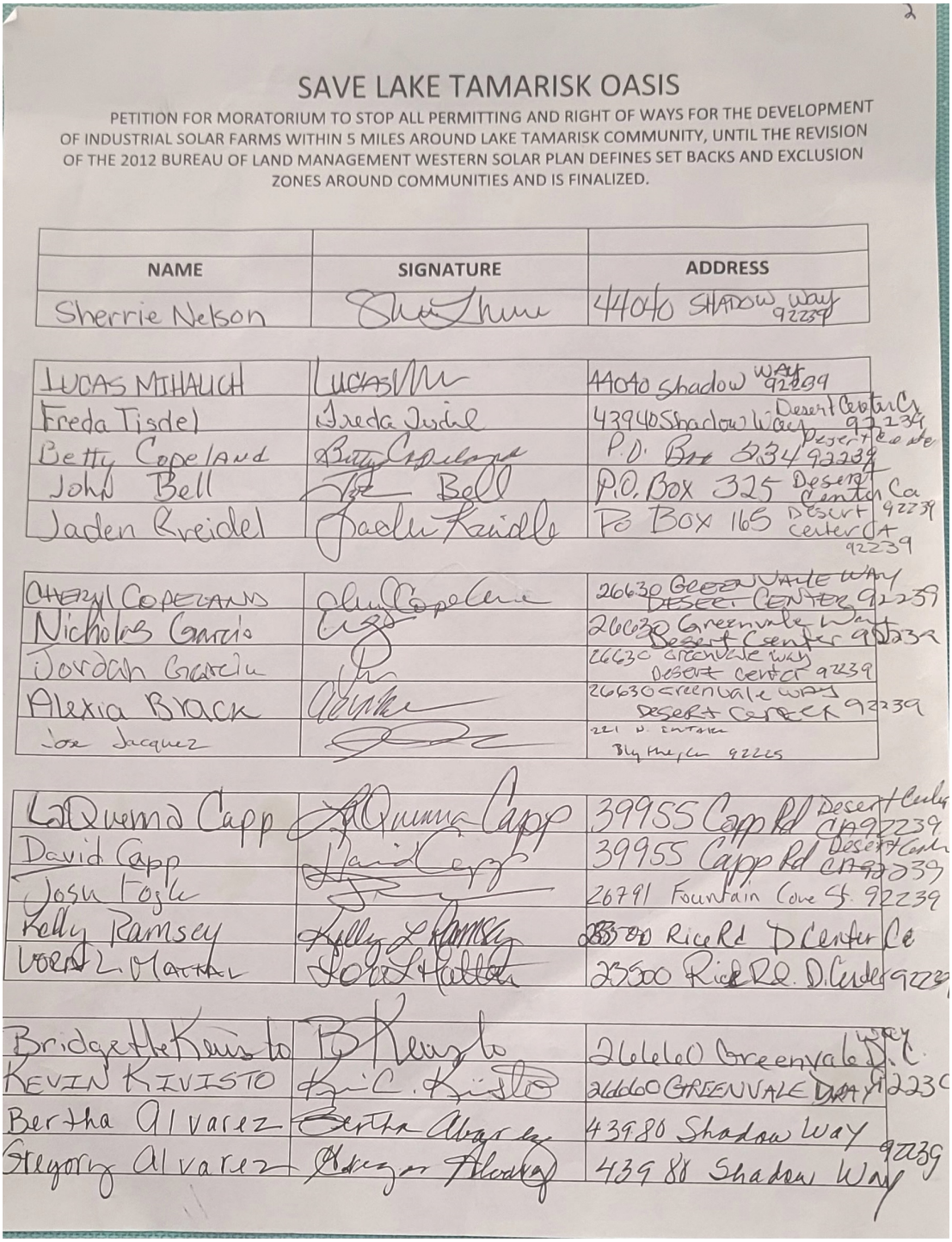
SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME	SIGNATURE	ADDRESS
Teresa Pierce	Teresa Pierce	26250 Parkview Dr lot 141 Desert Center CA
Steve Jones	Steve H Jones	43971 Shasta Dr. PO Box 246, D.C. CA 92239
Vickie Jones	Vickie D Jones	43971 Shasta Dr Desert Center 92239
ANN OLLIVIER	Ann Ollivier	44001 Shasta Dr.
JOSEPH R CHIARITO	Joseph R Chiarito	43940 Shasta Dr WX
Walter Pierce	Walter P Jr	26250 Parkview Dr lot 141
RON MAY	Ronald L May	26250 PARKVIEW DR LOT 149
BOB WALSTON	Bob Walston	26250 PARKWAY DR LOT 116
Lynne Miller	Lynne Smyth #35	8120 S. Prairie Rd Tillamook OR 97141
Mable Beatty	Mable Beatty #130	257 Country Club Dr Spokane
Linda Armstrong	Linda Armstrong	26250 Parkview Dr #99
Dale Thomson	Dale Thomson	26250 Parkview Drive LOT 33 CA
BRUCE MCARTHUR	Bruce McArthur	26250 PARKVIEW DRIVE #68
MARK HENDRICKSON	Mark Hendrickson	26290 PARKVIEW DRIVE DESERT CENTER CAL #183
Carol Hines	Carol Hines	11269 W Blueberry Ct Boise ID 83709
David Elliott	David Elliott	11269 W Blueberry Ct Boise, ID 83709
Arlene Gallegos	Arlene Gallegos	26250 Parkview Dr #31 Desert Center 92239
Kim Frazier	Kim Frazier	26250 Parkview #76 Desert Center 92239
Rick Frazier	Rick Frazier	26250 Parkview #78 Desert Center 92239
Mark Goddard		44001 Shadow Way Desert Center CA 92239
Rick Thomson	Rick Thomson #53	26250 Parkview Drive 92239

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

59



2

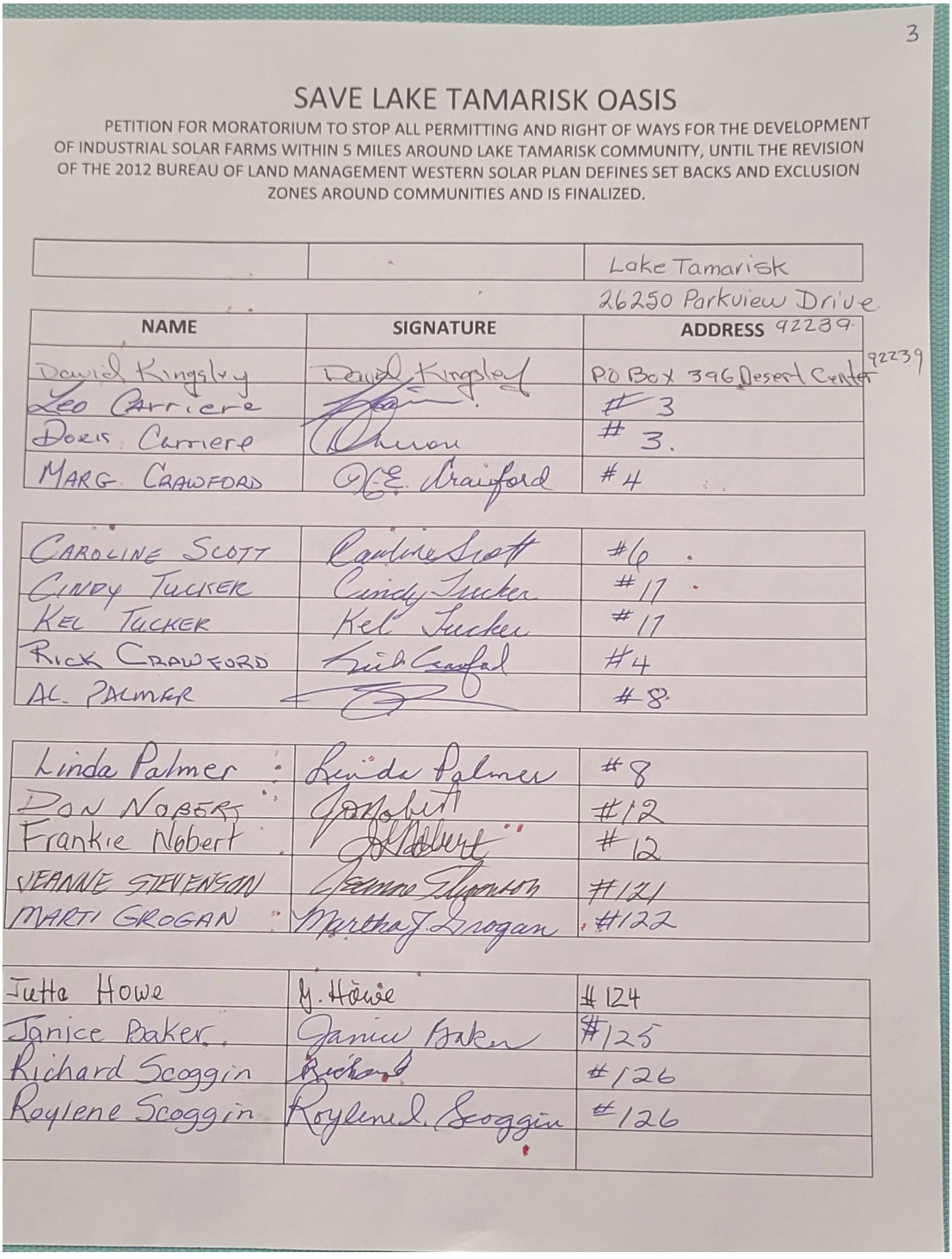
SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME	SIGNATURE	ADDRESS
Sherrie Nelson		44040 SHADOW WAY 92239
LUCAS MIHALICH		44040 Shadow Way 92239
Freda Tisdel		43940 Shadow Way Desert Center Ca 92239
Betty Copeland		P.O. Box 534 92239
John Bell		P.O. Box 325 Desert Center Ca 92239
Jaden Kreidel		PO Box 165 Desert Center CA 92239
CHERYL COPELAND		26630 GREENVALE WAY DESERT CENTER 92239
Nicholas Garcia		26630 Greenvale Way Desert Center 92239
Jordan Garcia		26630 Greenvale Way Desert Center 92239
Alexia BRACK		26630 Greenvale Way DESERT CENTER 92239
Joe Jaquez		221 N. Entrada Blythe, Ca 92225
LaQuenda Capp		39955 Capp Rd Desert Center CA 92239
David Capp		39955 Capp Rd Desert Center CA 92239
Josh Foyle		26791 Fountain Cove St. 92239
Kelly Ramsey		23500 Rice Rd D Center Ca
Robert L Martin		23500 Rice Rd. D Center 92239
Bridgette Kristo		26660 Greenvale D.C.
KEVIN KIVISTO		26660 GREENVALE DR 92239
Bertha Alvarez		43980 Shadow Way 92239
Gregory Alvarez		43988 Shadow Way

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

60



3

SAVE LAKE TAMARISK OASIS

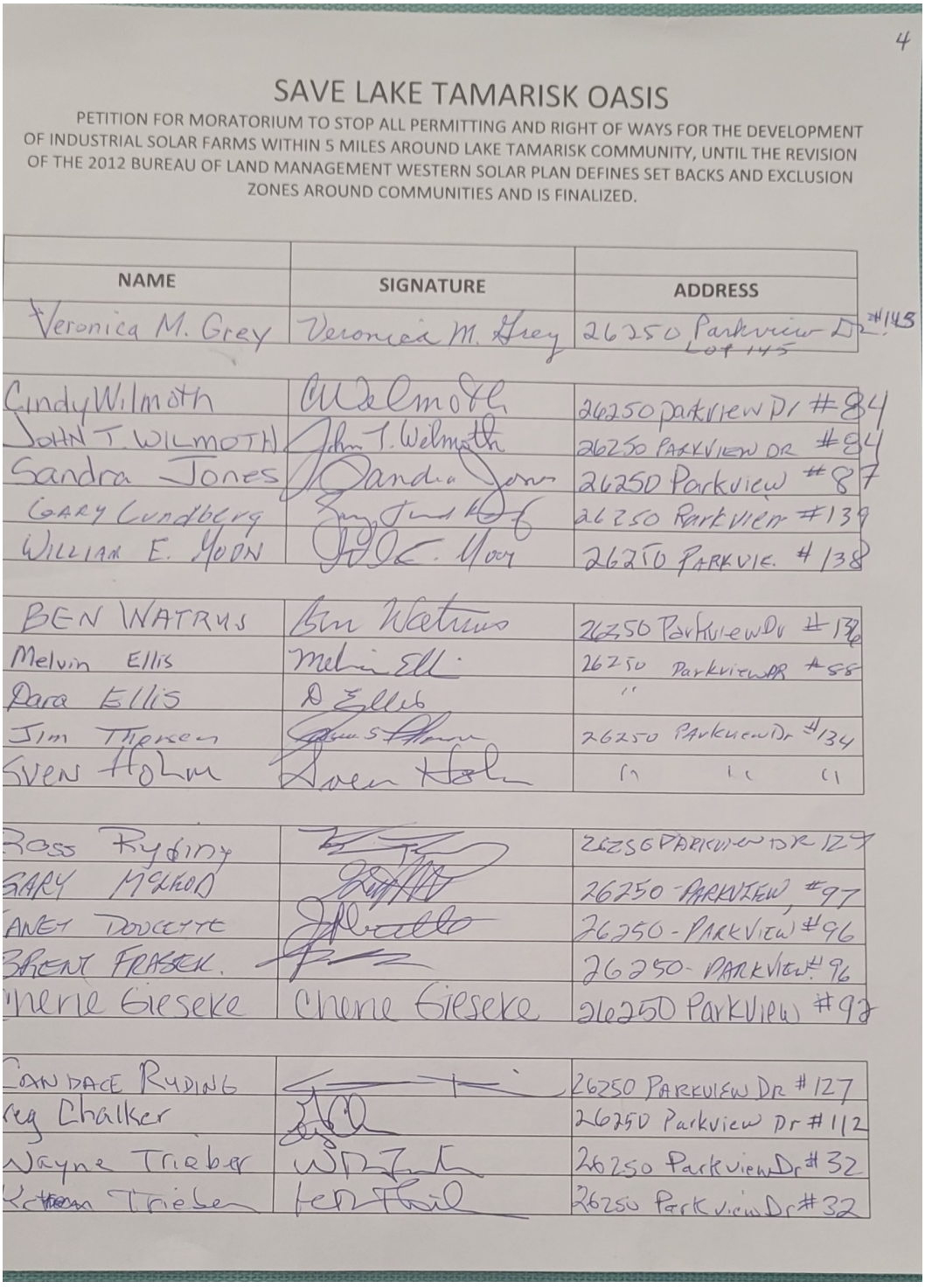
PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

Lake Tamarisk
26250 Parkview Drive

NAME	SIGNATURE	ADDRESS 92239
David Kingsley	David Kingsley	PO Box 396 Desert Center 92239
Leo Carriere		#3
Doris Carriere		#3.
MARG. CRAWFORD	M.E. Crawford	#4
CAROLINE SCOTT	Caroline Scott	#6
CINDY TUCKER	Cindy Tucker	#17
KEL TUCKER	Kel Tucker	#17
RICK CRAWFORD	Rick Crawford	#4
AL PALMER		#8
Linda Palmer	Linda Palmer	#8
DON NOBERT	Don Nobert	#12
Frankie Nobert	Frankie Nobert	#12
JEANNE STEVENSON	Jeanne Stevenson	#121
MARTI GROGAN	Martha J. Grogan	#122
Jutta Howe	J. Howe	#124
Janice Baker	Janice Baker	#125
Richard Scoggin	Richard	#126
Roylene Scoggin	Roylene L. Scoggin	#126

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

61



4

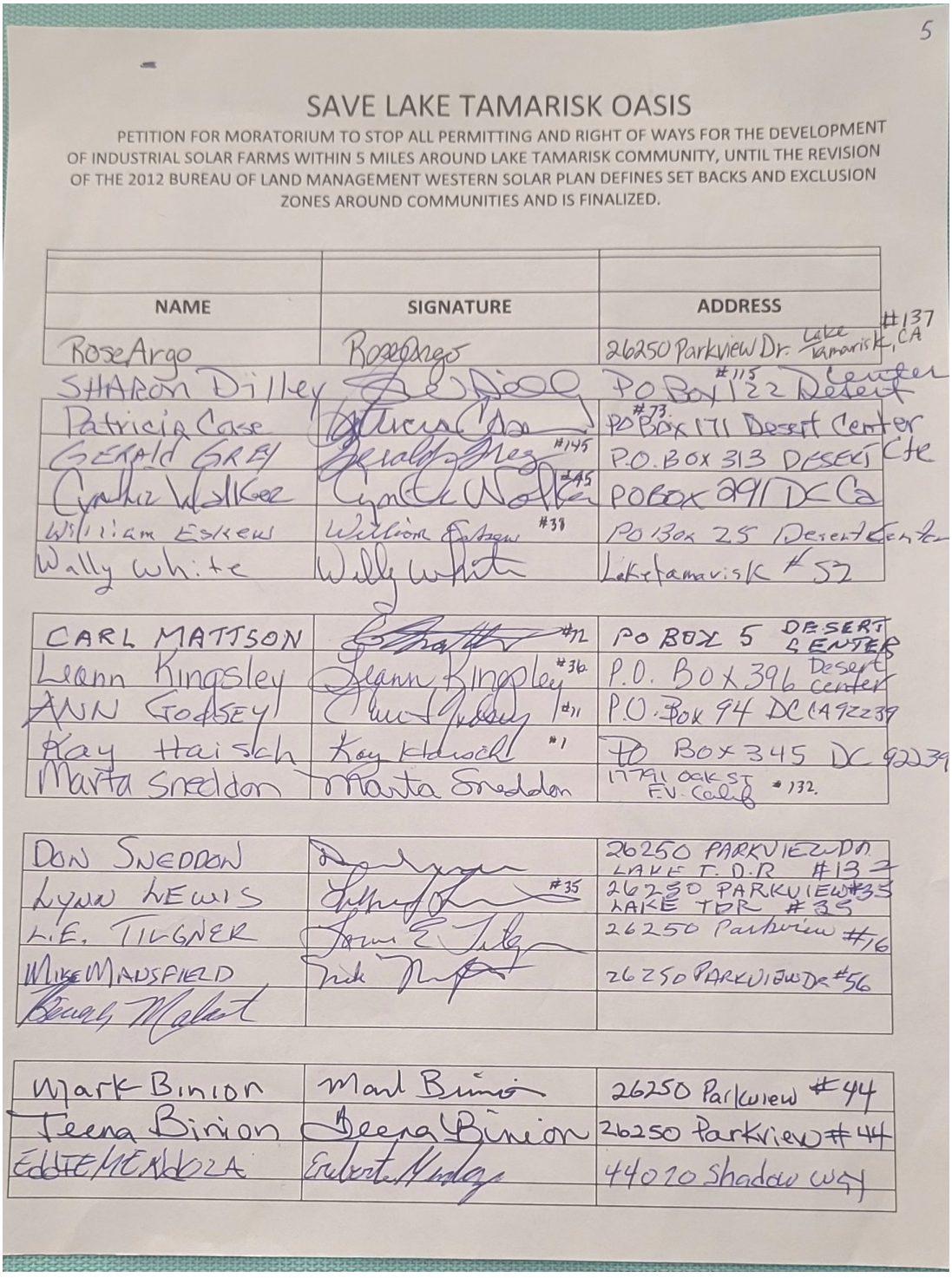
SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME	SIGNATURE	ADDRESS
Veronica M. Grey	Veronica M. Grey	26250 Parkview Dr #143 LOT 143
Cindy Wilmoth	Cindy Wilmoth	26250 parkview Dr #84
John T. WILMOTH	John T. Wilmoth	26250 PARKVIEW DR #84
Sandra Jones	Sandra Jones	26250 Parkview #87
GARY Lundberg	Gary Lundberg	26250 Parkview #139
WILLIAM E. MOON	William E. Moon	26250 PARKVIE. #138
BEN WATRUS	Ben Watrus	26250 Parkview Dr #136
Melvin Ellis	Melvin Ellis	26250 Parkview DR #58
Dara Ellis	D Ellis	"
Jim Thiesen	Jim Thiesen	26250 Parkview Dr #134
SVEN Holm	Sven Holm	" " "
Ross Rydin		26250 PARKVIEW DR 127
GARY McROD		26250 PARKVIEW #97
ANEY DOUCETTE		26250 - PARKVIEW #96
BRENT FRASER		26250 - PARKVIEW #96
Irene Gieseke	Irene Gieseke	26250 Parkview #92
JOAN DACE RYDING		26250 PARKVIEW DR #127
Peg Chalker		26250 Parkview Dr #112
Wayne Trieber		26250 Parkview Dr #32
Kathleen Trieber		26250 Parkview Dr #32

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

62



5

SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME	SIGNATURE	ADDRESS
Rose Argo	Rose Argo	26250 Parkview Dr. Lake Tamarisk, CA #137
SHARON Dilley		PO Box 122 Desert Center #115
Patricia Case		PO Box 171 Desert Center #73
GERALD GREY	#145	P.O. BOX 313 DESERT Cte
Cynthia Walker	#45	POBOX 291 DC Ca
William Eskew	#38	PO Box 25 Desert Center
Wally White		Lake Tamarisk #52
CARL MATTSON	#72	PO BOX 5 DESERT CENTER
Leann Kingsley	#36	P.O. Box 396 Desert center
ANN GODSEY	#11	P.O. Box 94 DC CA 92239
Kay Haisch	#1	PO Box 345 DC 92239
Marta Sneddon		17741 oak st #132. F.V. Calif
DON SNEDDON		26250 PARKVIEW DR. LAKE T.D.R #13
LYNN LEWIS	#35	26250 PARKVIEW #35 LAKE TDR #35
L.E. TILGNER		26250 Parkview #16
MIKE MANSFIELD		26250 PARKVIEW Dr #56
Mark Binion		26250 Parkview #44
Teena Binion		26250 Parkview #44
EDDIE MENDOZA		44020 Shadow way

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

63

6

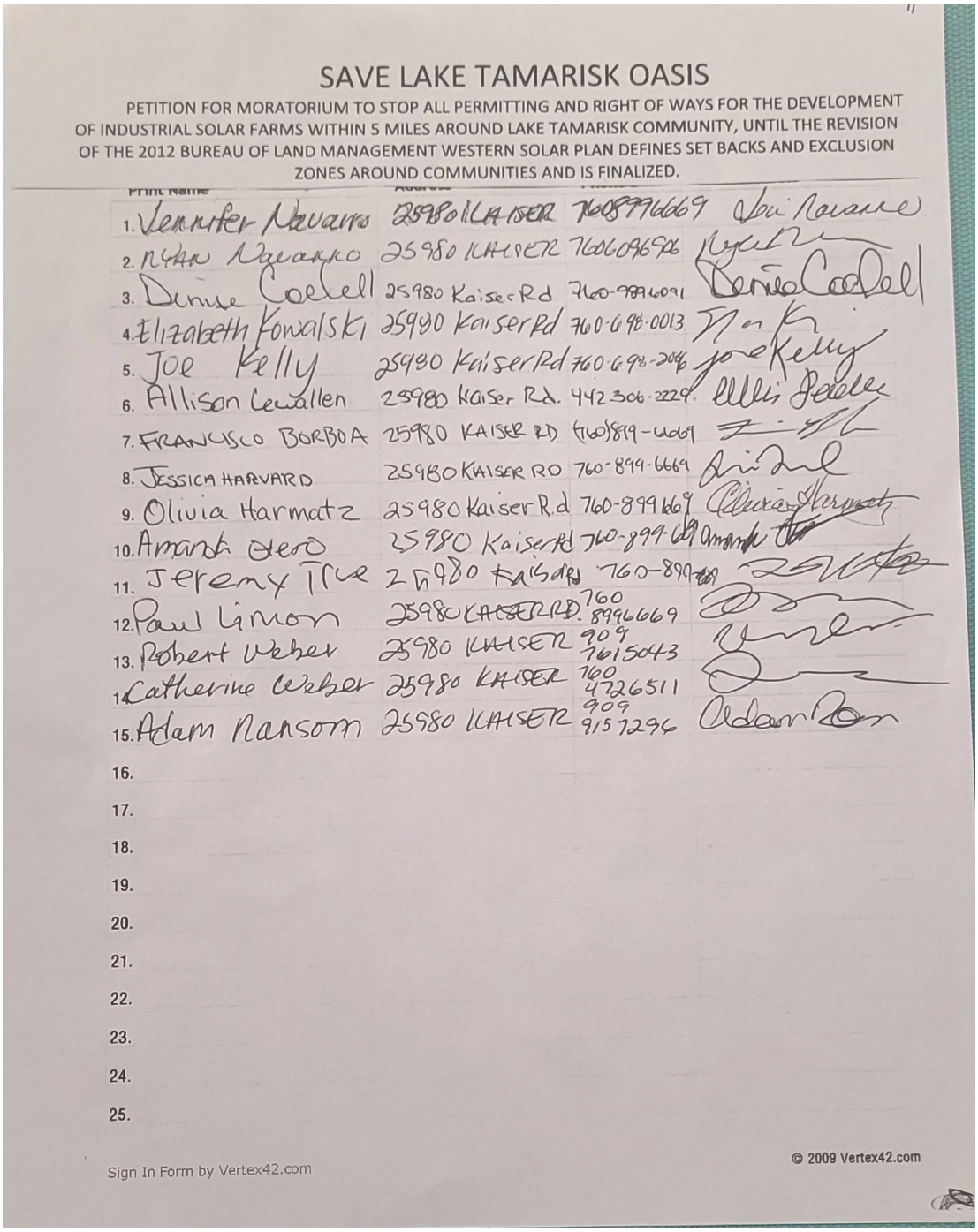
SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME	SIGNATURE	ADDRESS
Diane Pierce	Diane Pierce	26250 Parkview Dr Lot 47 Desert Center, CA
Vicki Bucklin	Vicki Bucklin	Cathlamet, WA 98612 103 N. Welcome Slough
Beverly Haynes	Beverly Haynes	Hughwood Dr Roseburg OR
Tammie Castor		43411 Tamarisk Dr. Desert Center, CA 92239
Renee w Castor		43591 Tamarisk Dr. Desert Center CA 92239
Maria Ramos	Maria Ramos	PO Box 152 Desert Center, CA. 92239
Teri Reynoso		P.O. Box 475 D.C. CA 92239
Shawna Petersen		81853 Argyle La Quinta, CA 92253
Mariana Ordaz	Maria Ordaz	PO Box 554 Desert Center, CA 92239
Mariana Ordaz		PO Box 554 Desert Center, CA 92239
Francisco Ordaz	FRANCISCO ORDAZ	PO Box 554 Desert Center, CA 92239
Greg Sachs		1634 E. Robin Ln Phoenix AZ 85253
Glenn Castor		43591 Tamarisk Dr Desert Center CA 92239
June McArthur	June McArthur	Box 301 Desert Center CA 92239
Ken Griesedieck		26250 Parkview Dr Lot 92 Desert Center
BERNICE SAYRE	Bernice Sayre	Box 73
MELVIN SAYRE		BOX 73 DESERT CENTER
Patrick Kearn	Patrick Kearn	Box 755 Desert Center
Myra Kearn	Myra Kearn	Box 755 Desert Center CA

6

Comment Set D5 – Mark Carrington: Attachment 2 (continued)



SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

Print Name	Address	Phone	Signature
1. Jennifer Navarro	25980 KAISER	7608996669	Jen Navarro
2. Myra Navarro	25980 KAISER	7606096926	
3. Denise Coebell	25980 Kaiser Rd	760-998-4091	
4. Elizabeth Kowalski	25990 Kaiser Rd	760-698-0013	
5. Joe Kelly	25990 Kaiser Rd	760-698-2096	
6. Allison Lewallen	25980 Kaiser Rd.	442 306-2229	
7. FRANCISCO BORBOA	25980 KAISER RD	(760)819-4069	
8. JESSICA HARVARD	25980 KAISER RO	760-899-6669	
9. Olivia Harmatz	25980 Kaiser Rd	760-899-6669	
10. Amanda Herd	25980 Kaiser Rd	760-899-6669	
11. Jeremy True	25980 Kaiser Rd	760-899-6669	
12. Paul Linton	25980 KAISER RD.	760 8996669	
13. Robert Weber	25980 KAISER	909 7615043	
14. Catherine Weber	25980 KAISER	760 4726511	
15. Adam Ransom	25980 KAISER	909 9157296	
16.			
17.			
18.			
19.			
20.			
21.			
22.			
23.			
24.			
25.			

Sign In Form by Vertex42.com

© 2009 Vertex42.com

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

65

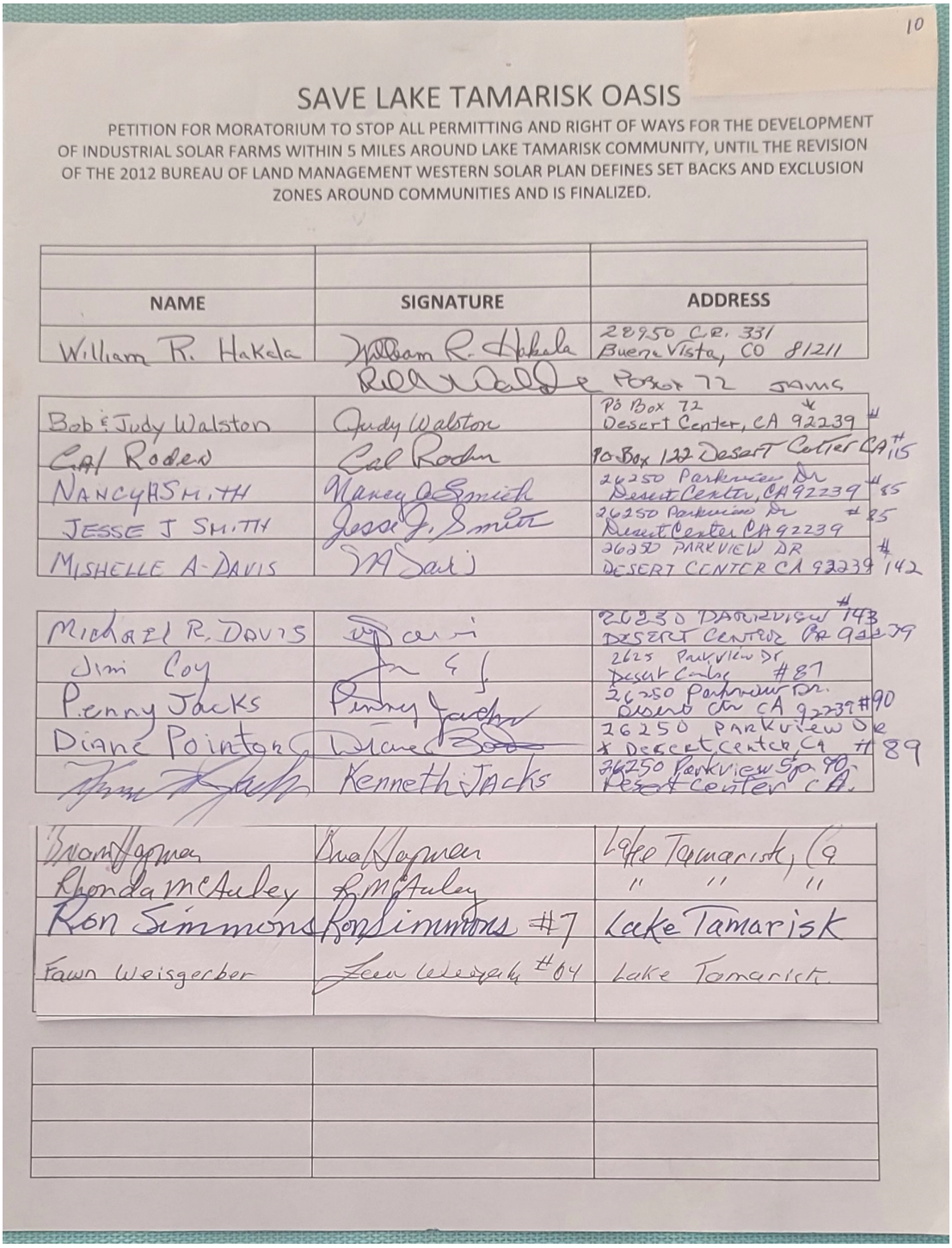
12

SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME Lot #	SIGNATURE	ADDRESS
Randall Miller #98	Randall Miller	26250 Parkview Drive Desert Center, CA 92239
Richard Armstrong #99	Richard Armstrong	Lot 99
SHARRON HILL #54	S. Hill	Lot 54
DONALD PARKER	Don Parker	
Carolyn White	Carolyn White	Lot 52
Macy Thomson	Macy Thomson	Lot 47
Nancy Rothwell	Nancy Rothwell	Lot #34
Keri Riley		Lot #79
William P. Carver		Lot 26
Cynthia A. Carver		✓
CHRISTINA IRIARTE		2373 SPRING OAK WAY SD CA
Jericho Bacolod		7654 NEW SALEM ST SD CA 92126
BENJ SUNGA		8902 PARADALE 92126
Robert Prince		18354 GLASS MTN. Dr. Riverside
DAN McCORMICK		25700 RICE RD. DESERT CENTER CA 92239
Christine Lorer		8413 Aspen Ave Cal City CA 93505
Russel Kies	Russel J. Kies	48016 Piute Pass, Mojave, CA 93501

Comment Set D5 – Mark Carrington: Attachment 2 (continued)



10

SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME	SIGNATURE	ADDRESS
William R. Hakala	William R. Hakala	28950 C.R. 331 Buena Vista, CO 81211
Bob & Judy Walston	Judy Walston	Po Box 72 Desert Center, CA 92239 #
Carl Roden	Carl Roden	PO Box 122 Desert Center CA #115
NANCY H SMITH	Nancy H Smith	26250 Parkview Dr Desert Center, CA 92239 #85
JESSE J SMITH	Jesse J. Smith	26250 Parkview Dr #85 Desert Center CA 92239
MISHELLE A-DAVIS	MA Davis	26250 PARKVIEW DR # DESERT CENTER CA 92239 142
Michael R. Davis		26250 Parkview # 143 Desert Center CA 92239
Jimi Coy		26250 Parkview Dr Desert Center #87
Penny Jacks	Penny Jacks	26250 Parkview Dr. Desert Ctr CA 92239 #90
Diane Pointon		26250 PARKVIEW DR * Desert Center CA # 89
	Kenneth Jacks	26250 Parkview Spa 90 Desert Center CA.
Brian Hagman	Brian Hagman	Lake Tamarisk, CA
Rhonda McAuley	Rhonda McAuley	" " "
Ron Simmons	Ron Simmons #7	Lake Tamarisk
Fawn Weisgerber	Fawn Weisgerber #64	Lake Tamarisk

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

67

14

SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME	SIGNATURE	ADDRESS
Randy Alvarez	Randy Alvarez	Desert Center CA Crystal Way 92239
Mindy Alvarez	Mindy Alvarez	Crystal Way 92239
Montana Alvarez	Montana Alvarez	Crystal Way 92239
Shannon Hovis	Shannon Hovis	25300 Rice rd
Wendi Batchelor	Wendi Batchelor	26501 Green Valley Way 92239
Rich Hovis	Rich Hovis	25300 Rice Rd 92239
Robert Lockhart	Robert Lockhart	43940 Strawberry Way 92239
Logan Bickner	LB	26501 Green Valley way 92239
TO DD Add Son		26501 Green Valley 92239
Oliver Li	Oliver Li	1100 Synergy 1532, Irvine, CA
Minshi Yang		1100 Synergy 1532, Irvine CA.
Charlie Stallard	Charlie Stallard	25950 Rice rd, ca

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

68

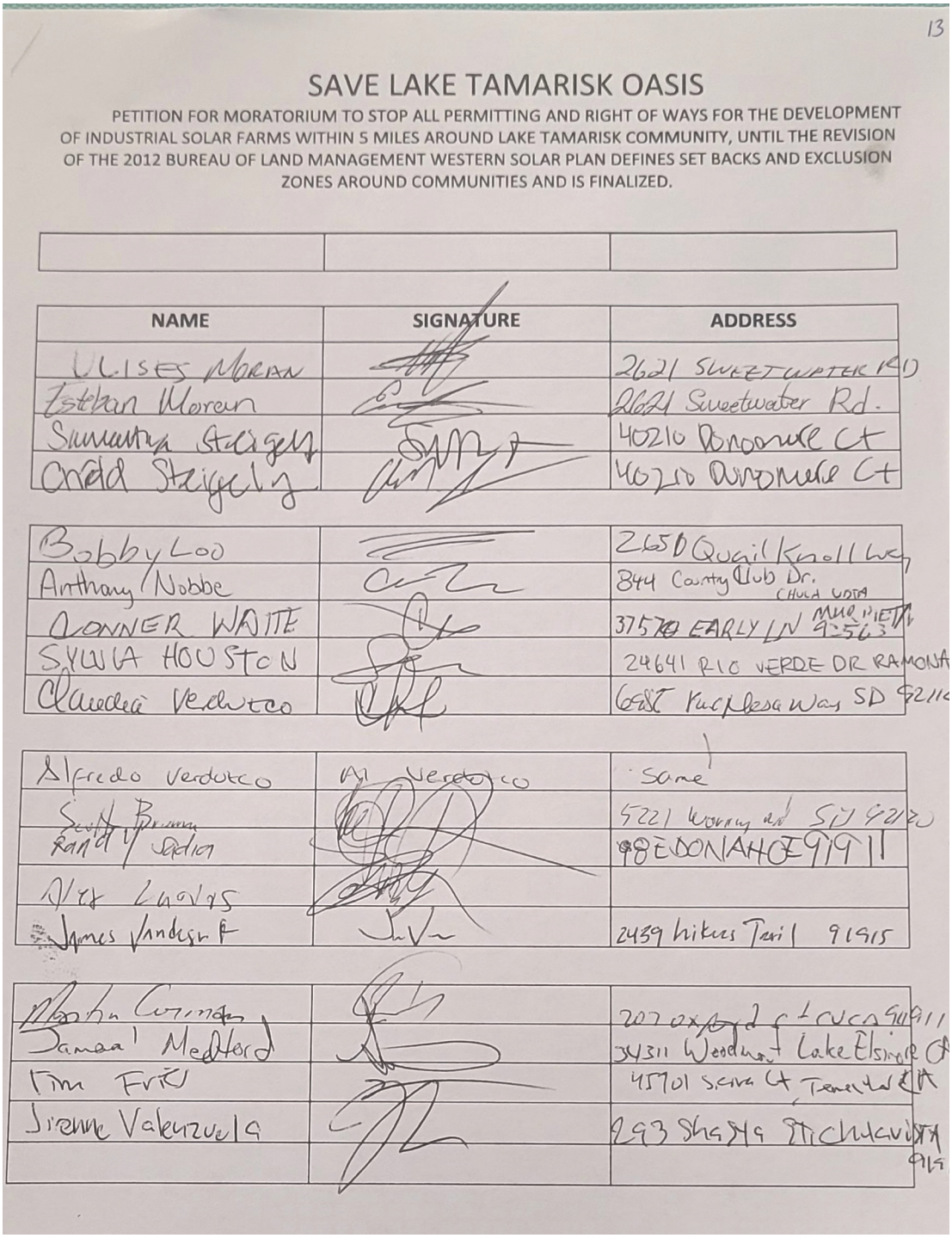
8

SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME	SIGNATURE	ADDRESS
Andrayah Mendoza	Andrayah Mendoza	44020 Shadow way Desert Center, Ca 92239
ROBERT C. MITCHELL		SPACE 24
Mark Carrington	#48	26259 Parkview Dr Desert Center
Jm cochran	John Cochran	44144 clovewer Ct Dr
Eddy Workhoven		#144 26250 Parkview Dr.
JOHN WILMOTH	John T. Wilmoth	#84 26250 PARKVIEW DR
Walt Gambles	W Gambles	#41 26250 Parkview DR.
KATHY SCHOFIELD	KA. Schofield	#123, 26250 Parkview Dr.
BOB BROOKS	Bob Brooks	#60, 26250 PARKVIEW DR. CTDR
Leland Womack	Womack	44081 Shasta Dr.
Margaret Womack	Womack	44081 Shasta Dr
Francesca BARGETZI	F. Bargetzi	44161 Crystal Way
Tracy Brooks		#60, 26250 Parkview Dr
Holly James		#120 - Desert Center
Bruce James		✓
ROSE BLAIR	Rose Blair	#62 26250 PARKVIEW DR
DAVID BLAIR	Blair	62 - 26250 PARKVIEW DR

Comment Set D5 – Mark Carrington: Attachment 2 (continued)



13

SAVE LAKE TAMARISK OASIS

PETITION FOR MORATORIUM TO STOP ALL PERMITTING AND RIGHT OF WAYS FOR THE DEVELOPMENT OF INDUSTRIAL SOLAR FARMS WITHIN 5 MILES AROUND LAKE TAMARISK COMMUNITY, UNTIL THE REVISION OF THE 2012 BUREAU OF LAND MANAGEMENT WESTERN SOLAR PLAN DEFINES SET BACKS AND EXCLUSION ZONES AROUND COMMUNITIES AND IS FINALIZED.

NAME	SIGNATURE	ADDRESS
ULISES MORAN		2621 SWEETWATER RD
Esteban Moran		2621 Sweetwater Rd.
Samantha Steigerwald		40210 Broome Ct
Gerald Steigerwald		40210 Broome Ct
Bobby Loo		2650 Quail Knoll Lane
Anthony Nobbe		844 Country Club Dr. CHULA VISTA
CONNER WHITE		37570 EARLY LN MURRIETA 9:56 3
SYLVIA HOUSTON		24641 RIO VERDE DR RAMONA
Claudia Verduzco		6687 Rancho Vista SD 92114
Alfredo Verduzco		Same
Scott Brown		5221 Wooing rd SD 92120
Randy Sexton		98 EDONAHOE 91911
Alex Lagos		
James Anderson		2459 Hikers Trail 91915
Martha Cummings		207 Oxford Ct Lucas 91911
Samaa' Medford		34311 Woodland Lake Elsinore CA
Tim Fritz		45701 Seiva Ct Temecula CA
Jeanne Valenzuela		293 Shasta Richland WA 99354

Comment Set D5 – Mark Carrington: Attachment 2 (continued)

70

This Page is Left Blank Intentionally