DRAFT ENVIRONMENTAL ASSESSMENT/INITIAL STUDY

Skybridge Eagle Mountain Solar Farm & Green Hydrogen Project

Prepared for

County of Riverside

Technical Support submitted by

Aspen environmental group

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COUNTY OF RIVERSIDE

ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQ/EA) Number: CEQ 220034

Project Case Type(s) and Number(s): Conditional Use Permit (CUP) 220009, and Development Agreement 2200007

Conditional Use Permit No. 220009 and Development Agreement 2200007 proposes a green hydrogen facility, including 50 MW of electrolyzers and a 50 MW solar facility. There's potential expansion of the electrolyzer facility to 500 MW (50 10 MW electrolyzers total).

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Applicant's Name: Skybridge Energy, LLC

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1. PROJECT INFORMATION

Project Description

Skybridge Energy, LLC (Applicant), is proposing development of the Skybridge Eagle Mountain Solar Farm & Green Hydrogen Project (Project) in eastern Riverside County, California. The Applicant would construct, operate, maintain, and decommission a green hydrogen facility consisting of five 10 MW (megawatt) electrolyzers, and a 50 megawatt (MW) solar facility on 133 acres of private land. The Project would generate green hydrogen through the use of on-site generated solar power to power the electrolyzers.

The Project would consist of the following:

- Five 10 MW electrolyzers that would produce 7,500 kg of hydrogen per day.
- 35,000 kilograms (kg) of compressed or liquid hydrogen storage.
- Hydrogen tube trailer loading facility.
- Up to a 50 MW solar photovoltaic (PV) electrical generating facility.
- Two 5,000 square-foot utility and operations buildings, including restrooms and on-site septic.
- An on-site water well and water storage tank sized in accordance with County and CalFire specifications.

There's potential expansion of the electrolyzer facility to 500 MW (50 10 MW electrolyzers total).

The Project would assist with achieving California's renewable energy generation goals under the *Clean Energy and Pollution Reduction Act of 2015* (Senate Bill 350) and the 100 Percent Clean Energy Act of 2018 (Senate Bill 100), as well as greenhouse gas (GHG) emissions reduction goals of the California Global Warming Solutions Act of 2006 (AB 32), as amended by Senate Bill 32 in 2016.

The project would also assist in achieving the Nations renewable initiative goals of being carbon neutral by 2050.

The site has a County General Plan designation of Open-Space Rural and has an existing zoning classification of Controlled Development Areas (W-2-10).

Project Location

The Project is located North of Kaiser Road and East of Power Line Road (adjacent to the Desert Sunlight Solar Plant), approximately 7.3 miles north of I-10 near Desert Center, California, in the Chuckwalla Valley (see Figure 1). The Project application area covers approximately 133 acres of private land for the solar and green hydrogen facilities (see Figure 2 and Figure 3).

The proposed Project layout is illustrated in Figure 2 and 3. As shown in Figure 2, the majority of the 133- acre site would be dedicated to solar panels and electrical collection systems, and the remainder of the site would house the electrolyzer facilities and O&M buildings (see Figure 3). With the exception of required access roads, inverter foundations and underground collection lines, the remainder of the solar panel area would be mowed, grubbed, and leveled where necessary to facility equipment movement; thereby minimizing vegetation clearing and facilitating subsequent site restoration. The hydrogen and O&M areas would be cleared, graded and leveled, and necessary foundations installed.

1.1. Project Components

1.1.1. Green Hydrogen

Overview of Green Hydrogen Technology

Capturing usable hydrogen is accomplished by using large scale electrolyzers; electrolysis is the process by which electricity is utilized to split water into its component elements, hydrogen and oxygen. This process occurs through an electrochemical reaction in an electrolyzer using an anode, cathode, membrane, and electrolyte. Both the hydrogen and oxygen atoms are released as gases. The hydrogen is trapped by the production equipment and stored in either compressed or liquid form to be used as an end product, and the oxygen is either released into the atmosphere or captured for use in consumer products such as soda and beer production. The hydrogen will either be directly injected into the adjacent, existing SoCal Gas natural gas pipeline on-site or temporally loaded and stored in compression or cooled liquid containers for transport to market by hydrogen powered tractor trailers for use in both light and heavy-duty transportation vehicles. The mode of hydrogen transportation would be a function of the hydrogen customer.

The Project electrolyzers will be powered by both the on-site solar facility and by purchasing additional power from external renewable energy generators, delivered to the site by the SCE distribution line. The Project is within an area where the terrain is generally flat, with a warm and arid climate. The Project region is surrounded by mountains and canyons that offer precipitation for recharging the groundwater basin to be used by the Project.

Figure 1. Project Location

Figure 2. Site Plan

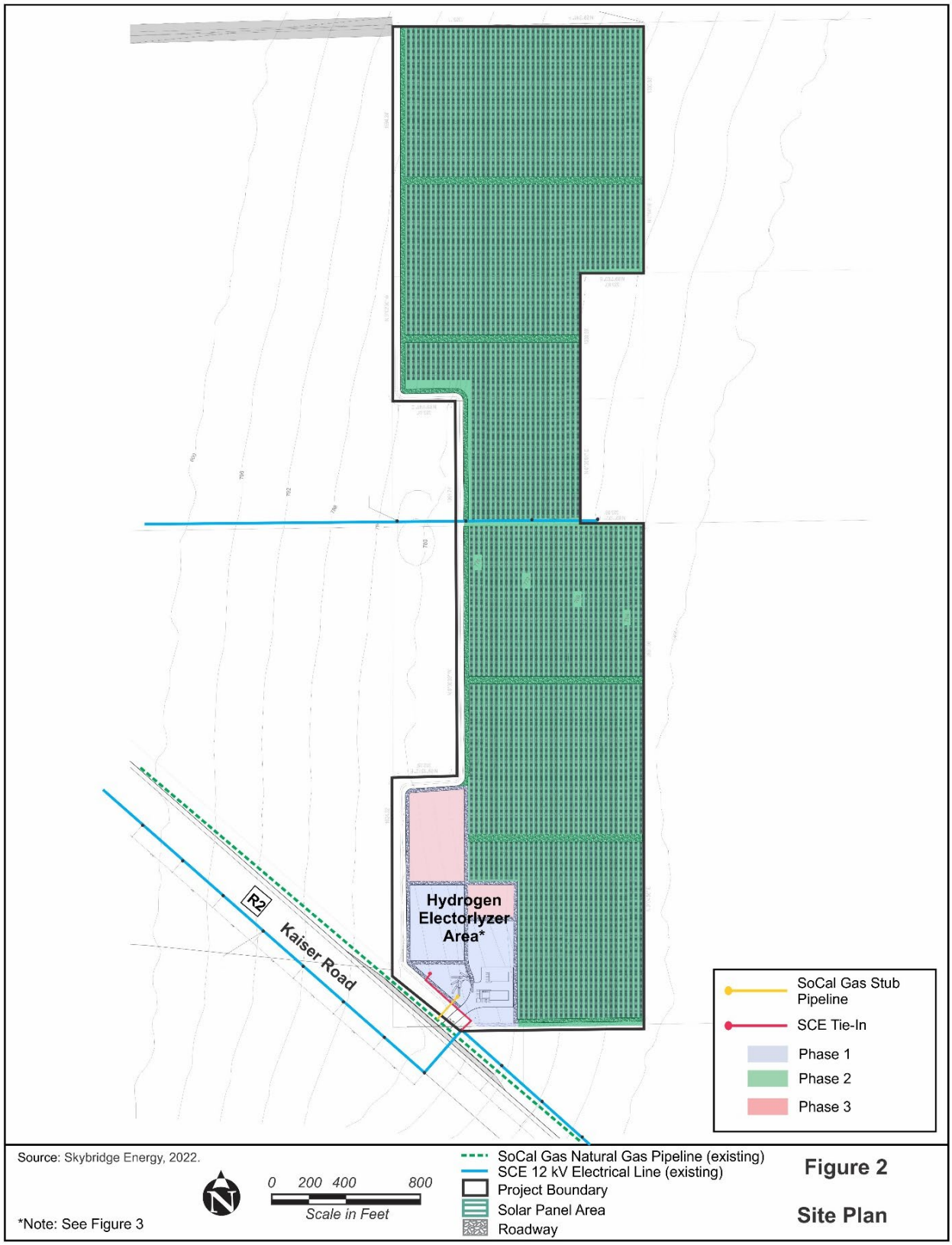
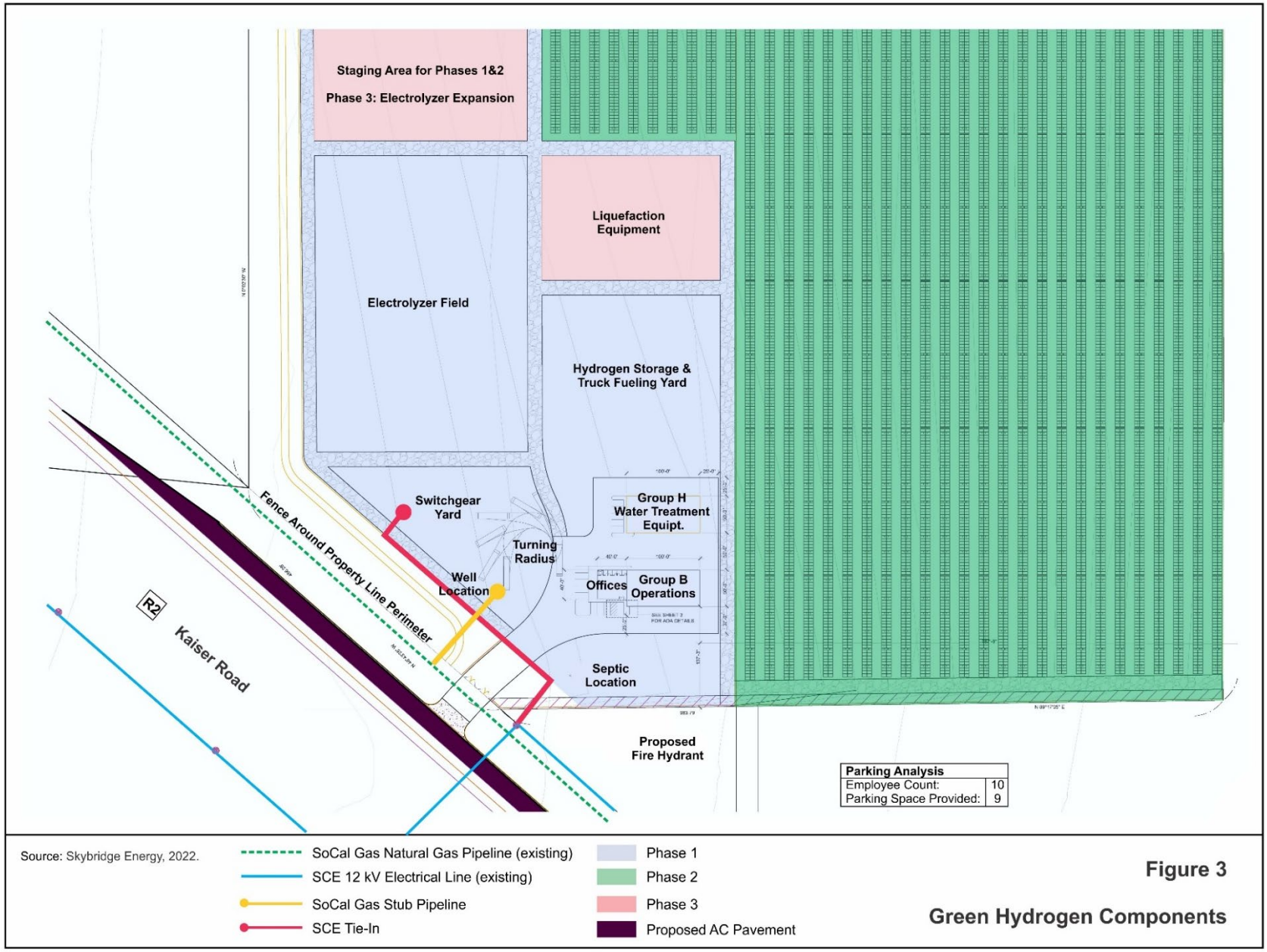


Figure 3. Green Hydrogen Components



Electrolyzers

Initially, the Project would include five 10 MW electrolyzers, powered by the on-site 50 MW solar facility. The solar generation would be supplemented by purchasing additional power from external renewable energy generators. The main green hydrogen specific equipment includes electrolyzers, water treatment equipment, hydrogen storage processing equipment including compressors and liquefaction equipment, injection equipment and truck loading facility (see Figure 3). The layout of the electrolyzers within the Electrolyzer Field will be dependent upon the electrolyzer model chosen at the time of final design for construction.

Additional electrolyzers may be added to a level of 500 MWs of electrolyzer capacity ((50) 10 MW electrolyzers in total). The current market for green hydrogen dictates the expansion of the project and should take into consideration the growth of market and the availability of both additional green electrons and water. The construction staging area would be used for expansion of the electrolyzer field to 500 MW (see Figure 2). The future expansion would be subject to water availability and provision of additional power by SCE. This document analyzes the project at both 50 MW and 500 MW of electrolysis capacity, to capture the "worst-case" impact scenario.

Initial operation of the project would focus on 50 MWs of electrolyzers that have the capacity to produce approximately 27,240 kg of hydrogen per 24-hour period. The Applicant proposes to run the electrolyzers for approximately 20 hours per day, on average, producing approximately 22,726 kg of hydrogen per day.

During operation of the initial 50 MW capacity, the electrolyzers will use 2.4 gallons[1] of water to produce 1 kg of green hydrogen. Running the electrolyzers for 20 hours a day would require approximately 0.17 acre-feet (54,632 gallons) per day. The water source for the electrolyzers would be from an onsite well.

Additional water needs for future electrolyzer expansion will either be satisfied by the Project well or purchased from neighboring wells, or offsite sources such as Lake Tamarisk or the mine storage project above the project site. All drawn groundwater would be from the Chuckwalla Valley Groundwater Basin.

Water Treatment

Water used in the electrolysis process must be demineralized prior to being processed in the electrolyzer. This requires a Water Treatment Plant (WTP) to produce the required demineralized water quality necessary for the electrolysis process. Electrolyzers require approximately 1.2 US gallons of demineralized water for each 1 pound (lb) of hydrogen produced. The WTP would be housed within the Group H Water Treatment Equipment building (see Figure 3).

Electrolyzers require that the groundwater from the approved, future well to be purified before entering the electrolysis process. The Project will consist of a water treatment system to remove the impurities and render it ready for use. The resulting impurities (primarily brine and minerals) will need to be temporarily stored in a code compliant chemical tank (such as the tanks offered by Poly Processing Solutions www.polyprocessing.com) until it can be recycled or disposed of properly. Skybridge will determine what brine and minerals will consist of upon groundwater testing once the well is drilled. The 50 MW's of electrolyzers will use approximately 0.17 acre-feet (54,632 gallons) of water per day. The treatment system may produce as much as 10 ml of brine and minerals per gallon of water, leading to a total accumulation of as much as 120 gallons per day.

As the solution will be considered organic, Skybridge will either sell the solution to an organic waste recycler or hire an environmental firm to transport it to a permitted organic waste processing facility (specific site location to be determined once volume and brine makeup has been determined). If transported off site, this will require approximately one additional truck trip every two weeks to haul the brine away.

[1] 2.4 gallons is approximately equal to 0.000007 acre-feet.

The second option would be to drill an on-site injection well where the resultant brine would be injected deep in the earth. Disposing of the brine via this method would result in the elimination of additional trucking. Skybridge will make a final determination to move forward with this second option based upon the volume of brine produced, the economics of this solution, and the permitting ability of the process.

Hydrogen Storage

If the Project injects hydrogen directly into the adjacent, existing SoCal Gas natural gas pipeline, no on-site storage will take place. Alternatively, up to 1,589 MT of compressed or liquid hydrogen may be stored and located within the Hydrogen Storage and Truck Fueling Yard (see Figure 3). This capacity would allow the storage of seven full days of production, assuming that the electrolyzers are run at full capacity (20 hours per day). The method of onsite hydrogen storage could include hydrogen fuel cells, metal hydride batteries, or other available hydrogen storage technology available at the time of project construction.

Hydrogen Transport

Hydrogen will be directly injected into the adjacent, existing SoCal Gas natural gas pipeline via a stub pipeline (see Figures 2 and 3) or loaded into trailers for delivery to the hydrogen markets. As shown on Figures 2 and 3 the hydrogen stub pipeline would be 140 feet long and would be installed within the areas proposed for disturbance within the Project site and the existing Kaiser Road right-of-way directly adjacent to the Project site. Installation of the stub pipeline would not occur until an Interconnection Agreement is executed with SoCal Gas.

Transportation of hydrogen by truck would include the use of hydrogen tractor trailers that are powered by hydrogen and the resultant byproduct of hydrogen-powered vehicles is pure water (H2O). There would be no direct emissions and a maximum of thirteen truck trips per day to export hydrogen for operations of the initial 50 MW capacity of the Project (5 10 MW electrolyzers). The mode of hydrogen transportation would be a function of the hydrogen customer.

1.1.2. Solar

Overview of Solar Technology

Solar cells, or photovoltaic cells (PV cells), convert sunlight directly into electricity. The PV cell gets its name from the process of converting light (photons) to electricity (voltage), which is called the photovoltaic or PV effect. PV cells are assembled on panels, which are mounted at a fixed angle facing south or on a tracking device that follows the sun's path through the day. Many solar panels on multiple rows combined together and controlled by a single motor create one system called a solar tracker. For large electric utility or industrial applications, hundreds of solar trackers are interconnected to form a utility-scale PV system. The power from the Project's solar panels would be used to power the electrolyzers. The Project would interconnect to the nearby Desert Sunlight Solar Project substation located on the adjacent Desert Sunlight Solar Project site, which allows for import or export of solar power.

Insolation is a measure of solar radiation energy received on a given surface over a given time. It is commonly expressed as an average irradiance in watts per square meter (W/m2) or kilowatt-hours per square meter per day (kWh/m2/day). The region in which the Project site is located receives greater than 6.5 kWh/m2/day of solar radiation energy, giving it a higher level of solar radiation than most areas within the United States (NREL, 2012).

Solar Panels

The proposed solar facility would include approximately 100,000 solar panels (500 W per panel); the final panel count would depend on the technology ultimately selected at the time of procurement. The decision

regarding the panel types and racking systems described here would depend on market conditions and environmental factors, including the recycling potential of the panels at the end of their useful lives.

Types of panels that may be installed include thin-film panels, crystalline silicon panels, or any other commercially available PV technology. Solar thermal technology (which uses focused sunlight as a heat source) is not being considered except for a small amount for the Solid Oxide process (SOCS) required to improve the efficiency of the electrolysis process. The proposed panel mounting system would depend on the PV panels ultimately selected, but the Applicant is currently planning to use a single axis tracker with a portrait (vertical) module orientation. Either mono-facial (single-faced) or bi-facial (two-faced) modules could be used, and modules would either be mounted as single panels or stacked two high.

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

Panels would be arranged on the site in solar arrays along a north-south axis with panels tracking east to west, following the movement of the sun. The Project would be designed and laid out primarily in blocks of approximately 8-12 MW, each occupying approximately 14-20 acres (see Figure 2).

The PV modules would be supported on steel piles (e.g., cylindrical pipes, H-beams, helical screws, or similar), which would be driven into the soil using pneumatic techniques such as a hydraulic rock hammer attachment on the boom of a rubber-tired backhoe excavator. The piles typically would be spaced 10 feet apart. For a single-axis tracking system, piles would be installed to a reveal height of approximately 4 feet above grade (but could be higher to compensate for terrain variations and clearance due to water/ flooding). Following pile installation, for single-axis tracking systems, the associated motors, torque tubes, and drivelines (if applicable) would be placed and secured. Some designs allow for PV panels to be secured directly to the torque tubes using appropriate panel clamps. For some single-axis tracking systems, a galvanized metal racking system, which secures the PV panels to the installed steel piles, would then be field-assembled and attached according to the manufacturer's guidelines.

Inverters, Transformers, and Electrical Collection System

The final module block sizes would depend on available technology and market conditions. Each 8-12 MW block would include an inverter-transformer station constructed on a concrete pad or steel skid centrally located within the PV arrays occupying approximately 1,000 square feet. Each inverter-transformer station would contain up to six inverters, a transformer, a battery enclosure, and an 8- to 11-foot-high switchboard. The color of the inverter equipment would be standard desert tan, depending on availability from the manufacturer.

The pads would contain a security camera at the top of an approximately 20-foot wood or metal pole. If required based on site meteorological conditions, an inverter shade structure would be installed at each pad.

Panels would be electrically connected in panel strings using wiring secured to the panel racking system. Underground cables would be installed to convey the direct current (DC) electricity from the panels to combiner boxes located throughout the PV arrays, from where it would go to inverters to convert the DC to alternating current (AC). The output voltage of the inverters would be stepped up to the collection system voltage of 34.5 kV by pad mounted transformers located in proximity to the inverters. The 480V collection conductors would be buried in conduit underground within the solar facility. This generated solar power would be delivered to the electrolyzer facility via the switchgear yard (see Figure 3).

1.1.3. Other Facilities

Office and Operations Building

An office and operations building would be constructed at the Project site (see Figure 3). The building would be designed for project security, employee offices, and parts storage. The approximately 5,000 square-foot office and operations building would be approximately 25 feet at its tallest point. The on-site buildings would include restrooms that link to an on-site septic system. The building would be constructed on a concrete foundation.

Water Treatment Equipment Building

A second building, in addition to the office and operations building, would be constructed as part of the Project. This building would contain the water treatment equipment such as the water purification system, including WTP. The approximately 5,000 square-foot production equipment building would be approximately 25 feet at its tallest point.

SCE Tie-In

An electrical tie-in would be established with the existing Southern California Edison (SCE) power line directly adjacent to the Project site (see Figures 2 and 3). The provision of power by SCE would supplement that generated by the Project solar facility.

12 kV Electrical Distribution Line

Electrical power for the onsite buildings would be supplied via a new overhead or underground 12 kV distribution line extending from the existing SCE distribution system adjacent to the solar facility site. Alternatively, on-site generated electricity may be used for purposes of powering the onsite buildings.

SCADA and Telecommunications Facilities

The facility would be designed with a comprehensive SCADA system to allow remote monitoring of facility operation and/or remote control of critical components. The fiber optic or other cabling required for the monitoring system typically would be installed in buried conduit within the access road leading to a SCADA system cabinet within the O&M buildings. External telecommunications connections to the SCADA system cabinets could be provided through wireless or hard-wired connections to locally available commercial service providers. The Project's SCADA system would interconnect to an external fiber optic network at the on-site switchgear yard, and no additional disturbance associated with telecommunications is anticipated.

Facility Site Security and Fencing

Controlled Access. The entrance to the facility would be accessed by deceleration and acceleration lanes on either side of the driveway (see Figure 3). Once past the entrance gate, the road encircles the two operations buildings allowing access to the electrolyzer facilities and staging area. From the back side of the buildings, a road will lead to the solar array to provide O&M access. The roads in the array will follow a gridded pattern through the panels to ensure proper maintenance can be carried out. All ingress and egress road materials will be decomposed granite or a similar pervious surface.

Fencing. The entire property would be enclosed by fencing for security and safety purposes. Additionally, the production equipment, the storage yard, and the electrical utility equipment area will have their own fence, restricting access to those areas. The fences would be up to 10 foot-high, and would be perimeter fences, topped with one foot of three strand barbed wire.

Other Security Measures. Off-site security personnel could be dispatched during nighttime hours or could be on site, depending on security risks and operating needs. Infrared security cameras, motion detectors, and/or other similar technology would be installed to allow for monitoring of the site through review of live footage 24 hours a day, 7 days a week. Such cameras or other equipment would be placed along the perimeter of the facility and/or at the inverters. Security cameras located at the inverters would be posted on poles approximately 20 feet high.

1.2. Project Construction

1.2.1. Construction Schedule and Workforce

Project construction would occur over three phases taking approximately 3 months each, or 9 months total. At the end of its useful life the Project would be decommissioned, and the land returned to its pre-project condition to the extent feasible. Revegetation would be attempted, although revegetation success would be subject to the microclimatic conditions in the area at the time of decommissioning.

Construction would take place in three phases where construction of each phase would require approximately three months. The first phase would allow for immediate production of hydrogen and encompasses the operational portion of the facility that would include the grid connection, electrical gear, electrolyzers, and hydrogen production, and processing and storage equipment and buildings (see Section 1.2.3 for additional detail). The second phase of construction would include the solar array (see Section 1.2.4 for additional detail). The third phase would expand hydrogen electrolyzers into the staging area at a future date. It is anticipated that the first two construction phases would occur immediately sequential, and that the third construction phase would occur sometime in the future subject to water availability and provision of additional power by SCE.

The on-site construction workforce would consist of laborers, craftsmen, supervisory personnel, supply personnel, and construction management personnel. The on-site workforce is expected to be approximately 10-30 individuals depending on the construction task being performed.

Construction equipment would operate Monday through Friday between 7:00 a.m. and 7:00 p.m., with a daily maximum of up to 8 hours per piece of equipment. Saturday construction work is not expected to be required, but may occur on occasion, depending on schedule considerations. Similarly, if nighttime, Sunday or holiday construction is performed, a variance to the Riverside County Noise Ordinance would be secured.

1.2.2. Pre-Construction Activities

A number of activities would be undertaken to prepare the site and crews for construction. These pre-construction activities are described below.

Environmental Resource Surveys

Qualified biologists would conduct pre-construction surveys for sensitive species. Sensitive resource areas would be flagged so they are avoided or appropriately managed during construction. A temporary desert tortoise exclusion fence would be erected around work areas, and desert tortoise clearance surveys would be performed in accordance with the United States Fish and Wildlife Service's (USFWS) protocol. If necessary, desert tortoise, other wildlife, and certain types of qualifying cacti would be removed from the site and relocated so that construction and necessary conservation work can be conducted in the work area.

Any identified cultural resources would also be flagged in advance of any ground-disturbing activities, and environmental monitoring would occur during such activities.

Geotechnical Evaluation

The Applicant has conducted a full geotechnical investigation, with the final geotechnical report prepared in June 2022. The geotechnical evaluation gathered information on the physical properties of the soil and rock for use in the final design of the facility. The subsurface scientific testing and analysis included geotechnical borings, trenching, and pile testing.

Surveying, Staking, and Flagging

Pre-construction field survey work would include identifying precise locations of the site boundary, security fence, and ROW boundary. These features would be subsequently staked in the field. No paint or permanent discoloring agents would be applied to rocks or vegetation to indicate survey or construction limits.

Environmental Awareness Training

Under the Project's Worker Environmental Awareness Program (WEAP), prior to construction, all contractors, subcontractors, and project personnel would receive training regarding the appropriate work practices necessary to effectively understand and implement the biological commitments in the Project description; implement the mitigation measures; comply with applicable environmental laws and regulations; avoid and minimize impacts; and understand the importance of these resources and the purpose and necessity of protecting them.

Establishment of Construction Staging Area

The construction staging area is located directly north of the electrolyzer field (see Figure 3), and would be surveyed and monitored by qualified biologists, archaeologists, and tribal monitors, as appropriate, prior to its establishment and during its use.

1.2.3. Phase 1 of Construction: Green Hydrogen Facility

Hydrogen Facilities

The initial construction activities for the hydrogen facilities will include mobilization of equipment, clearing of vegetation, site grading and compaction, and foundation installation in accordance with Riverside County building standards. Site preparation activities also would include construction of drainage components to capture and direct stormwater flow around the hydrogen facilities. Once the concrete foundations are in place for the facilities, the electrolyzer(s), WTP, storage and truck loading systems, and other electrical equipment would be mounted and installed. Equipment would be delivered to the site on trucks.

SCE Tie-in and SoCal Gas Stub Pipelines

The tie-in to the existing SCE line would occur with an overhead extension of the power line from the switchyard to the existing SCE pole as shown on Figure 3. The stub pipeline to the SoCal Gas pipeline would be installed underground along the alignment shown in Figures 2 and 3, within proposed disturbance areas within the Project site and the Kaiser Road right-of-way. Construction of the SCE tie- in and SoCal Gas stub pipeline would occur within the initial phase of site development (hydrogen facility construction).

Other Facilities

Construction of the O&M buildings, switchgear yard, and 12 kV distribution line connection would be part of the initial facility development in tandem with the hydrogen facility construction. The construction activities associated with the distribution line would be similar to the medium voltage collector lines

described below. The sites of the switchgear yard, and water treatment equipment buildings would be cleared and graded, followed by installation of concrete foundations and equipment installation.

Erosion and Sediment Control and Pollution Prevention

A Stormwater Pollution Prevention Plan (SWPPP) or SWPPP-equivalent document would be prepared by a qualified engineer or erosion control specialist and would be implemented before and during construction. The SWPPP would be designed to reduce potential impacts related to erosion and surface water quality during construction activities and throughout the life of the facility. It would include Project information and best management practices (BMP). The BMPs would include stormwater runoff quality control measures, concrete waste management, stormwater detention, watering for dust control, and construction of perimeter silt fences, as needed.

1.2.4. Phase 2 of Construction: Solar Facility

Photovoltaic Panel System Construction

Upon mobilization of equipment, the solar facility would be mowed, grubbed and leveled where needed to facilitate equipment movement, and associated roadways constructed. The structures supporting the PV module arrays would consist of steel piles (e.g., cylindrical pipes, H beams, or similar) driven into the soil using pneumatic techniques, similar to a hydraulic rock hammer attachment on the boom of a rubber-tired backhoe excavator. The piles typically are spaced 10 feet apart. For a single-axis tracking system, piles typically would be installed to a reveal height of approximately 4 to 6 feet above grade, while for a fixed-tilt system the reveal height would vary based on the racking configuration specified in the final design. For single-axis tracking systems, following pile installation the associated motors, torque tubes, and drivelines (if applicable) would be placed and secured. Some designs allow for PV panels to be secured directly to the torque tubes using appropriate panel clamps. For some single-axis tracking systems and for all fixed-tilt systems, a galvanized metal racking system, which secures the PV panels to the installed foundations, would then be field-assembled and attached according to the manufacturer's guidelines.

Inverters, Transformers, and Electrical Collector System

Direct current (DC) lines would be installed in the conduits. The lines would be collected and combined from the arrays and routed to the inverters to be converted to alternating current (AC). Within the arrays this wiring would typically be hung from the racking equipment. Final sections would be connected to the inverters via an underground stub. Trenches for the collector lines would be run from the inverters to the collector substation.

Electrical inverters would be placed on steel skids, elevated as necessary with steel piles to allow for hydrologic flows beneath the inverter structures. Commissioning of equipment would include testing, calibration of equipment, and troubleshooting. The substation equipment, inverters, collector system, and PV array systems would be tested prior to commencement of commercial operations. Upon completion of successful testing, the equipment would be energized.

Collector cabling connecting to the switchyard would be installed either underground, or overhead along panel strings in a CAB system to avoid the need for underground cabling and trenching. At the end of panel strings, cables would be combined and routed overhead on wood poles roughly 30 to 50 feet high, depending on voltage.

Underground cables would be installed using direct bury equipment and/or ordinary trenching techniques, which typically include a rubber-tired backhoe excavator or trencher. An underground 480 V line would likely be buried according to Riverside County Building and Safety required depths (typically 20 – 36") and include horizontal drilling to avoid environmental resources. Shields or trench shoring would be temporarily installed for safety to brace the walls of the trench, if required based on the trench depth.

After the excavation, cable rated for direct burial would be installed in the trench, and the excavated soil would be used to fill the trench and compress to 90 to 95 percent maximum dry density or in accordance with final engineering.

Construction-Related Grading and Vegetation Management

Mass grading would not be conducted on the Project site, instead, the mow and grub approach would be used. The solar array areas would require mowing and rolling of woody vegetation to a height of 12 inches in an effort to preserve vegetation and provide for better and faster post-construction site revegetation. In some locations, root balls would need to be removed, which would require light grading/leveling. Woody vegetation, such as palo verde trees, that are located in areas adjacent to infrastructure where it would not impact solar panel performance would be partially cut, leaving the lower trunk intact to allow regrowth of branches and leaves. Any areas of the site with highly irregular topography that provides important hydrologic functions to the site would be avoided by Project design. Other irregular areas would be more-or-less leveled or smoothed to provide for construction access and installation.

Limited site cut and fill would be approximately balanced, resulting in minimal import/export of earth. On-site pre-assembly of trackers would take place in the staging area.

1.2.5. Construction Access, Equipment, and Traffic

All materials for the Project's construction would be delivered by truck. A majority of truck traffic would occur on designated truck routes and major streets. Flatbed trailers and trucks would be used to transport construction equipment and construction materials to the site. Project components would be assembled on site. Traffic resulting from construction activities would be temporary and could occur along area roadways as workers and materials are transported to and from the Project site. Materials deliveries during construction would travel up to 150 miles one way from source to the Project site.

Construction of the Project includes site preparation, delivery of equipment and supplies, assembling the major equipment and structures, and start-up/testing. These construction activities are anticipated to take approximately 6 months, using a maximum of 10 workers. It is assumed that each worker would drive separately and would all work the same daytime shift. In addition, the Project is estimated to generate on average 32 daily trips during the construction phase for crew, materials, and equipment delivery.

Flagging operations at site access points may be implemented during construction if/when traffic control needs are indicated through either monitoring traffic operations during construction or determined to be required during construction stage planning.

Table 1 Off Road Equipment and Table 2 Construction Vehicles show the off-road equipment and construction vehicles that would be used during Project construction, respectively.

Table 1. Off Road Equipment

Construction Activity	Equipment Type	Fuel Type	Engine Tier	Number Per Day	Hours Per Day	Horsepower
Site Preparation	Rubber Tired Dozers	Diesel	Average	3	8	367
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	4	8	84.0
Grading	Excavators	Diesel	Average	2	8	36.0
Grading	Graders	Diesel	Average	1	8	148
Grading	Rubber Tired Dozers	Diesel	Average	1	8	367
Grading	Scrapers	Diesel	Average	2	8	423
Grading	Tractors/Loaders/Back hoes	Diesel	Average	2	8	84.0
Building Construction	Cranes	Diesel	Average	1	7	367

Construction Activity	Equipment Type	Fuel Type	Engine Tier	Number Per Day	Hours Per Day	Horsepower
Building Construction	Forklifts	Diesel	Average	3	8	82.0
Building Construction	Generator Sets	Diesel	Average	1	8	14.0
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3	7	84.0
Building Construction	Welders	Diesel	Average	1	8	46.0
Paving	Pavers	Diesel	Average	2	8	81.0
Paving	Paving Equipment	Diesel	Average	2	8	89.0
Paving	Rollers	Diesel	Average	2	8	36.0
Architectural Coating	Air Compressors	Diesel	Average	1	8	37.0

Source: Appendix A: AQ, GHG, and Water Usage Impacts Letter Report (Yorke 2022)

Table 2. Construction Vehicles

Construction Activity	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	4.20	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	1.64	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	0.84	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

Source: Appendix A: AQ, GHG, and Water Usage Impacts Letter Report (Yorke 2022)

1.2.6. Post Construction Cleanup

The site would be kept in an orderly condition throughout the construction period by using approved enclosed refuse containers to prevent trash from distributing across the site and becoming an attractant to wildlife. All refuse and trash would be removed from the site and disposed of. No open burning of construction trash would occur. All vegetation that may interfere with equipment would be trimmed and removed using manual non-mechanical means or sprayed with an approved herbicide, as necessary.

1.2.7. Construction Site Stabilization and Restoration

Following the completion of major construction, temporarily disturbed areas would be revegetated pursuant to an approved Restoration Plan. The Plan would describe the Applicant's strategy to minimize adverse effects on native vegetation, soils, and habitat. Where necessary, native re-seeding or vertical mulching techniques to alleviate compaction would be used. However, it is anticipated that many species will regenerate post-construction due to preservation of desert vegetation during the construction phase.

At the conclusion of restoration activities, any previously relocated plants and wildlife would be reintroduced to the Project site and monitored for safety and health.

1.2.8. Internal Roadway System

The Project's on-site roadway system would encircle the two operations buildings allowing access to the buildings and adjacent yards. From the back side of the buildings, a road will lead to the solar array to provide O&M access. The roads in the array will follow a grid pattern through the panels to ensure proper maintenance can be carried out. All ingress and egress road materials will be decomposed granite (DG) or similar pervious surface.

The roads would be approximately 20 feet wide and constructed to be consistent with facility maintenance requirements and County standards. Gates would be approximately 40-50 feet wide. These roads would provide a fire buffer, accommodate Project O&M activities such as cleaning of solar panels, and facilitate on-site circulation for emergency vehicles. Dust control would be implemented as necessary to mitigate dust plumes.

1.2.9. Waste Generation

Waste would be stored in a locked container within the secure temporary staging area (see Figure 3). As there would be regulated hazardous materials on site, storage procedures would be dictated by a Hazardous Materials Plan that would be developed prior to construction. Spill prevention measures and secondary containment would be implemented as part of the Project where warranted; however, strict compliance under 40 CFR 112 or CWA Section 311 would not be required, because there would be no discharges to waters of the U.S. (i.e., navigable waterways or shorelines).

Trucks and construction vehicles would be serviced at off-site facilities but may be refueled on site. The use, storage, transport, and disposal of hazardous materials used in construction of the facility would be carried out in accordance with federal, state, and county regulations. No extremely hazardous substances (i.e., those governed pursuant to Title 40, Part 335 of the Code of Federal Regulations) are anticipated to be produced, used, stored, transported, or disposed of as a result of Project construction. Safety Data Sheets for all applicable materials present on site would be made readily available to on-site personnel.

Construction materials would be sorted on site throughout construction and transported to appropriate waste management facilities. Recyclable materials would be separated from non-recyclable items and stored until they could be transported to a designated recycling facility in accordance with recycling standards and regulations at the time at completion of construction. It is anticipated that at least 20 percent of construction waste would be recyclable. Wooden construction waste (such as wood from wood

pallets) would be sold, recycled, or chipped and composted. Other compostable materials, such as vegetation, might also be chipped and spread on site or composted off site. Non-hazardous construction materials that cannot be reused or recycled would likely be disposed of at municipal county landfills. Hazardous waste and electronic waste would not be placed in a landfill, but rather would be transported to a hazardous waste handling facility (e.g., electronic-waste recycling). All contractors and workers would be educated about waste sorting, appropriate recycling storage areas, and how to reduce landfill waste.

1.2.10. Fire Safety During Construction

Fire protection would be provided to limit risk of personnel injury, property loss, and possible disruption of the electricity generated by the Project. Fire protection would include minimizing flammable materials in the solar field, such as vegetation.

A comprehensive Fire Management and Prevention Plan will be prepared for construction, operation, and decommissioning of the facility. The plan will follow the published guidance of the U.S. Department of Energy for hydrogen facilities and in conjunction with the Riverside Fire Department. Of concern are fire-safe construction, including during any welding, reduction of ignition sources, control of fuel sources, availability of water, and proper maintenance of firefighting systems.

Vegetation would be cleared for construction of the drainage controls, including berms if needed. Construction of the Project would involve preparation, installation, and testing of electrical components such as cables, inverters, wiring, modules, and transformers. Wires would be buried at B&S required standards (typically 20 – 36”) below grade, minimizing the potential for faulty wiring to ignite a fire. All electric inverters and the transformer would be constructed on concrete foundation structures or steel skids and tested prior to use to ensure safe operations and avoid fire risks. Prior to wire setup, work areas would be cleared of vegetation to reduce the risk of ignition from any vehicles or equipment. Small quantities of hazardous chemicals such as fuels and greases would be stored at the site during construction. They would be stored in appropriate containers in an enclosed and secured location with secondary containment to prevent leakages and accidental fires.

Fire extinguishers and other portable fire-fighting equipment would be available on site, as well as additional water for use at the O&M facility. These fire extinguishers would be maintained in accordance with local and federal Occupational Safety and Health Administration (OSHA) requirements.

Locations of portable fire extinguishers would include, but not be limited to, office spaces, hot work areas, flammable storage areas, and mobile equipment such as work trucks and other vehicles. Fire-fighting equipment would be marked conspicuously and be accessible. Portable equipment would be routinely inspected, as required by local and federal laws, ordinances, regulations, and standards, and replaced immediately if defective or needing charge.

1.2.11. Water Use (Construction)

Water for construction-related dust control and operations would be obtained from an on-site groundwater well.

During the construction phase, it is anticipated that a total of up to 5.2 acre-feet (1.7 million gallons) of water would be used for dust suppression, truck wheel washing, and other purposes during the 9-month construction period. During construction, restroom facilities would be portable units to be serviced by licensed providers.

1.3. Operations and Maintenance

Upon commissioning, the Project would begin operations. The solar modules at the site would operate during daylight year-round, and the green hydrogen facility would operate at minimum 6 hours a day, 7

days a week. If affordable offsite renewable power can be secured, the electrolyzers would also be operated from 9:00 p.m. to 11:00 a.m. Other operational activities at the Project site would include:

- Solar module washing and scheduled maintenance (twice annually);
- Vegetation, weed, and pest management;
- Security;
- Regular maintenance of facilities;
- Regular maintenance of hydrogen equipment by trained and qualified technicians;
- Responding to automated electronic alerts based on monitored data, including actual versus expected tolerances for system output and other key performance metrics; and
- Communicating with customers, transmission system operators, and other entities involved in facility operations.

1.3.1. Operations and Maintenance Workforce

During operation of the proposed Project, up to 10 permanent staff could be on the site throughout the day for ongoing facility maintenance and repairs. Two permanent office staff and four O&M staff would be on-site during daylight hours. Additionally, if the electrolyzers are operated at night, an additional 4 O&M staff would be on-site. Security personnel would be on-call. These personnel are expected to be drawn from nearby communities in Riverside County. The O&M building would house the security monitoring equipment, inclusive of security cameras feeds for monitoring the Project 24 hours per day.

1.3.2. Traffic

Once operational, the Project would include up to 10 full-time employees, with 6 employees being onsite during daylight hours and 4 being onsite at night (see Section 1.4.1 above). It is assumed that each worker would drive separately. The Project is estimated to generate 20 daily employee vehicle trips with 10 trips in the AM peak-hour and 10 trips in the PM peak-hour during operations. Additional trips would occur throughout the day, including hydrogen tube trucks and other deliveries. These trips would average 20-30 per day.

In total, accounting for employees, deliveries, and export of hydrogen, it is estimated that the Project would generate, on average, approximately 45 daily vehicle trips during operation (see Table 3). Vehicle trip lengths would average approximately 50 miles each direction. Table 3 presents the vehicle trips and vehicle miles travelled for the Project during operation.

Table 3. Operational Vehicle Trips

Land Use Type	Trips per Weekday	Trips per Saturday	Trips per Sunday	Trips per Year	Average Trips per Day	VMT per Weekday	VMT per Saturday	VMT per Sunday	VMT per Year	Average VMT per Day
General Heavy Industry	39.3	64.2	50.9	16,248	44.5	2,046	3,342	2,650	845,863	2,317

1.3.3. Site Maintenance

The Project site maintenance program would be largely conducted during daytime hours but panel washing could occur at night to minimize time panels would be offline during daylight hours. Likewise, equipment repairs could take place in the early morning or evening when the solar plant would be producing the least amount of energy, and when the electrolyzers are not producing hydrogen. Key program elements would include maintenance activities originating from the on-site O&M facility.

Maintenance for the solar facility typically would include panel repairs; panel washing; maintenance of transformers, inverters, energy storage system, and other electrical equipment; road and fence repairs;

and vegetation and pest management. Solar modules would be washed as needed (approximately two times each year) using light utility vehicles with tow-behind water trailers to maintain optimal electricity production. No chemical agents would be used for module washing. The Applicant would recondition roads up to approximately once per year, such as after a heavy storm event that may cause destabilization or erosion.

Maintenance for the green hydrogen facility would typically include:

1. The fuel cell stacks (the core of the electrolyzer) that is contained in a sealed module that does not need to be opened or serviced.
2. The addition of any electrolyte or chemicals such as alkaline.
3. The mechanical Balance of Plant (BOP) will require typical maintenance for pumps, filters, etc. (not significant).

On-site vegetation would be managed to ensure access to all areas of the site, reduce fire risk, and to help screen Project elements as needed. On-site vegetation may be trimmed approximately once every three years, as needed. For the first year, weed management and control would be performed quarterly. For the next two to four years, weed control would be performed annually in compliance with an Integrated Weed Management Plan.

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

Long-term maintenance schedules would be developed to arrange periodic maintenance and equipment replacement in accordance with manufacturer recommendations. Solar panels are warranted for 25 years or longer and are expected to have a life of 50 or more years, with a degradation rate of 0.6 percent per year. Moving parts, such as motors and tracking module drive equipment, motorized circuit breakers and disconnects, and inverter ventilation equipment, would be serviced on a regular basis, and unscheduled maintenance would be performed as necessary. Electrolyzers are warranted for 10 years and are expected to have a life of 20 years. During those 20 years, the fuel cell module (referenced above) will be required to be replaced at a certain periodicity, or rather when the performance decrees below predetermined limits. For the first replacement cycle, this period is expected to be 3-5 years and Skybridge will execute a long-term service agreement with the OEM to insure long-term performance of the equipment. Life of the solar field would be a minimum of 30 years.

1.3.4. Fire Safety During Operation

Solar arrays and PV modules are fire-resistant, as they are constructed largely of steel, glass, aluminum, or components housed within steel enclosures. As the tops and sides of the panels are constructed from glass and aluminum, PV modules are not vulnerable to ignition from firebrands from wildland fires. In a wildfire situation, the panels would be rotated and stowed in a panel-up position. The rotation of the tracker rows would be controlled remotely via a wireless local area network. All trackers could be rotated simultaneously in a hazard situation.

As with the construction period, fire protection would be provided to limit risk of personnel injury, property loss, and possible disruption of the electricity generated by the Project. Fire protection would include minimizing flammable materials in the solar field, such as vegetation.

Similarly, a comprehensive Fire Management and Prevention Plan will be prepared for construction, operation, and decommissioning of the facility. The plan will follow the published guidance of the U.S. Department of Energy for hydrogen facilities and in conjunction with the Riverside Fire Department. Skybridge will also submit a Business Emergency Plan that explains the safety protocols and procedures

for the safe handling of generated and stored hydrogen on site, the plan will include measures to safeguard human life, preventing personnel injury, preserve property and minimize downtime due to fire or explosion. Of concern are fire-safe control of fuel sources, reduction of ignition sources, availability of water, and proper maintenance of firefighting systems.

Vegetation and electrical systems would continually be maintained during operations to avoid fire concerns. Small quantities of hazardous chemicals such as fuels and greases for operations and maintenance equipment will be stored in appropriate containers in an enclosed and secured location within the O & M building with secondary containment to prevent leakages and accidental fires.

Fire extinguishers and other portable fire-fighting equipment will be available on site, as well as additional water for the purpose of fire suppression. Fire extinguishers will be maintained in accordance with local and federal Occupational Safety and Health Administration (OSHA) requirements.

Locations of portable fire extinguishers will include, but not be limited to, office spaces, hot work areas, flammable storage areas, and mobile equipment such as work trucks and other vehicles. Fire-fighting equipment would be marked conspicuously and be immediately accessible. Portable equipment would be routinely inspected, as required by local and federal laws, ordinances, regulations, and standards, and replaced immediately if defective or needing charge.

Fire safety and suppression measures, such as smoke detectors and extinguishers, would be installed and available at and around all buildings and production areas as required by the Riverside County Fire Department.

As described above, a Fire Management and Prevention Plan will be prepared in coordination with the Riverside Fire Department or other emergency response organizations to identify the fire hazards and response scenarios that may be involved with operating the facility. This would include information on response to accidents involving downed power lines, damage to solar arrays, all hydrogen related equipment and facilities. Additionally, site lights will be installed throughout the facility for safe and proper nighttime operations.

1.3.5. Access Roads

The Project will not construct any access roads. The Project would be accessed directly off of Kaiser Road. Only internal roads would be constructed for the Project.

1.3.6. Water Use (Operations)

During operations of the initial 50 MW capacity,, the electrolyzers will use 2.4 gallons of water to produce 1 kg of green hydrogen. Running the electrolyzers for 20 hours a day would require approximately 0.17 acre-feet (54,632 gallons) per day. The water source for the electrolyzers would be from an onsite well.

During operation and maintenance, water would be required for panel washing. The Project would use approximately 20 gallons of water per MW of solar panels per year; therefore, the Project would use approximately 0.006 acre-feet (2,000 gallons) of water annually for panel washing, performed approximately two times per year. The water discharged from panel washing would be absorbed into the surrounding soil or would evaporate.

Water would also be required for the O&M buildings, which would be used by approximately 10 employees and would contain a restroom. The O&M buildings would use approximately 0.0001 acre-feet (50 gallons) per day or approximately 0.06 acre-feet (18,250 gallons) per year. An associated septic leach field would not be located within 0.25 miles of any drinking water well.

1.3.7. Lighting

Solar and hydrogen production at the Project facility would take place during the day, with additional hydrogen production occurring from 9:00 p.m. to 6:00 a.m. The entrance to the onsite buildings, parking areas, hydrogen facilities, and switchgear yard would have lighting activated by motion detectors. Lighting would be used during operation of the hydrogen electrolyzers at night to ensure safe operations. Nothing in or around the solar arrays would be lit at night unless emergency repairs are necessary. All lighting would be shielded and directed downward to minimize the potential for glare or spillover onto adjacent areas. Pole mounted downlights and sconce style lights on buildings would be used. Portable lighting may be used occasionally and temporarily for maintenance activities during operations, such as emergency work that must occur on panels at night. Additional processes to minimize project lighting include the following:

- Project lighting shall be directed downward and toward the area to be illuminated and shall incorporate fixture hoods/shielding with the appropriate cutoff angles sufficient to prevent lamps and reflectors from being visible beyond the Project boundary, except where necessary for safety and security. Light fixtures shall be of minimum necessary brightness consistent with operational safety and security.
- Areas with security lighting will not be occupied on a continuous basis. Security lights shall have timer switches or motion detectors so that the lights only operate when the area is occupied. The motion sensor technology would trigger the operation of the light if movement at a human's height is detected. Once activity has ceased, the motion sensors would be set to turn off lighting within 10 minutes.
- Portable lighting may be used occasionally during Project construction and temporarily during O&M, such as during emergency work that must occur on panels at night. In such cases, portable lights with reflector housings that can be directionally shielded will be used. Low-mast lighting systems will be used as much as possible. The reflectors will always be directed downward and toward the specific work areas as appropriate to minimize stray light spillover. To accommodate specific short-term tasks, portable lighting that provides higher light levels as well as lights that need to be aimed above the horizontal may be used for short periods. However, in all cases, portable lights will be adjusted to illuminate only the area necessary for night work tasks in specific work locations. The necessity for night work will be determined during O&M and will be employed only if emergency maintenance is required.

1.4. Decommissioning and Repowering

The facility's equipment has a useful life of 30 to 50 years. At that time, the facility would likely be optimized to increase the plant's efficiency by swapping out equipment for more efficient and modern units. Ground disturbing work would not be necessary for optimization activities. The Project would be offline for several weeks or months during optimization activities.

At the end of the Project's useful life, the hydrogen facility and solar arrays would be decommissioned and dismantled. Upon ultimate decommissioning, a majority of Project components will be suitable for recycling or reuse, and Project decommissioning would be designed to optimize such salvage as circumstances allow and in compliance with all local, state, and federal laws and regulations in effect at the time of decommissioning. Following removal of the aboveground and buried Project components as required in the Closure and Decommissioning Plan, the site would be restored to its pre-solar facility conditions, or such condition as appropriate in accordance with applicable policy at the time of decommissioning.

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

- Dismantling and removal of all aboveground equipment (solar panels, track units, transformers, inverters, electrolyzers, O&M buildings, switchyard, distribution lines, etc.)
- Excavation and removal of all aboveground cables

- Removal of solar panel posts
- Removal of primary roads (aggregate-based)
- Break-up and removal of concrete pads and foundations
- Removal of septic system and leach field
- Removal of 34.5 kV collector lines
- Scarification of compacted areas

The panels could be sold into a secondary solar PV panel market. The majority of the components of the solar installation are made of materials that can be readily recycled. If the panels can no longer be used in a solar array, the silicon can be recovered, the aluminum resold, and the glass recycled. Other components of the solar installation, such as the tracker structures and mechanical assemblies, can be recycled, as they are made from galvanized steel. Equipment such as drive controllers, inverters, transformers, and switchgear can be either reused or their components recycled. The equipment pads are made from concrete, which can be crushed and recycled. Underground conduit and wire can be removed by uncovering trenches, removing the conduit and wire, and backfilling. The electrical wiring is made from copper and/or aluminum and can be reused or recycled, as well. It is estimated that 100 percent of copper components will be recycled and approximately 50 percent of aluminum and other components would be recycled.

1.5. Other Permits and Approvals

Various permits and approvals from other agencies may also need to be obtained by Skybridge for the Project Table 4 summarizes the permits from other federal, State, and local agencies that may be needed for the Project.

Table 4. Permits that May Be Required for the Skybridge Eagle Mountain Solar Farm & Green Hydrogen Project

Permit, Approval or Report	Regulatory Authority	Permit Description
State		
Incidental Take Permit under the California Endangered Species Act	California Department of Fish & Wildlife	Applies if the project would potentially affect a species listed under the California Endangered Species Act.
Section 1600 Lake & Streambed Alteration Agreement	California Department of Fish & Wildlife	The applicant is required to notify CDFW prior to constructing a project that would divert, obstruct, or change the natural flow, bed, channel, or bank of a river, stream, or lake.
Hazardous Materials Business Plan (California Health and Safety Code, Division 20, Chapter 6.95)	Riverside, Certified Unified Program Agency, (delegated from Cal EPA)	Identifies all hazardous materials and their location at the facility.
Storm Water Discharge Permit	State Water Quality Control Board	Required for construction site over 5 acres. Authorization to be covered under the NPDES Construction Permit and approval of a Storm Water Pollution Prevention Plan.
Local		
Conditional Use Permit, Grading & Building Permits	Riverside County	Grading and building permits would be needed. The Project would require a Conditional Use Permit and a Development Agreement with the County.
Final Closure and Restoration Plan	Riverside County	Plan to address the closure and site restoration upon termination of the use of the site. This plan is a condition of approval prior to permit issuance.

Permit, Approval or Report	Regulatory Authority	Permit Description
Certificate of Parcel Merger	Riverside County	Certificate of Parcel Merger application to merge parcel lines of all project parcels.
Air Quality Permit	South Coast Air Quality Management District	Management of particulates generated by construction at the site is required. Typically, Best Management Practices are employed and will be documented in the permit application.

A. Type of Project: Site Specific ☒; Countywide ☐; Community ☐; Policy ☐.

B. Total Project Area: Approximately 133 acres

Residential Acres: ____ Lots: ____ Units: ____ Projected No. of Residents: ____

Commercial Acres:____ Lots: ____ Sq.Ft. of Bldg. Area: ____ Est. No. of Employees: ____

Industrial Acres: ____ Lots: ____ Sq.Ft. of Bldg. Area: ____ Est. No. of Employees: ____

Other: 120 acres of solar development, 13 acres of green hydrogen development

C. Assessor's Parcel No(s): 807-660-023, 807-660-024, 807-130-033, 807-130-043, 807-130-045

Street References: North of Kaiser Road and East of Power Line Road, approximately 7.3 miles north of I-10 near Desert Center, California, in the Chuckwalla Valley.

Section, Township & Range Description or reference/attach a Legal Description: Victory Pass 7.5' U.S. Geological Survey topographic quadrangle on Section 16 of Township 4 South, Range 15 East, San Bernardino Base and Meridian

D. Brief description of the existing environmental setting of the project site and its surroundings: The Project site is currently vacant. Anthropogenic features and land use near the Project site include transportation (I-10 to the south), agricultural, renewable energy, energy transmission, historical military operations, and recreational development.

2. Applicable General Plan And Zoning Regulations

General Plan Elements/Policies

Land Use: The Project would be consistent with the following policies related to renewable energy resources and included within the County's General Plan Land Use Element:

LU 17.2. Permit and encourage, in an environmentally and fiscally responsible manner, the development of renewable energy resources and related infrastructure, including but not limited to, the development of solar power plants in the County of Riverside

Consistency Analysis: Consistent. The Project would develop a solar and green hydrogen facility.

LU 26.3. Ensure that development does not adversely impact the open space and rural character of the surrounding area.

LU 26.4. Encourage parcel consolidation.

Consistency Analysis: Consistent. The Project would develop a solar and green hydrogen facility, and it would be consistent with the existing and surrounding land uses, which include an adjacent solar project. The proposed Project would consolidate 5 parcels.

Circulation: The Project would be consistent with the following policies related to the Project and included within the County's General Plan Circulation Element:

C 2.3. Traffic studies prepared for development entitlements (tracts, public use permits, conditional use permits, etc.) shall identify project related traffic impacts and determine the significance of such impacts in compliance with CEQA and the Riverside County Congestion Management Program Requirements.

> ***Consistency Analysis: Consistent.*** According to the County of Riverside's Transportation Analysis Guidelines, December 2020, the Project does not need to prepare a traffic study because the Project is estimated to generate fewer than 100 trips during peak periods. Traffic impacts are discussed in Section 5.18.

C 20.15. Implement National Pollutant Discharge Elimination System Best Management Practices relating to construction of roadways to control runoff contamination from affecting the groundwater supply.

> ***Consistency Analysis: Consistent.*** The Project would conform to the California State Water Resource Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges (General Permit) for activities regarding runoff and erosion control, as well as applicable regional, county, and local requirements.

C 25.2. Locate new and relocated utilities underground when possible and feasible. All remaining utilities shall be located or screened in a manner that minimizes their visibility by the public.

> ***Consistency Analysis: Consistent.*** N/A - The Project would not result in construction of new utilities or relocation of existing utilities. Multipurpose Open Space: The Project would be consistent with the following policies related to renewable energy resources and included within the County's General Plan Multipurpose Open Space Element:

OS 3.3. Minimize pollutant discharge into storm drainage systems, natural drainages, and aquifers.

> ***Consistency Analysis: Consistent.*** The Project would conform to the California State Water Resource Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges (General Permit) for activities regarding runoff into natural drainages, as well as applicable regional, county, and local requirements. The site does not include any aquifers or developed storm drainage systems.

OS 19.3. Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.

> ***Consistency Analysis: Consistent.*** Section 5.5 describes the cultural resources present in the APE.

OS 19.5. Exercise sensitivity and respect for human remains from both prehistoric and historic time periods and comply with all applicable laws concerning such remains.

> ***Consistency Analysis: Consistent.*** Section 5.5 describes the cultural resources present in the APE. The project would comply with rules and regulations concerning discovery of remains.

OS 19.6. Whenever existing information indicates that a site proposed for development has high paleontological sensitivity as shown on Figure OS-8, a paleontological resource impact mitigation program (PRIMP) shall be filed with the County Geologist prior to site grading. The PRIMP shall specify the steps to be taken to mitigate impacts to paleontological resources.

> ***Consistency Analysis: Consistent.*** The Project would comply with this policy. Section 5.14, Paleontological Resources, includes mitigation measure PAL-1, which is the preparation and implementation of a Paleontological Resources Monitoring Plan.

OS 19.9. Whenever paleontological resources are found, the County Geologist shall direct them to a facility within Riverside County for their curation, including the Western Science Center in the City of Hemet.

Consistency Analysis: Consistent. The Project would comply with this policy.

OS 21.2. Identify and conserve the skylines, view corridors, and outstanding scenic vistas within Riverside County.

Consistency Analysis: Consistent. The Project would not be located in a designated scenic vista and would be situated on lands that are adjacent to existing electrical and solar facilities. The Project is not near any County or State Scenic Highways. It is approximately 7.3 miles north from an Eligible County Scenic Highway (I-10), but the Project would be consistent with the adjacent land uses, which include other solar facilities and electrical power lines.

Safety: The Project would be consistent with the following policies related to renewable energy resources and included within the County's General Plan Safety Element:

S 1.1. Mitigate hazard impacts through adoption and strict enforcement of current building codes, which will be amended as necessary when local deficiencies are identified.

Consistency Analysis: Consistent. The Project would conform to the International Building Code and California Building Code.

S 5.1. Enforce land use policies and existing criteria related to hazardous materials and waste through ongoing implementation of the programs identified in the County's Hazardous Waste Management Plan (CHWMP).

Consistency Analysis: Consistent. The Project would develop and implement a Hazardous Material Management Plan that addresses the use, storage, transportation, and disposal of hazardous materials, including spill and emergency response procedures. The Plan would be subject to Riverside County approval prior to implementation.

S 5.4. Ensure that industrial facilities are constructed and operated in accordance with current safety and environmental protection standards.

Consistency Analysis: Consistent. Prior to construction the project would secure a Building Permit from Riverside County. During operations, the project would comply with all applicable federal, state, and local regulations.

S 5.6. Require that any business that handles a hazardous material prepare a plan for emergency response to a release or threatened release of a hazardous material, including providing updated information to emergency responders on the type and quantity of hazardous materials kept on-site.

Consistency Analysis: Consistent. The Project would develop and implement a Hazardous Material Management Plan that addresses the use, storage, transportation, and disposal of hazardous materials, including spill and emergency response procedures. The Plan would be subject to Riverside County approval prior to implementation.

S 5.9. Require commercial businesses, utilities, and industrial facilities that handle hazardous materials to install automatic fire and hazardous materials detection, reporting, and shut-off devices, and install an alternative communication system in the event power is out or telephone service is saturated following an earthquake.

Consistency Analysis: Consistent. The Project will be required to secure a Building Permit with Riverside County. The Building Permit application review and approval process will ensure that the Project incorporates all necessary regulatory safety requirements.

Noise: The Project would be consistent with the following policies related to renewable energy resources and included within the County's General Plan Noise Element:

N 3.3. Ensure compatibility between industrial development and adjacent land uses. To achieve compatibility, industrial development projects may be required to include noise mitigation measures to avoid or minimize project impacts on adjacent uses.

> ***Consistency Analysis: Consistent.*** The Project would be adjacent to an existing solar development and would be approximately 330 feet from the nearest inhabited dwelling. There aren't any moving parts on the electrolyzers themselves. The spec sheets state <72db (A) @ 10ft which is equivalent to what the Hearing Health Foundation says compares to average office noise.

N 7.4. Check each development proposal to determine if it is located within an airport noise impact area as depicted in the applicable Area Plan's Policy Area section regarding Airport Influence Areas. Development proposals within a noise impact area shall comply with applicable airport land use noise compatibility criteria.

> ***Consistency Analysis: Consistent.*** The Project is located approximately 2.5 miles away from the nearest airport, the Eagle Mountain Airport. This airport does not have an airport land use plan.

N 13.1. Minimize the impacts of construction noise on adjacent uses within acceptable practices.

> ***Consistency Analysis: Consistent.*** The Project would be adjacent to an existing solar development and would be approximately 330 feet from the nearest inhabited dwelling. Construction activities would be conducted during the day and in accordance with the County Noise Ordinance.

N 13.2. Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse noise impacts on surrounding areas.

> ***Consistency Analysis: Consistent.*** The applicant proposes to perform construction during the day and in accordance with the Riverside County Noise Ordinance.

Housing: The County's General Plan Housing Element does not contain any policies related to solar or hydrogen projects.

> ***Consistency Analysis:*** While no policies outlined in the Housing Element apply, the Project would not conflict with the County's General Plan Housing policies.

Air Quality: The Project would be consistent with the following policies related to renewable energy resources and included within the County's General Plan Air Quality Element:

AQ 4.9. Require compliance with SCAQMD Rules 403 and 403.1, and support appropriate future measures to reduce fugitive dust emanating from construction sites.

> ***Consistency Analysis: Consistent.*** The Project would comply with rule 403 and 403.1, including implementation of dust abatement practices.

AQ 20.19. Facilitate development and siting of renewable energy facilities and transmission lines in appropriate locations.

> ***Consistency Analysis: Consistent.*** The Project would be situated adjacent to existing solar developments and the Project site is directly adjacent to an existing utility corridor (SCE). The nearest residence is approximately 330 feet away from the Project boundary.

AQ 26.1. The County shall implement programs and requirements to achieve the following objectives related to reducing greenhouse gas emissions derived from energy generation:

a. Encourage the installation of solar panels and other energy-efficient improvements.

b. Facilitate residential and commercial renewable energy facilities (solar array installations, individual wind energy generators, etc.).

c. Facilitate development of renewable energy facilities and transmission lines in appropri- ate locations.

d. Facilitate renewable energy facilities and transmission line siting.

e. Provide incentives for development of local green technology businesses and locally produced green products.

f. Provide incentives for investment in residential and commercial energy efficiency improvements.

g. Identify lands suitable for wind power generation or geothermal production and encourage development of these alternative energy sources.

Consistency Analysis: Consistent. The Project would install a solar facility which would power a green hydrogen facility. The produced green hydrogen would be used to fuel hydrogen vehicles which emit no emissions. Both the use of hydrogen as a fuel, and energy produced by solar technology would contribute to a reduction of GHG's derived from energy generation.

Healthy Communities: The County's General Plan Healthy Communities Element does not contain any policies related to renewable energy resources or the Project.

Consistency Analysis: While no policies outlined in the Healthy Communities Element apply, the Project would not conflict with the County's General Plan Health Community policies.

Environmental Justice (After Element is Adopted): Not applicable.

Desert Center Area Plan: The Project would be consistent with the following policies related to renewable energy resources and included within the County's Desert Center Area Plan:

DCAP 4.1. When outdoor lighting is used, require the use of fixtures that would minimize effects on the nighttime sky and wildlife habitat areas, except as necessary for security reasons.

Consistency Analysis: Consistent. The Project would use outdoor lighting only in the manned portions of the project and for security reasons. The lighting would be shielded, downward facing and no light would be emitted outside of the Project site boundaries.

DCAP 8.2. Support the designation of Interstate 10 as an eligible, and subsequently, official, scenic highway in accordance with the California State Scenic Highway Program.

Consistency Analysis: Consistent. The Project would be 7.3 miles north from Interstate 10. The Project is consistent with the current visual setting of the area.

DCAP 9.1. Encourage clustering of development for the preservation of contiguous open space.

Consistency Analysis: Consistent. The Project would be adjacent to an existing solar development and adjacent to existing utility corridors (SCE and SoCal Gas).

General Plan Area Plan(s): Desert Center Area Plan Foundation Component(s): Open Space-Rural

Land Use Designation(s): Open Space Rural (OS-RUR) Overlay(s), if any: None

Policy Area(s), if any: None Adjacent and Surrounding:

1. General Plan Area Plan(s): Desert Center Area Plan
2. Foundation Component(s): Community Development foundation component (Eagle Mountain Landfill), Open Space-Rural
3. Land Use Designation(s): Open Space-Rural (OS-RUR), Open Space-Recreation, Public Facilities
4. Overlay(s), if any: none.
5. Policy Area(s), if any: Eagle Mountain Policy Area, and Eagle Mountain Landfill and Townsite Specific Plans, numbers 305 and 306 (approximately 2 miles northwest of the Project site)

Adopted Specific Plan Information

1. Name and Number of Specific Plan, if any: None
2. Specific Plan Planning Area, and Policies, if any: None

Existing Zoning: Controlled Development Areas (W-2-10) Proposed Zoning, if any: W-2-10 (no change from existing)

Adjacent and Surrounding Zoning: W-2-10, no zoning for adjacent federal lands

3. Environmental Factors Potentially Affected

The environmental factors checked below (x) would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐ Aesthetics	☒ Hazards & Hazardous Materials	☐ Recreation
☐ Agriculture & Forest Resources	☐ Hydrology / Water Quality	☒ Transportation
☐ Air Quality	☐ Land Use / Planning	☒ Tribal Cultural Resources
☒ Biological Resources	☐ Mineral Resources	☒ Utilities / Service Systems
☒ Cultural Resources	☐ Noise	☒ Wildfire
☐ Energy	☒ Paleontological Resources	☒ Mandatory Findings of Significance
☐ Geology / Soils	☐ Population / Housing	
☐ Greenhouse Gas Emissions	☒ Public Services	

4. Determination

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED
☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made or agreed to by the project proponent**. A MITIGATED NEGATIVE DECLARATION** will be prepared.
☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED
☐ I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
☐ I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED
☐ I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.
☐ I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

	01/15/26
Signature	Date
	For: John Earle Hildebrand III
Tim Wheeler, Principal Planner	*Planning Director*

5. Environmental Issues Assessment

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000-21178.1), this Initial Study has been prepared to analyze the proposed project to determine any potential significant impacts upon the environment that would result from construction and implementation of the project. In accordance with California Code of Regulations, Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the County of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the proposed project. The purpose of this Initial Study is to inform the decision-makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed project.

5.1. Aesthetics

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Scenic Resources				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☒	☐	☐

Source(s): Riverside County General Plan Figure C-8, "Scenic Highways" (Riverside County, 2020)

Findings of Fact:

a) *Construction, Operations and Maintenance (O&M), and Decommissioning*. The Project is located 7.3 miles north of Interstate 10, a Riverside County eligible scenic highway and the closest scenic corridor to the Project site. Therefore, neither Project construction, O&M, or decommissioning activities would have an impact on a scenic highway corridor.

b) *Construction, O&M, and Decommissioning*. The Project would not substantially damage any scenic resources, obstruct any scenic vistas, or result in the creation of an aesthetically offensive site. The Project would be on a vacant desert site, with no existing scenic resources. The Project would be located in close proximity of an existing solar development, Desert Sunlight. Therefore, there would be no impact as a result of Project construction, O&M, or decommissioning activities.

c) *Construction, O&M, and Decommissioning*. The Project is approximately 3 miles east of the Joshua Tree National Park (JTNP). The eastern part of the park is noted for its dark skies and attracts stargazers and amateur astronomers. The Project would be visible from this resource; however, the Project site is approximately 133 acres and would not cause a significant visual change in the region, given the approximately 30,000 acres of existing, under construction, and future solar developments in the Desert Center region (see Figure 4). Due to the Project's proximity to the Joshua Tree National Park and to minimize light pollution, the Project will adhere to lighting specifications as described in Section 1.3.7. The implementation of the following specifications would minimize the amount of lighting potentially visible to viewers of the Project site at night.

- Project lighting shall be directed downward and toward the area to be illuminated and shall incorporate fixture hoods/shielding with the appropriate cutoff angles sufficient to prevent lamps and reflectors from being visible beyond the Project boundary, except where necessary for safety and security. Light fixtures shall be of minimum necessary brightness consistent with operational safety and security.
- Areas with security lighting will not be occupied on a continuous basis. Security lights shall have timer switches or motion detectors so that the lights only operate when the area is occupied. The motion

sensor technology would trigger the operation of the light if movement at a human's height is detected. Once activity has ceased, the motion sensors would be set to turn off lighting within 10 minutes.

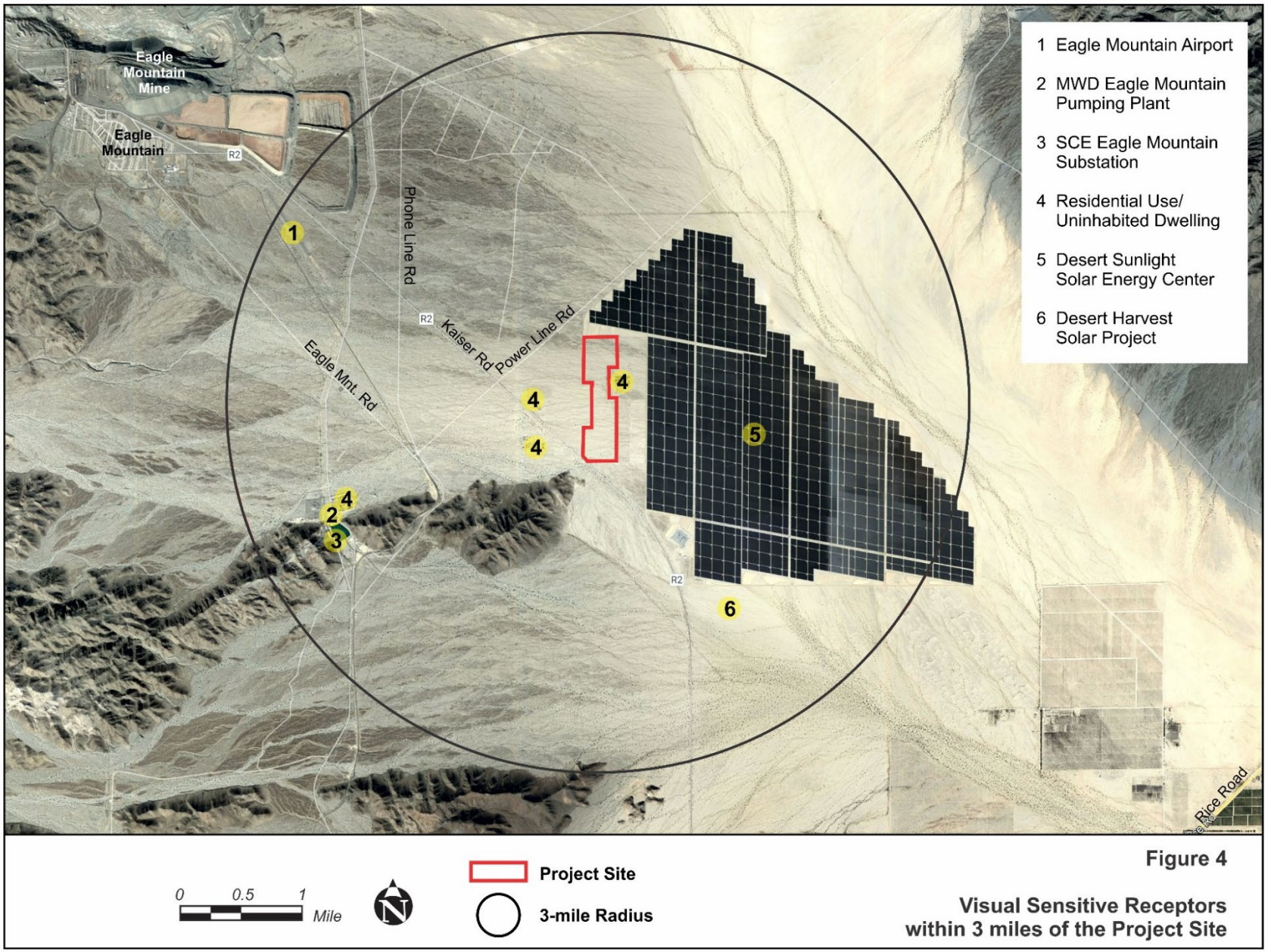
- Portable lighting may be used occasionally during Project construction and temporarily during O&M, such as during emergency work that must occur on panels at night. In such cases, portable lights with reflector housings that can be directionally shielded will be used. Low-mast lighting systems will be used as much as possible. The reflectors will always be directed downward and toward the specific work areas as appropriate to minimize stray light spillover. To accommodate specific short-term tasks, portable lighting that provides higher light levels as well as lights that need to be aimed above the horizontal may be used for short periods. However, in all cases, portable lights will be adjusted to illuminate only the area necessary for night work tasks in specific work locations. The necessity for night work will be determined during O&M and will be employed only if emergency maintenance is required.

With implementation of the proposed lighting specifications and proximity of the Project to extensive development within the immediate region (see Figure 4), the Project's contribution to regional night sky light pollution during construction, O&M and decommissioning is insignificant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Figure 4. Visual Sensitive Receptors within 3 Miles of the Project Site



Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
2. Mt. Palomar Observatory				
a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?	☐	☐	☐	☒

Source(s): GIS database, Ord. No. 655 (Regulating Light Pollution) (Riverside County, 1988)

Findings of Fact: *Construction, O&M, and Decommissioning*. The Project is approximately 90 miles from the Mt. Palomar Observatory, and the Project has designed the lighting to prevent light pollution. Therefore, there would be no impacts as a result of Project construction, O&M, or decommissioning activities.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3. Other Lighting Issues				
a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
b) Expose residential property to unacceptable light levels?	☐	☐	☒	☐

Source(s): GIS database, Project Application Description

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. The Project would be located in an area with few existing structures, where the use of uncontrolled or excessive lighting may be noticeable to nearby motorists on Kaiser Road and potentially recreationists at the JTNP and regional wilderness areas which are located a minimum distance of 3 miles from the Project site. The site would not be visible to residents of the nearby communities of Desert Center (7.3 miles away) or the Lake Tamarisk Desert Resort (intervening solar facility – Desert Sunlight). Operation of the Project would require on-site nighttime lighting for safety and Security.

In order to reduce off-site lighting impacts, the specifications in Section 1.4.7, Lighting, would be followed. These specifications would restrict the lighting at the facility. The entrance to the onsite buildings, parking areas, hydrogen facilities, and switchgear yard would have lighting activated by motion detectors. Lighting would be used during operation of the hydrogen electrolyzers at night to ensure safe operations. Nothing in or around the solar arrays would be lit at night unless emergency repairs are necessary. All lighting would be shielded and directed downward to minimize the potential for glare or spillover onto adjacent areas. Pole mounted downlights and sconce style lights on buildings would be used. Portable lighting may be used occasionally and temporarily for maintenance activities during operations, such as emergency work that must occur on panels at night. Also, see Section 1c above.

Additionally, the Project consists of 133 acres, which is miniscule compared to the existing and planned solar projects in eastern Riverside County, which occupy approximately 30,000 acres. Figure 4 shows the

Project location and the numerous other solar projects in the area. With implementation of lighting restrictions, visual impacts to public views would be less than significant as a result of Project construction, O&M, or decommissioning activities.

b) *Construction, O&M, and Decommissioning*. The closest visually sensitive receptor would be a residence approximately 330 feet from the Project site (see Figure 5). The lighting used would be shielded and directed downwards to prevent spillover to adjacent properties. The Project would only light certain areas of the Project to ensure safe operations, such as the entrance to the onsite buildings, parking areas, hydrogen facilities, and switchgear yard. These areas would have lighting activated by motion detectors to reduce the time that lighting is on. Portable lighting may be used occasionally and temporarily for maintenance of the facilities. Therefore, impacts as a result of Project construction, O&M, or decommissioning activities would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.2. Agriculture & Forest Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Agriculture				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?	☐	☐	☐	☒
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?	☐	☐	☐	☒
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Source(s): Desert Center Area Plan (Riverside County, 2021a), Riverside County Desert Center Area Plan Figure 3 "Desert Center Area Plan Land Use Plan," (Riverside County, 2021b), GIS database, Project application materials.

Findings of Fact:

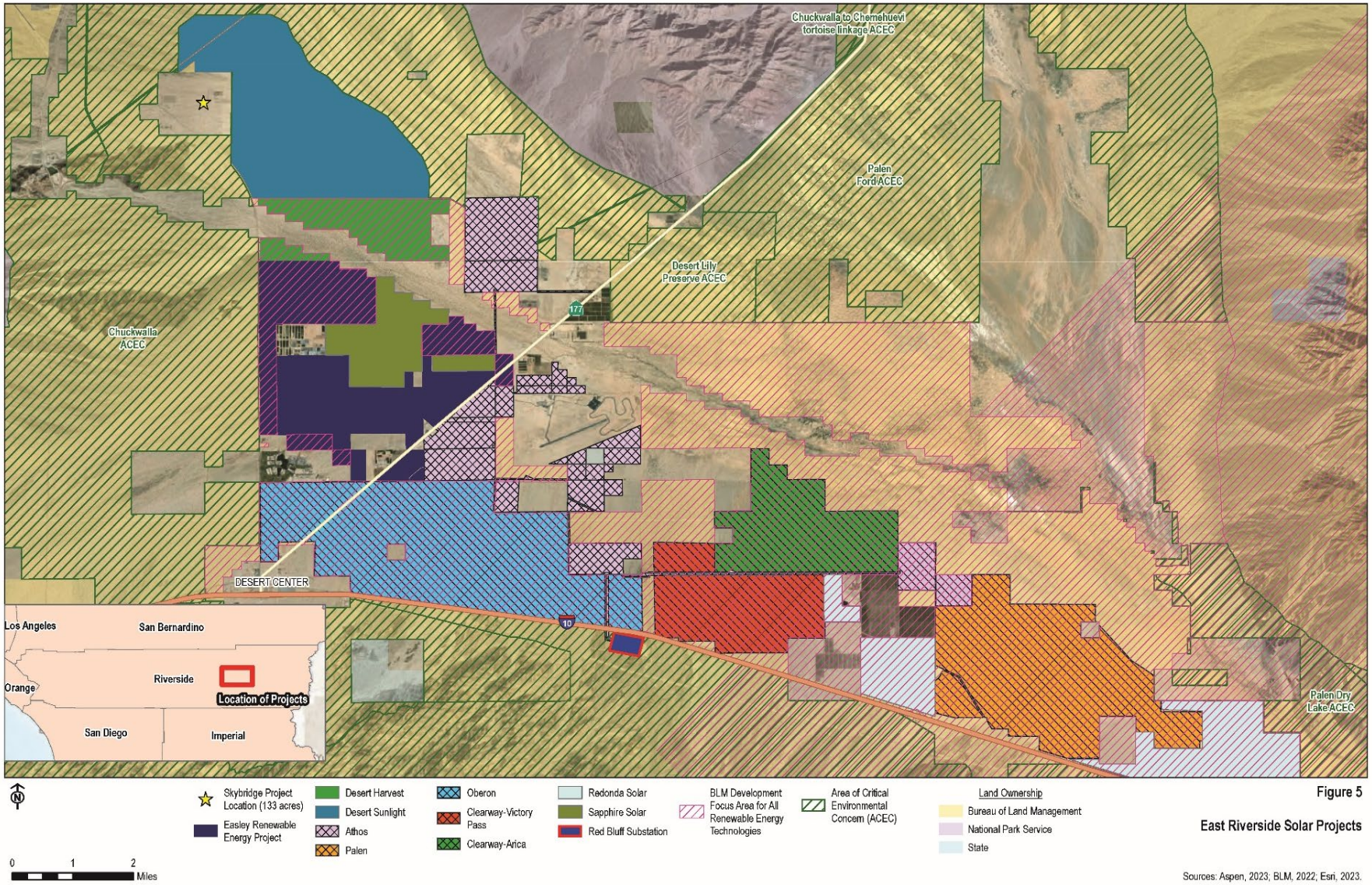
a-d). *Construction, O&M, and Decommissioning*. The Project site is currently vacant and is designated as Open Space-Rural (OS-RUR) in the Riverside County General Plan (Riverside County 2015). The Project site has an existing zoning classification of Controlled Development Areas (W-2-10). The Project site is not located on or adjacent to any lands identified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, as defined by the U.S. Department of Agriculture. This area is also not recognized by the Riverside County General Plan as an area of Important Farmland. The Project site is not under a Williamson Act contract. The Project site would be converted from vacant land to a commercial solar and green hydrogen production development. There is an active jojoba farm approximately 300 feet to the east of the Project, but this farm is on land zoned as Controlled Development Areas (W-2-10). The project

is not within 300 feet of any agriculturally zoned property, and the operations on this site would not impact any agricultural operations or resources. Construction and decommissioning would be temporary and would have no impact. Therefore, no impacts to agricultural resources as a result of Project construction, O&M, or decommissioning activities would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Figure 5. East Riverside Solar Projects



Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
5. Forest				
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?	☐	☐	☐	☒
b) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	☐	☐	☐	☒

Source(s): Riverside County General Plan Figure OS-3b, "Forestry Resources Eastern Riverside County Parks, Forests, and Recreation Areas," (Riverside County 2015), Project Application Materials

Findings of Fact:

a-c) *Construction, O&M, and Decommissioning*. The Project site is currently vacant and is zoned as a Controlled Development Area (W-2-10) under the Riverside County Zoning and designated as Open Space-Rural (OS-RUR) in the Riverside County General Plan. The Project site is not located on or adjacent to any lands identified as forestland or timberland. The construction, operation, and decommissioning of the Project would not impact forestland or the ability of distant timberland businesses to operate. Therefore, no impacts to forestland or timberland resources as a result of Project construction, O&M, or decommissioning activities would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.3. Air Quality

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
6. Air Quality Impacts				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP") (Riverside County 2019), SCAQMD CEQA Air Quality Handbook (SCAQMD 2019), Appendix A: AQ, GHG, and Water Usage Impacts Letter Report (Yorke 2022)

Findings of Facts. *Construction, O&M, and Decommissioning*. The Project is located within the Mojave Desert Air Basin (MDAB) and is within the Jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD Air Quality Management Plan was adopted in December 2022 to address the requirements to meet the 2015 ozone NAAQS, of which the South Coast Air Basin is in "extreme" nonattainment. The AQMP uses projections of population growth and trends in energy and transportation demand to predict future emissions and determine control strategies to achieve attainment with the ambient air quality standards. This includes control measures targeting different stationary and mobile source categories. The control strategies are then either codified into the SCAQMD's rules and regulations, or otherwise set forth as formal recommendations to other agencies, such as those contained in the SCAQMD CEQA Guidelines. Rule 219, Rule 402, and Rule 403 were established to protect the air quality and are relevant to the Project.

- SCAQMD Rule 219 subjects equipment such as generators, compressors, pumps and concrete batch plants to permit requirements.
- SCAQMD Rule 402 (Nuisance) requires dust suppression techniques to prevent particles from becoming a nuisance off site.
- SCAQMD Rule 403 (Fugitive Dust) prohibits creation of dust plumes that are visible beyond the property line of the emission source. Rule 403 requires all active operations to implement applicable best available control measures. If the project is considered a "large operation", which is one that contains 50 or more acres of disturbed surface area, enhanced dust control requirements may apply.

The Riverside County General Plan's Air Quality Element was adopted in 2015 and revised in 2018. The air quality element includes policies supporting regional cooperation with other jurisdictions to improve air quality; requiring compliance with federal, State and regional air quality regulations; encouraging programs to reduce vehicle miles traveled; encouraging energy conservation in urban land uses; and encouraging development patterns that improve the County's jobs/housing balance. One of the relevant policies to the proposed project in the Air Quality Element is Policy AQ 20.19. This policy facilitates development and siting of renewable energy facilities and transmission lines in appropriate locations (Riverside County 2018).

The Project would be required to adhere to all relevant SCAQMD rules. Additionally, the Project is in line with the Riverside County General Plan's Air Quality Element policy 20.19 as it is a renewable energy facility. Based on these considerations, the Project would not conflict with or obstruct implementation of the Air Quality Plan, and impacts would be less than significant.

b). *Construction and Decommissioning*. The Project is located in an area that is State and federally designated as non-attainment for ozone and PM10. Construction-phase emissions would be intermittent and variable due to the phased activities of construction. Substantial or adverse levels of localized ground-level concentrations of criteria pollutants and toxic air contaminants would not be likely to occur with construction because the pollutants would be emitted from several pieces of equipment dispersed over the Project site. Dust control and engine exhaust would be subject to rules and regulations by the SCAQMD.

Construction Best Management Practices (BMPs) included in calculations of project emissions include:

- Compliant architectural coatings will be used in accordance with SCAQMD rules that limit VOC contents;
- During construction, any exposed soil and unpaved roads will be watered a minimum of twice per day, as BMP for fugitive dust control required by the SCAQMD;
- Vehicle speeds on unpaved roads will be limited 15 miles per hour; and
- Paved roads that access the project site will be swept at least once per month (Appendix A).

Table 5 summarizes the overall construction emissions, and Table 6 shows overall operational emissions for both electrolyzer operations at 50 MW and 500 MW. Emissions during decommissioning are expected to be similar to construction. Neither construction nor operation emissions are estimated to exceed the thresholds set by the SCAQMD. Impacts would be less than significant.

Table 5. Construction Emissions – SCAQMD Thresholds (lbs/day)

	VOc	NOx	Co	SOx	PM10	PM2.5
Unmitigated Emissions	7.2	39.8	36.5	0.06	33.4	8.0
SCAQMD Threshold	75	100	550	150	150	55
Exceedance?	N	N	N	N	N	N

Source: Appendix A: AQ, GHG, and Water Usage Impacts Letter Report (Yorke 2022), and SCAQMD 2009.

Table 6. Operational Emissions – SCAQMD Thresholds (lbs/day)

	VOc	NOx	Co	SOx	PM10	PM2.5
50 MW Electrolyzers: Unmitigated Emissions	1.3	1.7	11.5	0.03	0.95	0.19
500 MW Electrolyzers: Unmitigated Emissions	13.0	17.0	115	3.0	9.5	1.9
SCAQMD Threshold	55	55	550	150	150	55
Exceedance?	N	N	N	N	N	N

Source: Appendix A: AQ, GHG, and Water Usage Impacts Letter Report (Yorke 2022), and SCAQMD 2009.

Since the project in non-attainment for ozone and PM10, there are federal General Conformity de minimis thresholds that apply. These levels and the corresponding construction emissions are shown in Table 7.

Table 7. Construction Emissions – General Conformity (tons/year)

	VOc	NOx	PM10
Construction Emissions	1.3	7.3	6.1
De Minimis Threshold	25	25	70
Exceedance?	N	N	N

Source: Appendix A: AQ, GHG, and Water Usage Impacts Letter Report (Yorke 2022), and USEPA 2022.

Construction emissions would not exceed the Federal General Conformity de minimis levels. Therefore, Project construction would not result in a cumulatively considerable net increase in any criteria pollutant, and this impact would be less than significant.

c) *Construction, O&M, and Decommissioning*. Coccidioidomycosis, often referred to as San Joaquin Valley Fever or Valley Fever, is a fungal infection that varies with the season and most commonly affects people who live in hot dry areas with alkaline soil. This disease affects both humans and animals and is caused by inhalation of arthroconidia (spores) of the fungus *Coccidioides immitis* (CI). CI spores are found in the top few inches of soil, and the existence of the fungus in most soil areas is temporary. The cocci fungus lives as an organism, especially a fungus or bacterium, which grows on and derives its nourishment from dead or decaying organic matter, in dry, alkaline soil. When weather and moisture conditions are favorable, the fungus "blooms" and forms many tiny spores that lie dormant in the soil until they are stirred up by wind, vehicles, excavation, or other ground-disturbing activities and become airborne. Agricultural workers, construction workers, and other people who are outdoors and are exposed to wind, dust, and disturbed topsoil are at an elevated risk of contracting Valley Fever (California Department of Public Health, 2020).

Most people exposed to the CI spores will not develop the disease. Of 100 persons who are infected, approximately 40 will exhibit some symptoms and 2 to 4 will have the more serious disseminated forms of the disease. African Americans, Asians, women in the third trimester of pregnancy, and persons whose immunity is compromised are most likely to develop the most severe form of the disease (California Department of Public Health, 2020).

The Skybridge Project is located in Riverside County, which is an area of the State where relatively high numbers of cases of Valley Fever are reported. Data from 2012 to 2020 show that the average Riverside County incidence rate of the infection during these years was about 5.9 per 100,000, with the most recent data in 2020 having a 12.7 incident rate (California Department of Public Health, 2020).

Sensitive Receptors

The SCAQMD recommends using Localized Significance Thresholds (LSTs) for determining impacts to nearby sensitive receptors. These thresholds are defined for NOx, CO, PM10 and PM2.5 for 1, 2 and 5-acre sites. The Project is located on 133 acres, though site preparation and grading activities would not exceed 5 acres/day (Appendix A). Table 8 shows the calculation of acres graded per day as recommended by the SCAQMD LST Methodology (SCAQMD, 2006). The total maximum graded acres per day by all construction equipment is estimated to be 4 acres/day, so the 5-acre site thresholds were used. The closest sensitive receptor to the Project site would be a residence 330 feet (100 meters) away located approximately 350 meters east of the existing solar array, northeast of Kaiser Rd. See Figure 5 for a map with the nearest sensitive receptors. The 5-acre screening lookup table at a receptor distance of 100 meters for Source Receptor Area (SRA), Zone 31-East Riverside County was used.

Table 8. Acres Graded per Day

	Crawler Tractor	Graders	Rubber Tired Dozer	Scrapers
Acres graded/day/unit	0.5	0.5	0.5	1
Maximum Daily Equipment	2	1	1	2
Maximum acres graded/day	1	0.5	0.5	2

Source: Appendix A: AQ, GHG, and Water Usage Impacts Letter Report (Yorke 2022), SCAQMD, 2006.

Table 9. SCAQMD Localized Significance Threshold – Construction Emissions (lbs/day)

	NOx	CO	PM10	PM2.5
Construction Emissions	39.8	36.5	33.4	8.0
SCAQMD LST	425	5,331	67	19
Exceedance?	N	N	N	N

Source: Appendix A: AQ, GHG, and Water Usage Impacts Letter Report (Yorke 2022), SCAQMD, 2009.

Table 10. SCAQMD Localized Significance Threshold – Operational Emissions (lbs/day)

	NOx	CO	PM10	PM2.5
Operational Emissions	1.7	11.5	0.95	0.19
SCAQMD LST	425	5,331	16	5
Exceedance?	N	N	N	N

Source: Appendix A: AQ, GHG, and Water Usage Impacts Letter Report (Yorke 2022), SCAQMD, 2009.

No construction or operational emissions exceed the LST, therefore, there would be no potential to expose sensitive receptors to substantial pollutant concentrations. Decommissioning impacts would be similar to construction impacts; therefore, this impact would be less than significant.

d) *Construction, O&M, and Decommissioning*. Construction, decommissioning, and operation of the site, including the use of the electrolyzers, would not create other emissions or odors that would adversely affect a substantial number of people. During operations, the electrolyzers would convert water, which is odorless, into hydrogen and oxygen which are also odorless. As noted previously, the electrolyzers would be powered by onsite solar generation or imported electricity, which are also odorless processes. The closest residential use to the project is 330 feet away. The Project site is also relatively remote, and there are not a substantial number of people near the project. Therefore, construction, decommissioning, and operation activities would have a less than significant impact.

Mitigation: No mitigation is required with implementation of SCAQMD regulatory requirements.

Monitoring: No monitoring is required.

5.4. Biological Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
7. Wildlife & Vegetation				
a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	☐	☐	☐	☒
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	☐	☒	☐	☐
c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	☐	☒	☐	☐
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Source(s): BRTR (Appendix B) and references therein; California Natural Diversity Data Base (CNDDB); California Native Plant Society (CNPS) On-line Electronic Inventory.

Findings of Fact:

This section of the EA/IS describes biological resources at the Project site and evaluates the Project's potential impacts to biological resources, including jurisdictional waters. With implementation of Mitigation Measures (below), none of the Project's potential impacts to biological resources would be significant.

The analysis is based on a Biological Resources Technical Report (BRTR) and Aquatic Resources Delineation Report, prepared by Ironwood Consulting (Ironwood, 2025a, 2025b) (see Appendices B and C, respectively).

The BRTR includes a literature review of special-status biological resources reported by the CNDDB, USFWS, and CNPS, and a description of plant and wildlife surveys performed for the Project. Wildlife surveys were conducted in May 2021 (2021 spring surveys) and November 2022 (2022 fall surveys). Because of continued drought conditions in 2021, which limited the germination of forbs, focused special status plant surveys were not conducted in spring 2021 or 2022. However, incidental observations of rare plant occurrences and/or suitable habitat were noted during the 2021 spring and 2022 fall surveys. The spring 2021 and fall 2022 wildlife surveys conformed to full coverage desert tortoise protocol surveys on the Project site.

The Aquatic Resource Delineation Report Includes a description of detailed field investigations of resources potentially subject to State and federal jurisdiction. Prior to conducting delineation fieldwork, preliminary investigations consisted of identifying land surface features within the Project Site. Areas with potential aquatic resource landform features were identified for follow-up detailed field investigations. Surveys were conducted between March 28 and November 17, 2022. Field investigations focused on delineating the lateral extents of waters potentially subject to jurisdiction. Surveyors evaluated all linear water features for OHWM indicators associated with primary low flow channels and/or floodplains.

Please see Appendix B and C for detailed information on Biological and Aquatic Resources.

a) Conservation Plans. Construction, O&M, and Decommissioning. This Project site is not located within an area covered by any other adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan. No impacts would occur.

b) Threatened and Endangered (T&E) Species.

Laws and Regulations

- The Endangered Species Act (ESA) (16 U.S.C. 1531 et seq.) establishes legal requirements for the conservation of endangered and threatened species and the ecosystems upon which they depend.
  - **Section 9.** Section 9 of the ESA lists those actions that are prohibited under the ESA, including take (i.e., to harass, harm, pursue, hunt, wound, or kill) of listed species without special exemption. "Harm" is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or shelter. "Harass" is further defined as actions that create the likelihood of injury to listed species to an extent as to significantly disrupt normal behavior patterns which include breeding, feeding, and shelter.
  - **Section 10.** Section 10 allows for the "incidental take" of endangered and threatened species by non- federal entities. Incidental take is defined by the ESA as take that is "incidental to, and not the purpose of, the carrying out of an otherwise lawful activity." Section 10 requires an applicant for an incidental take permit to submit a Habitat Conservation Plan that specifies, among other things, the impacts that are likely to result from the taking and the measures the applicant will undertake to minimize and mitigate such impacts.

- **Critical Habitat.** Designation of an area as critical habitat provides a means by which the habitat of an endangered or threatened species can be protected from adverse changes or destruction resulting from federal activities or projects. A critical habitat designation does not set up a reserve or refuge and usually applies only when federal funding, permits, or projects are involved. The Project site is not located within designated critical habitat for any species.

- **California Endangered Species Act.** The California Endangered Species Act (CESA) (Fish and Game Code 2050 et seq.) establishes the policy of the state to conserve, protect, restore, and enhance threatened or endangered species and their habitats. CESA mandates that state agencies not-approve projects that would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy.

  Title 14 of the California Code of Regulations (Sections 670.1) and Fish and Game Code Sections 2050 outline the criteria and process for listing a species as candidate, threatened, or endangered. As a candidate for listing, the species is temporarily afforded the same protections as a state-listed endangered or threatened species.

- **Fully Protected Designations – California Fish and Game Code Sections 3511, 4700, 5515, and 5050.** Prior to enactment of CESA and the federal ESA, California enacted laws to "fully protect" designated wildlife species from take, including hunting, harvesting, and other activities. Unlike the subsequent CESA and ESA, there was no provision for authorized take of designated fully protected species. Currently, 36 fish and wildlife species are designated as fully protected in California, including golden eagle and desert bighorn sheep. California Senate Bill 618 (signed by Governor Brown in October 2011) authorizes take of fully protected species, where pursuant to a Natural Conservation Community Plan, approved by CDFW. The legislation gives fully protected species the same level of protection as is provided under the Natural Community Conservation Planning Act for endangered and threatened species.

- **Bald and Golden Eagle Protection Act.** The Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. 668, enacted by 54 Stat. 250) protects bald and golden eagles by prohibiting the taking, possession, and commerce of such birds and establishes civil penalties for violation of this act. Under BGEPA, take includes "disturb," which means "to agitate or bother a bald eagle or a golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior."

The Project may adversely affect several listed threatened or endangered plant and wildlife species that have a moderate to high potential to occur within the Project site. If present on the Project site, the Project would have potential to cause disturbance to one or more of these species. With implementation of BIO Mitigation Measures, impacts to listed threatened and endangered species would be less than significant.

Species determined to have a low probability of occurrence due to the absence of suitable habitat are presented in the BRTR, Appendix B.

T&E Plants

No listed threatened or endangered species were detected or have potential to occur in the Project site.

T&E Wildlife

Reptiles

Mojave Desert tortoise (FT, ST).[2] The Mohave Desert tortoise *(Gopherus agassizii)* is listed as threatened under CESA, and the Mojave population *(i.e., west of the Colorado River)* is listed as threatened under the federal ESA. East of the Colorado River, the desert tortoise's range extends into the Arizona deserts, and south through Sonora *(Mexico)*. The listed Mojave population is now recognized as a distinct species *(Gopherus agassizii)* from the Sonoran desert tortoise *(G. morafkai)*. All wild desert tortoises in California are part of the state and federally listed Mojave population.

Predicted desert tortoise occupancy values of 0.3 or above are appropriate for identifying suitable habitat in this low desert region. Portions of the Project site are modeled as potential desert tortoise habitat (BRTR, Appendix B). In general, habitat that is modeled as having a 0.5 or higher probability of desert tortoise occupancy is considered habitat. The Project site is modeled at 0.4 to 0.5 in the northern part of the Project site and 0.5 to 0.6 in the southern part of the Project site, indicating that there is moderate potential for desert tortoise to be present. The Project site; however, is near an active solar farm, rural residences, and an active jojoba farm, so it is unlikely that desert tortoises occupy the Project site.

During the 2021 spring surveys, no live individuals were observed, but one inactive Class 4 burrow (possibly desert tortoise, good condition) and one inactive Class 5 (possibly desert tortoise, deteriorated) burrow was observed on the Project site. Another inactive Class 4 burrow was observed in the buffer of the Project site.

The Project site is not within USFWS designated critical habitat for the desert tortoise (USFWS, 1994). Desert tortoise Critical Habitat is located within approximately 1 mile west across Kaiser Road.

Summary of Impacts to threatened and endangered reptiles

Construction, O&M, and Decommissioning

The project would permanently impact approximately 133 acres of suitable and potentially occupied desert tortoise habitat (Creosote-white bursage (Larrea tridentata-Ambrosia dumosa) and Blue palo verde-ironwood (Parkinsonia florida-Olneya tesota)). No temporary impacts would occur.

Without minimization or avoidance measures, the Project could cause disturbance, injury, or mortality to desert tortoises during construction, O&M, or decommissioning activities. If the site is a part of a desert tortoise's home range, land use conversion could reduce local habitat availability, possibly reducing access to food, water, or other resources, and impact population density. If a desert tortoise is found on the project site during construction or O&M, it would be vulnerable to impacts such as mortality or injury due to crushing by site preparation equipment or vehicle collision, or increased predation by opportunistic predators such as common ravens that may be attracted to the project site.

[2] Federal
FE – Federally listed endangered: species in danger of extinction throughout a significant portion of its range
FT – Federally listed, threatened: species likely to become endangered within the foreseeable future
FCT – Candidate species proposed for federal listing as a threatened species
BCC – Fish and Wildlife Service: Birds of Conservation Concern
State
SSC – State Species of Special Concern
CFP – California Fully Protected
SE – State listed as endangered
ST – State listed as threatened
WL – State watch list
CPF – California Protected Furbearing Mammal
CPGS – California Protected Game Species

Desert tortoises, their eggs, or other reptiles could be harmed during clearing or grading activities, or could become entrapped within open trenches and pipes. The Project could also cause mortality or injury to tortoises, their eggs, or other reptiles from vehicle strikes. Other effects could include individual tortoises or eggs being crushed or entombed in their burrows, disruption of tortoise behavior during construction or operation of facilities, and disturbance by noise or vibrations from heavy equipment. Desert tortoises or other reptiles may be attracted to the construction area by shade beneath vehicles, equipment, or materials, or the application of water to control dust, placing them at higher risk of injury or mortality.

Without minimization and avoidance measures the Project construction and operation could create "subsidies" such as food, water, or nest sites, for common ravens or other predators. Ravens prey on juvenile desert tortoises, contributing to the overall decline in tortoise recruitment. Other effects could include the introduction and spread of invasive weeds in suitable habitat and increased human presence, noise, and night lighting. Noise and lighting during construction could affect threatened and endangered reptiles in adjacent habitats by disrupting foraging, breeding, sheltering, and other activities; or may cause individuals to avoid otherwise suitable habitat surrounding the site. Various other human activities (e.g., vehicle traffic, accumulated waste, or nuisance water sources) can be injurious to birds, either as direct hazards (vehicle strikes) or as attractants such as food or water that may put wildlife in harm's way.

Future expansion of green hydrogen from 50 MW to 500 MW would not require additional construction or facilities beyond those proposed, and no additional impacts would occur.

The Project would avoid or minimize impacts to desert tortoise, as described above, by implementing the following Mitigation Measures (see below for complete Mitigation Measure language). Design measures including vegetation management, invasives management, and minimization of night lighting (Section 1.3) would further protect desert tortoise from disturbance and habitat degradation.

- **MM BIO-1:** Biological Monitoring. Requires on-site monitors during work where tortoises could occur, to ensure activities are halted or relocated to avoid tortoises, and to ensure worker compliance with avoidance areas and related requirements.
- **MM BIO-2**: Worker Environmental Awareness Program (WEAP) Training. Requires worker education to ensure familiarity with various protection measures for desert tortoises and other resources.
- **MM BIO-3**: Minimization of Vegetation and Habitat Impacts. Requires flagging to delimit approved work areas and prohibits ground disturbance outside specified areas. Specifies low-impact site preparation wherever facilities do not require permanent vegetation removal.
- **MM BIO-4:** Integrated Weed Management Plan. Requires actions to prevent introductions of weed seeds onto the site, and management measures to control invasive weeds, to prevent habitat degradation.
- **MM BIO-5:** Wildlife Protection. Specifies multiple requirements to prevent harm to wildlife such as vehicle speed limits, pre-construction surveys in work areas, and various requirements to prevent attracting wildlife to work areas (e.g., managing water sources and trash) to prevent inadvertent harm to wildlife.
- **MM BIO-6:** Desert Tortoise Protection. Identifies multiple additional tortoise-specific measures to protect desert tortoises, such as pre-construction clearance surveys, exclusion fencing, and vehicle and work site inspections. Recommends coordination with CDFW and USFWS regarding the need for an Incidental Take Permit (ITP) and habitat compensation for desert tortoise.
- **MM BIO-8**: Revegetation. Requires revegetation of disturbed areas to maximize post-construction habitat value for desert tortoise and other wildlife, and to minimize erosion, weed invasion, and dust sources.

With implementation of the measures identified above, the Project's potential impacts to desert tortoise would be less than significant.

No impacts to critical habitat would occur as the Project does not overlap with critical habitat for desert tortoise.

Birds

Threatened and endangered birds with moderate to high potential to occur in Project area, include the following:

- **Western Burrowing Owl (SC, BCC).** The Western burrowing owl (*Athene cunicularia hypugaea*) is a small, terrestrial owl of open country that occurs year-round in southern California. Burrowing owls favor flat, open annual or perennial grassland or gentle slopes and sparse shrub or tree cover. They use the burrows of ground squirrels and other rodents for shelter and nesting. Where ground squirrel burrows are not available, the owls may use alternate burrow sites or man-made features (such as drain pipes, debris piles, or concrete slabs). In the California deserts, burrowing owls generally occur in low numbers in scattered populations, but they can be found in much higher densities near agricultural lands where rodent and insect prey tend to be more abundant.

  During the 2021 spring surveys no burrowing owl sign or live individuals were observed. During nesting season surveys in February and March 2024, one live owl was observed outside the Project footprint, within the buffer. Evidence of burrowing owl was observed during the April, May, and June surveys, but no live owls were observed at the same burrow location indicating the individual was not nesting there.

  The project area provides suitable foraging and nesting habitat for owls. No evidence of nesting was observed; however, owls and nests may be present on site in future years during project activities and ground disturbance.

- **Swainson's hawk (ST, BBC).** Swainson's hawk (*Buteo swainsoni*) breeds in open habitats throughout much of the western United States and Canada and in northern Mexico. In California, breeding populations of Swainson's hawks occur in desert shrubsteppe, grasslands, and agricultural habitats with tree rows. However, most of the state's breeding sites are in the Great Basin and Central Valley. The only desert breeding occurrences are in the Antelope Valley, over 200 mi (321.87 km) northwest of the Project site. These birds favor open habitats for foraging and are near-exclusive insectivores as adults, but they may also forage on small mammals and reptiles. The Project site provides potential migration season foraging habitat but is well outside the nesting range. No Swainson's hawks were observed during the 2021 spring or 2022 fall surveys.

- **Bank swallow (ST).** The bank swallow (*Riparia riparia*) is a neotropical migrant found primarily in riparian and other lowland habitats in California, west of the deserts, during the spring-fall period. Bank swallows use holes dug in cliffs and riverbanks for cover. They will also roost on logs, shoreline vegetation, and telephone wires. There is no suitable nesting habitat in the Project site, but there is moderate potential for use of the site during migration.

- **Golden Eagle (CFP, WL, BCC).** Golden eagles (*Aquila chrysaetos*) are fully protected under the state Fish and Game Code and are protected under the Federal BGEPA. They are year-round residents throughout most of their range in the western United States. In the southwest, they are more common during winter. In the desert, they generally nest in steep, rugged terrain, often on sites with overhanging ledges, cliffs or large trees as cover. Golden eagles are wide-ranging predators, especially outside of the nesting season. Golden eagle foraging habitat consists of open terrain such as grasslands, deserts, savanna, and early successional forest and shrubland habitats throughout the regional foothills, mountains, and deserts. The mountains and canyons surrounding the Project site provide suitable golden eagle nesting habitat.

  The Project site lacks suitable nesting habitat for golden eagles but supports suitable foraging habitat. The nearest known cliff nest sites that have some potential for golden eagle use are approximately 9

mi (14.48 km) from the Project site. No golden eagles were observed using the Project site during the 2021 spring surveys. Golden eagles have a low to moderate potential to forage on the Project site.

- **American Peregrine Falcon (CFP, BCC).** The American peregrine falcon (*Falco peregrinus anatum*) was formerly listed under CESA and FESA but has been delisted under both Acts. In California, its range is primarily in central to northern California, with wintering habitat and (more recently) nesting occurrences located in southern California. Migrants occur along the coast and in the western Sierra Nevada in spring and fall. It breeds mostly in woodland, forest, and coastal habitats, and favors open landscapes with cliffs as nest sites. They are found irregularly in the southern desert region, generally during the migratory and winter seasons, but also during breeding season in recent years. They nested historically in desert mountain ranges near the Colorado River and may be re-occupying this historical part of their nesting range as their populations recover. Their diet consists primarily of birds and bats. Waterfowl and shorebirds make up a large proportion of their prey, and nest sites are often within foraging range of large water bodies. Suitable migratory and foraging habitat is present throughout the Project site, but no suitable nesting habitat is present. No American peregrine falcons were observed during surveys on the Project site.
- **Riparian birds.** No suitable breeding or wintering habitat for the following federally and State listed threatened or endangered riparian birds occurs within the Project area. However, these species have been recorded at other utility-scale solar energy facilities. There is a moderate potential for them to pass briefly within the Project vicinity during migratory "stopover" periods, but there is no suitable nesting or foraging habitat on the site for these species.
  - Yuma Ridgeway's Rail (*Rallus obsoletus yumanensis*) (FE, ST, CFP),
  - southwestern willow flycatcher (*Empidonax traillii extimus*) (FE, SE),
  - western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) (FT, SE), and
  - least Bell's vireo (Vireo *bellii pusillus*) (FE, SE)

Summary of Impacts to threatened and endangered birds

Construction and Decommissioning

Construction may result in direct impacts to threatened and endangered birds including injury or mortality. Construction activities would cause most mobile vertebrate wildlife, including birds, to leave or attempt to leave the site. Individuals dispersing from the site could be at increased risk of predation and possible vehicle collisions as they flush from cover during site clearing. After leaving their home territories, displaced individuals may be unable to find suitable food or cover in new, unfamiliar areas.

Construction could cause mortality from crushing by construction equipment. In most cases, adult birds would fly away from the disturbance, but bird nests (including eggs or nestlings, if present) would be lost. Bird nests including eggs and nestlings are vulnerable to construction activities that may disrupt nesting behavior or damage nests, birds, or eggs. Direct removal of vegetation and habitat on the project site would reduce availability of nesting, foraging, and stopover habitat.

Land use conversion could exclude birds from portions of their territories. Facilities could present hazards to wildlife. For example, vertical structures can be collision hazards for birds in flight and construction materials such as open pipes or tubing can attract birds, which can become trapped inside.

Noise and lighting during construction could affect threatened and endangered birds in adjacent habitats by disrupting foraging, breeding, sheltering, and other activities; or may cause birds to avoid otherwise suitable habitat surrounding the site. Lighting during construction may affect nocturnal species, by causing alterations to forage or movement behavior, possibly dissuading species from approaching the site. Various other human activities (e.g., vehicle traffic, accumulated waste, or nuisance water sources) can

be injurious to birds, either as direct hazards (vehicle strikes) or as attractants such as food or water that may put wildlife in harm's way.

Herbicides used to treat invasive weeds may also pose risks to bird species. Herbicides that persist on site could injure birds that ingest target plants or come into contact with herbicides on vegetation.

O&M.

After completion of construction and throughout the life of the Project, the solar facilities and other project components may present a collision or electrocution risk to birds. Collisions typically occur when the structures are not visible (e.g., power lines or guy wires at night), or are deceptive (e.g., glazing and reflective glare) or confusing (e.g., light refraction or reflection from mist). The structures that have been empirically demonstrated to result in elevated collision risk at various types of facilities (e.g., tall buildings, communication towers, wind turbines, or concentrating solar thermal towers) would not be required for the project, which consists of low height PV arrays. In the case of solar panels, the collision risk may be linked to a "false-lake effect," wherein birds may mistake PV panels for water bodies, and consequently be attracted to them. Results of post-construction bird and bat monitoring at the neighboring Oberon, Arica, and Victory Pass Projects would inform the magnitude of such an impact, if any, and support the development of adaptive management measures to minimize impacts to avian and bat species.

No impacts would result from expansion of green hydrogen, which would use proposed facilities.

The Project would avoid or minimize these impacts to listed threatened or endangered birds by implementing the following Mitigation Measures (complete Mitigation Measure text provided below). These measures, as described below, require pre-construction nesting bird surveys, biological monitoring and marking of sensitive resources, construction crew training, and revegetation of short-term impact areas. Design measures including vegetation management, invasives management, and minimization of night lighting (Section 1.3) would further protect endangered birds from disturbance and habitat degradation.

- **MM BIO-1:** Biological Monitoring. Requires on-site monitors during work where sensitive biological resources could occur, to ensure activities are halted or relocated to avoid listed species, and to ensure worker compliance with avoidance areas and related requirements.
- **MM BIO-2:** Worker Environmental Awareness Program (WEAP) Training. Requires worker education to ensure familiarity with various protection measures for listed species and other sensitive biological resources.
- **MM BIO-3**: Minimization of Vegetation and Habitat Impacts. Requires flagging to delimit approved work areas and prohibits ground disturbance outside specified areas. Specifies low-impact site preparation wherever facilities do not require permanent vegetation removal.
- **MM BIO-4:** Integrated Weed Management Plan. Requires actions to prevent introductions of weed seeds onto the site, and management measures to control invasive weeds, to prevent habitat degradation.
- **MM BIO-5:** Wildlife Protection. Specifies multiple requirements to prevent harm to wildlife such as vehicle speed limits, pre-construction surveys in work areas, and various requirements to prevent attracting wildlife to work areas (e.g., managing water sources and trash) to prevent inadvertent harm to wildlife.
- **MM BIO-7:** Bird and Bat Protection. Requires a plan for avoiding and minimizing take of migratory birds that may nest on the Project site and birds and bats that may be vulnerable to collision with Project components. Pre-construction nesting bird surveys and protective buffers around active nests will be implemented.

- **MM BIO-8:** Revegetation. Requires revegetation of disturbed areas to maximize post-construction habitat value for desert tortoise and other wildlife, and to minimize erosion, weed invasion, and dust sources.
- **MM BIO-10:** Burrowing Owl Protection. Requires preparation of a plan for avoiding, minimizing, and mitigating potential impacts to burrowing owl. The plan would require pre-construction surveys, protection of owls occupying the site, passive relocation, and associated compensation requirements to fully mitigate any incidental take.

With implementation of mitigation measures, the Project's potential impacts to listed threatened and endangered birds would be less than significant.

None of the species above were observed during 2021 spring or 2022 fall surveys.

C) Special-Status Species. The Project may adversely affect several special-status plant and wildlife species that have moderate to high potential to occur within the Project site. If present on the Project site, the Project could cause disturbance to one or more of these species. With implementation of BIO MMs, impacts to special-status species would be less than significant.

Laws and Regulations

- **Migratory Bird Treaty Act.** The Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-711) is a treaty signed by the United States, Canada, Mexico, and Japan that prohibits take of any migratory bird, including eggs or active nests, except as permitted by regulation (e.g., hunting waterfowl or upland game species). Under the MBTA, "migratory bird" is broadly defined as "any species or family of birds that live, reproduce or migrate within or across international borders at some point during their annual life cycle" and thus applies to most native bird species.
- **Plant Protection Act of 2000.** Prevents importation, exportation, and spread of pests that are injurious to plants, and provides for the certification of plants and the control and eradication of plant pests. The Act consolidates requirements previously contained within multiple federal regulations including the Federal Noxious Weed Act, the Plant Quarantine Act, and the Federal Plant Pest Act.
- **Native Birds – California Fish and Game Code Sections 3503 and 3513.** California Fish and Game Code Section 3503 prohibits take, possession, or needless destruction of bird nests or eggs except as otherwise provided by the Code; Section 3503.5 prohibits take or possession of birds of prey or their eggs except as otherwise provided by the Code; and Section 3513 provides for the adoption of the MBTA's provisions (above). With the exception of a few non-native birds such as European starling, the take of any birds or loss of active bird nests or young is regulated by these statutes. Most of these species have no other special conservation status as defined above. The administering agency for these sections is the CDFW. As with the MBTA, these statutes offer no statutory or regulatory mechanism for obtaining an incidental take permit for the loss of non-game migratory birds.

Special-Status Plants

Several public agencies and private entities maintain lists of plants of conservation concern. The CDFW compiles these species including California Rare Plant Rank (CRPR) 1, 2, 3, or 4. These plants are treated here as "special-status species." Native cacti, succulents, and most trees are generally not ranked as special status plant species, but the harvesting of these native plants is regulated under the California Native Plant Protection Act (Fish and Game Code §§ 1900-1913) and the California Desert Native Plant Act of 1981 (Food and Agricultural Code § 80001 et. seq.; Fish & Game Code §§ 1925-1926).

Because of continued drought conditions in 2021, which limited the germination of forbs, focused special status plant surveys were not conducted. However, incidental observations of rare plant occurrences and/or suitable habitat were noted during surveys. Suitable habitat for several special-status plants occurs on the Project site, and records and observations are documented in the vicinity; however, they were not

observed on the Project site during recent surveys and their presence could not be conclusively determined. These include (Alverson's foxtail cactus (CRPR 4.2), glandular ditaxis (CRPR 2B.2), California ditaxis (CRPR 3.2), Utah milkvine (CRPR 4.2), desert unicorn plant (CRPR 4.3), and spiny abrojo (CRPR 4.3).

Several species of cactus and native trees were observed including ocotillo (*Fouquieria splendens* ssp. *splendens*), smoke tree (*Psorothamnus spinosus*), and palo verde (*Parkinsonia florida*). There were four ocotillo total observed distributed within the site, site buffer, and adjacent lands (see Appendix B, BRTR) which will be salvaged and transplanted per MM BIO-8, Revegetation.

Refer to the BRTR (Appendix B) for details on special-status plants.

- **Emory's crucifixion thorn (CRPR 2B.2).** Emory's crucifixion thorn (*Castela emoryi*) is uncommon but widespread in broad sandy wash habitat in the area. There are several records of occurrences within Riverside County, near or within Desert Center, including Desert Sunlight Solar Farm, just east of the Project, and Athos Renewable Energy Project. Emory's crucifixion thorn has 177 records occurring within California. In Riverside County, several records are near or within Desert Center, including Desert Sunlight Solar Farm just east of the Project and at Athos Solar Project. There is suitable habitat for crucifixion thorn on the Project site; however, no individuals were observed during Project surveys.
- **Alverson's Foxtail Cactus (CRPR 4.3).** Alverson's foxtail *(Coryphantha alversonnii)* has a California rare plant rank (CRPR) of 4.3, meaning this species has limited distribution in the state. It is a perennial herb (stem succulent) that is native to California, and also found in Arizona. It usually occurs in granitic soil but is sometimes found in sandy or rocky soil within Mojavean and Sonoran Desert scrub. There are 55 records of this species in California, and one historic record within the Project site. The entire Project site is modeled as predicted occupied habitat for Alvson's foxtail cactus. No occurrences were observed during the 2021 spring surveys.
- **Glandular Ditaxis: (CRPR 2B.2).** Glandular ditaxis (*Ditaxis claryana*) is an annual or short-lived perennial associated with Sonoran Desert scrub habitats and blooms in the fall following the start of the rainy season. There are 49 occurrences in the Consortium of California Herbaria and there is one record within Desert Center and another near Corn Spring, south of I-10. Suitable habitat does occur on the Project site, but it was not observed during the 2021 spring or 2022 fall surveys.
- **California Ditaxis (CRPR 3.2).** California ditaxis (*Ditaxis serrata* var*. californica*) has a CRPR of 3.2 and a NatureServe rank of G3G4/S2 S, which indicates more information is needed about the status of this species. California ditaxis may be a glabrous variety of the common Ditaxis neomexicana. It occupies Sonoran Desert scrub vegetation and prefers sandy washes and alluvial fans of the foothills and lower desert slopes. It is known to occur in San Bernardino, Riverside, Imperial, and San Diego counties of California and in Sonora, Mexico. There are 45 records of this species in California, primarily from Riverside County. Regional surveys by Ironwood botanists confirm that the species is present in disturbed fallow agricultural fields in and around Desert Center, south of the Project site. There is suitable habitat on the Project site, but it was not observed during the 2021 spring or 2022 fall surveys.
- **Utah Milkvine (CRPR 4.2).** Utah milkvine (*Cynanchum utahense, Funastrum utahense*) has 149 records from the Consortium of California Herbaria database primarily from San Bernardino and San Diego counties, but there are also several records in Riverside County. There is one record of this species north of Desert Center and another record just southwest of Palen Lake. This twining perennial occurs in sandy, gravelly Mojavean desert scrub. Suitable habitat exists throughout the Project site, but Utah milkvetch was not observed during the 2021 spring or 2022 fall surveys.
- **Desert Unicorn Plant (CRPR 4.3).** Desert unicorn plant (*Proboscidea althaeifolia*) has a California rare plant rank of 4.3, limited distribution. It is a low-growing, perennial species that occurs in sandy washes within Sonoran Desert scrub vegetation in San Bernardino, Imperial, Riverside, and San Diego counties of California. There are 36 records in Riverside County, several of which are from the Chuckwalla

Mountains and Desert Center area. It is a late-season bloomer (from May to August), but has large and distinctive seed pods that can be detected during the spring season and a fleshy root structure that can remain dormant in dry years. Suitable habitat occurs within the Project site, but no occurrences of this species were observed during the 2021 spring or 2022 fall surveys.

- **Spiny Abrojo (CRPR 4.3).** Spiny abrojo (*Condalia globose* var*. pubescens*) has limited distribution in California and can also be found in Arizona and Mexico. It is a perennial shrub that occurs in desert scrub primarily in the Sonoran Desert. It occurs only in Imperial and Riverside counties, with the closest records within the Chuckwalla bench, south of the Chuckwalla mountains, often in or near washes or roads. Suitable habitat occurs on the Project site, but no occurrences of this species were observed during the 2021 spring and 2022 fall surveys.

Summary of impacts to special-status plants

Construction, O&M, and Decommissioning

The Project would potentially substantially degrade approximately 133 acres of natural habitat that is suitable to support special-status species. As part of the decommissioning of the Project, currently disturbed habitats would be restored. No impacts would result from expansion of green hydrogen, which would use proposed facilities.

Without minimization or avoidance measures, the Project could cause disturbance to and mortality of special-status plants that have potential to occur in the Project area during construction, O&M, or decommissioning activities. Vegetation, including the native vegetation and habitat, would be removed or cut during clearing and grading. Soils throughout the Project site would be affected by some form of ground disturbance. Altered hydrology from site preparation could directly or indirectly affect special-status plants. Construction activities could accumulate dust on special-status plants that could diminish gas exchange or photosynthesis. Other impacts could include disturbance from increased human presence and the introduction and spread of invasive weeds, resulting in decreased habitat quality.

These direct and indirect adverse impacts to special-status plants and their habitat would be significant, however, impacts will be avoided and minimized with implementation of the following mitigation measures, summarized below (complete Mitigation Measure language provided below):

- **MM BIO-1:** Biological Monitoring. Requires on-site monitors during work where sensitive biological resources could occur, to ensure activities are halted or relocated to avoid significant impacts, and to ensure worker compliance with avoidance areas and related requirements.
- **MM BIO-2:** Worker Environmental Awareness Program (WEAP) Training. Requires worker education to ensure familiarity with various protection measures for sensitive biological resources.
- **MM BIO-3:** Minimization of Vegetation and Habitat Impacts. Requires flagging to delimit approved work areas and prohibits ground disturbance outside specified areas. Specifies low-impact site preparation wherever facilities do not require permanent vegetation removal.
- **MM BIO-4:** Integrated Weed Management Plan. Requires actions to prevent introductions of weed seeds onto the site, and management measures to control invasive weeds, to prevent habitat degradation.
- **MM BIO-8:** Revegetation. Requires revegetation of disturbed areas to maximize post-construction habitat value, and to minimize erosion, weed invasion, and dust sources.

With mitigation, impacts to special-status plants would be less than significant.

Special-Status Wildlife

Special status wildlife are species that are not federally or state listed as threatened or endangered, but that have special protections under other regulations, as described above. Special status wildlife species

observed on the Project site or with at least a moderate potential to occur, based on the presence of suitable habitat, are presented below.

Refer to the BRTR (Appendix B) for additional information on all special-status wildlife.

Amphibians

- **Couch's Spadefoot Toad (SSC).** Couch's spadefoot toad (*Scaphiopus couchii*) is often found in shortgrass plains, mesquite savannah, creosote bush desert, thorn forest, and tropical deciduous forest (Mexico) and other areas of low rainfall. It is considered an opportunistic species because it only appears when rainfall forms temporary pools and potholes with ponded water persisting longer than 10-12 days, which is the period required for breeding, hatching, and metamorphosis. Runoff basins at the base of sand dunes are also sites of reproduction. In California, this species is known to occur in the low desert region, especially the Colorado River corridor. It burrows underground or occupies rodent burrows when inactive.

  Couch's spadefoot toad was not observed during surveys, but suitable breeding habitat may be present on the Project site in areas where water accumulation may occur. No areas were identified as potential breeding habitat during 2021 surveys. However, areas adjacent to the Project site on the eastern boundary where a human-made berm is located may provide suitable breeding habitat, which may be impacted by the Project.

Birds

- **Raptors.** In addition to golden eagle and American peregrine falcon discussed above, several other CDFW special-status birds of prey are found seasonally in the region, especially during winter and migration. These include prairie falcon (*Falco mexicanus*) (WL, BCC), ferruginous hawk (*Buteo regalis*) (WL, BCC), short-eared owl (*Asio flammeus*) (SSC), and Northern harrier (*Circus cyaneus*) (SSC).

  None of these raptors are expected to nest on the site due to lack of suitable habitat. Suitable migratory and foraging habitat is present on the Project site and these species have at least a moderate potential to fly over and forage. Suitable winter or migratory season foraging habitat for these raptors is widely available throughout the region.

- **Migratory and upland perching birds.** Several special-status migratory and upland perching bird species have at least a moderate potential to occur on the Project site, as listed below. Loggerhead shrike and California horned lark were observed on the site during the field surveys. Other special-status birds could fly over the site during migratory flight, dispersal between off-site habitat areas, or briefly occupy the site as a stopover during migration or dispersal.

<u>High Potential for nesting/foraging</u>
- Le Conte's thrasher (*Toxostoma lecontei*) (SSC)
- Black-tailed gnatcatcher (*Polioptila melanura*) (WL)
- Loggerhead shrike (*Lanius ludovicianus*) (BCC, SSC) - observed
- California horned lark (*Eremophila alpestris actia*) (WL) – observed

<u>Moderate Potential for nesting/foraging</u>
- Lucy's warbler (*Leiothlypis luciae*) (BCC, SSC)

<u>Moderate Potential for migration/foraging</u>
- Sonora yellow warbler (*Setophaga petechia sonorana*) (BCC, SSC)
- Crissal thrasher (*Toxostoma crissale*) (SSC)
- Lawrence's golfinch (*Spinus lawrencei*) (BCC)
- Purple martin (*Progne subis*) (SSC)
- Vermillion flycatcher (*Pyrocephalus rubinus*) (SSC)
- Vesper sparrow (*Pooecetes gramineus*) (SSC)
- Bendire's thrasher (*Toxostoma bendirei*) (BCC, SSC)
- Mountain plover (*Charadrius montanus*) (BCC, SSC)
- Costa's hummingbird (*Calypte costae*) (BCC)

<u>Moderate Potential for flyover</u>
- American white pelican (*Pelecanus erythrorhynchos*) (SSC)
- Sandhill crane (*Grus canadensis*) (SSC)
- Yellow-headed blackbird (*Xanthocephalus xanthocephalus*) (SSC)
- Long-billed curlew (*Numenius americanus*) (BCC, WL)
- Yellow-breasted chat (*Icteria virens*) (SSC)
- Vaux's swift (*Chaetura vauxi*) (SSC)
- Redhead (*Aythya americana*) (SSC)

Mammals

- **Bats.** Seven special status bat species may forage on or near the Project site. These bats are ranked as CDFW Species of Special Concern *(SSC)*, including pallid bat *(Antrozous pallidus)*, Townsend's big-eared bat *(Corynorhinus townsendii)*, western mastiff bat *(Eumops perotis)*, California leaf-nosed bat *(Macrotus californicus)*, western yellow bat *(Lasiurus xanthinus)*, pocketed free-tailed bat *(Nyctinomops femorosaccus)*, and big free-tailed bat *(Nyctinomops macrotis)*.
- Suitable, but limited, roosting habitat may occur for several of these species in nearby areas such as freeway underpasses. Other special-status bat species known from the region typically inhabit rocky sites and would not be expected to use the Project site for roosting. No sign of bats was observed on the Project site during the 2021 spring or 2022 fall surveys; however, several of these bat species were detected in the vicinity during acoustic bat surveys at the nearby Palen Solar Power Project.
- **Desert kit fox (CPF).** Desert kit fox (*Vulpes macrotis arsipus*) is protected by the California Code of Regulations (Title 14, CCR: §460) and Fish and Game Commission Section 4000 as a fur-bearing mammal. Title 14 of the California Code of Regulations, Section 460, stipulates that desert kit fox may not be taken at any time. Desert kit fox is a fossorial mammal that occurs in arid open areas, shrub grassland, and desert ecosystems within the Mojave Desert. Desert kit fox typically occurs in association with its prey base, which includes small rodents, primarily kangaroo rats, rabbits, lizards, insects, and in some cases, immature desert tortoises. Burrow complexes that have multiple entrances provide shelter, escape, cover, and reproduction, but desert kit fox may utilize single burrows for temporary shelter. During the 2021 spring surveys, no live desert kit foxes, burrows, or dens were observed, and only scat was observed in the buffer. During 2022 fall surveys one inactive burrow was encountered.
- **American badger (SSC).** American badgers (*Taxidea taxus*) occupy mountains, deserts, and interior valleys, and are most abundant in drier open stages of most shrub, forest, and herbaceous habitats. They occupy areas where burrowing animals are available as prey and where soils are friable. Suitable habitat exists for American badgers throughout the Project site. There are several canid burrows on the Project site that could be used by the species, although no badgers were observed during the 2021 spring or 2022 fall surveys and none of the burrows showed definitive badger sign.
- **Burro Deer (CPGS).** The burro deer (*Odocoileus hemionus eremicus*) is a subspecies of mule deer (Odocoileus hemionus) that inhabits desert dry-wash woodland communities in the Colorado region of the Sonoran Desert near the Colorado River. Some burro deer are year-round residents along the Colorado River, while others are transient and move between mesic and arid desert areas in response to seasonal water and forage availability. During hot summers, burro deer concentrate along the Colorado River or the Coachella Canal where water developments have been installed and where microphyll woodland is dense and provides good forage and cover. With late summer thundershowers and cooler temperatures, burro deer move away from the Colorado River and Coachella Canal into larger washes or wash complexes in the foothills and nearby mountains. Burro deer likely move through the Project site and its vicinity to access artificial water sources from nearby agriculture and aquaculture farms. Burro deer scat and tracks were observed throughout the Project site.

Summary of Impacts to special-status wildlife

Construction, O&M, and Decommissioning

The Project would potentially degrade approximately 133 acres of natural habitat. No impacts would result from expansion of green hydrogen, which would use proposed facilities.

Without minimization or avoidance measures, the Project could cause disturbance, mortality, or injury to special-status wildlife during construction, O&M, or decommissioning activities, as detailed for b) threatened and endangered reptiles and threatened and endangered birds. Land use conversion could reduce

local habitat availability, possibly reducing access to food, water, or other resources, and impact population density. Wildlife would be vulnerable to impacts such as mortality or injury due to crushing by site preparation equipment or vehicle strikes. Special-status wildlife could be harmed during clearing or grading activities, or could become entrapped within open trenches and pipes. Individuals, such as burrowing owls, could be crushed or entombed in their burrows or disturbed by noise or vibrations from heavy equipment, and behavior could be disrupted during construction or operation of facilities. Special-status wildlife may be attracted to the construction area by shade beneath vehicles, equipment, or materials, or the cooler conditions created by the application of water to control dust, placing them at higher risk of injury or mortality. Project construction and O&M could create "subsidies" such as food, water, or nest sites, for common ravens or other predators. Other effects could include the introduction and spread of invasive weeds in suitable habitat and disturbance from increased human presence, noise, and night lighting.

Impacts to special-status wildlife would be avoided or minimized through implementation of the following BIO Mitigation Measures (complete Mitigation Measure language provided below). Design measures including vegetation management, invasives management, and minimization of night lighting (Section 1.3) would further protect wildlife from disturbance and habitat degradation.

- **MM BIO-1:** Biological Monitoring. Requires on-site monitors during work where sensitive biological resources could occur, to ensure activities are halted or relocated to avoid special-status wildlife, and to ensure worker compliance with avoidance areas and related requirements.
- **MM BIO-2:** Worker Environmental Awareness Program (WEAP) Training. Requires worker education to ensure familiarity with various protection measures for special-status wildlife and other sensitive biological resources.
- **MM BIO-3:** Minimization of Vegetation and Habitat Impacts. Requires flagging to delimit approved work areas and prohibits ground disturbance outside specified areas. Specifies low-impact site preparation wherever facilities do not require permanent vegetation removal.
- **MM BIO-4:** Integrated Weed Management Plan. Requires actions to prevent introductions of weed seeds onto the site, and management measures to control invasive weeds, to prevent habitat degradation.
- **MM BIO-5:** Wildlife Protection. Specifies multiple requirements to prevent harm to wildlife such as vehicle speed limits, pre-construction surveys in work areas, and various requirements to prevent attracting wildlife to work areas (e.g., managing water sources and trash) to prevent inadvertent harm to wildlife.
- **MM BIO-8:** Revegetation. Requires revegetation of disturbed areas to maximize post-construction habitat value for special-status wildlife, and to minimize erosion, weed invasion, and dust sources.

Project impacts specific to special-status birds and bats would be collision and electrocution from Project infrastructure during O&M, described under the summary of impacts to T&E birds, above (Section b.).

Other potential impacts to birds and bats due to construction may include noise or lighting that may deter them from using surrounding habitat for nesting, roosting, foraging, or as a migratory stopover site. Grading during construction may remove vegetation and potential nesting and roosting habitat. If construction is performed during nesting season, nests, eggs, or young could also be destroyed.

Impacts to special-status birds and bats would be avoided or minimized through implementation of the following additional BIO MMs:

- MM BIO-7: Bird and Bat Protection. Requires a plan for avoiding and minimizing take of migratory birds that may nest on the Project site and birds and bats that may be vulnerable to collision with Project components. Pre-construction nesting bird surveys and protective buffers around active nests will be implemented.

With implementation of the MMs identified above, impacts to special-status wildlife would be less than significant.

d) Wildlife Movement. The California Desert Connectivity Project provides a comprehensive and detailed habitat connectivity analysis for the California deserts (See BRTR, Appendix B). The Connectivity Project identified a Desert Linkage Network to maintain habitat for movement between landscape blocks. The landscape blocks identified in the Project vicinity are the Palen–McCoy Mountains to the northeast and the Chocolate Mountains to the south. Broad habitat linkages connect these landscape blocks.

The Bureau of Land Management (BLM) Desert Renewable Energy Conservation Plan (DRECP) (BLM 2016) identifies a wide multi-species linkage area that overlaps the Project site. However, since the Project site is located on private lands, the requirements in the DRECP regarding the habitat linkage would not apply to the Project site.

Summary of Impacts to wildlife movement

Construction, O&M, and Decommissioning

Development within the Project site would reduce the available wildlife movement habitat for many species, including desert tortoise and burro deer. Construction activities could temporarily discourage wildlife from approaching the Project site due to noise and disturbance.

Noise and lighting during construction could affect wildlife movement within and through adjacent habitats; or may cause wildlife to avoid otherwise suitable habitat surrounding the site. Lighting during construction may affect movement of nocturnal species, by causing alterations to movement behavior, possibly dissuading species from approaching the site.

After construction, the proposed facilities would interfere with local-scale wildlife movement by any species unable to cross the facilities due to project fencing. Night lighting during O&M may also affect wildlife movement around the site, as described.

No impacts would result from expansion of green hydrogen, which would use the proposed facilities.

Design measures including minimization of night lighting (Section 1.3) would protect wildlife from disturbance while moving in and around the Project site. With the implementation of the following BIO Mitigation Measures, impacts to wildlife movement or nursery sites would be less than significant.

- **MM BIO-1:** Biological Monitoring. Requires on-site monitors during work where sensitive biological resources could occur, to ensure activities are halted or relocated to avoid sensitive biological resources, and to ensure worker compliance with avoidance areas and related requirements.
- **MM BIO-2:** Worker Environmental Awareness Program (WEAP) Training. Requires worker education to ensure familiarity with various protection measures for sensitive biological resources.
- **MM BIO-3:** Minimization of Vegetation and Habitat Impacts. Requires flagging to delimit approved work areas and prohibits ground disturbance outside specified areas. Specifies low-impact site preparation wherever facilities do not require permanent vegetation removal.
- **MM BIO-4:** Integrated Weed Management Plan. Requires actions to prevent introductions of weed seeds onto the site, and management measures to control invasive weeds, to prevent habitat degradation.
- **MM BIO-5:** Wildlife Protection. Specifies multiple requirements to prevent harm to wildlife such as vehicle speed limits, pre-construction surveys in work areas, and various requirements to prevent attracting wildlife to work areas (e.g., managing water sources and trash) to prevent inadvertent harm to wildlife.
- **MM BIO-7**: Bird and Bat Protection. Requires a plan for avoiding and minimizing take of migratory birds that may nest on the Project site and birds and bats that may be vulnerable to collision with Project

components. Pre-construction nesting bird surveys and protective buffers around active nests will be implemented.

- **MM BIO-8:** Revegetation. Requires revegetation of disturbed areas to maximize post-construction habitat value for special-status wildlife, and to minimize erosion, weed invasion, and dust sources.

e) Riparian Habitats & Sensitive Natural Communities

Laws and Regulations

- **Clean Water Act.** The Clean Water Act (33 U.S.C. 1251 et seq.) establishes legal requirements for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters.
  - **Section 401.** In the State of California, State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs), in conjunction with U.S. Army Corps of Engineers USACE, administer Section 401 of the CWA (33 U.S.C. 1341) in relation to permitting fill of federally jurisdictional waters. Additionally, beyond federal jurisdiction the SWRCB and the RWQCBs may exert regulatory authority over Waters of the State (WOTS), which are defined in Section 13050(e) of the Porter-Cologne 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 WDRs.

    Section 401 requires that an applicant for a federal license or permit that allows activities resulting in a discharge to waters of the United States must obtain a State certification that the discharge complies with other provisions of the Clean Water Act. The RWQCBs administer the certification program in California.
  - **Section 404.** Section 404 establishes a permit program administered by the USACE regulating the discharge of dredged or fill material into Waters of the United States (WOTUS), including wetlands. Jurisdictional Waters of the U.S. defined in the Clean Water Act (CWA) include interstate waters such as lakes, rivers, streams (including intermittent streams) and their tributaries, but exclude ephemeral channels. In the case of intrastate waters (i.e., the ephemeral or intermittent drainage channels on the site), federal jurisdiction as waters of the U.S. applies only where degradation or destruction could affect interstate or foreign commerce.

    USACE asserts jurisdiction over Traditional Navigable Waters (TNW), wetlands adjacent to TNW, and non-navigable tributaries of TNW that are relatively permanent (with continuous flow at least seasonally) and their adjacent wetlands. TNW are defined as "those Waters that are subject to the ebb and flow of the tide and/or are presently used, or have been used in the past, or may be susceptible for use to transport interstate or foreign commerce" (33 CFR Part 329.4). Navigable Waters include the open ocean, tidal bays, salt marshes, and some large rivers and lakes. The upstream limit of a navigable river is the head of navigation as designated by USACE (33 CFR Part 329.4). Wetlands are defined as "Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that normally do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include marshes, swamps, bogs, and similar areas" (Environmental Laboratory 1987).

    Implementing regulations by the USACE are found at 33 CFR Parts 320-330. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines and were developed by the EPA in conjunction with the USACE (40 CFR Parts 230). The Guidelines allow the discharge of dredged or fill material into the aquatic system only if there is no practicable alternative that would have less adverse impacts.
- **Lake or Streambed Alteration Agreements – California Fish and Game Code Sections 1600-1616.** Under these sections of the Fish and Game Code, an applicant is required to notify CDFW prior to

constructing a project that would divert, obstruct, or change the natural flow, bed, channel, or bank of a river, stream, or lake. CDFW traditionally defines a stream (including creeks and rivers) as a "body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life." A stream includes watercourses with surface or subsurface flow that supports or has supported riparian vegetation. Areas within CDFW jurisdiction include riparian habitats associated with watercourses, where "riparian habitat" is not defined in the statute or regulations (Title 14, Section 1.72) but typically refers to vegetation associated with a stream channel. The limits of jurisdiction include ephemeral, intermittent, and perennial, intermittent, and ephemeral watercourses, desert washes, and watercourses with subsurface flows, and include the outermost edge of riparian vegetation or the top of bank of streams or lakes, whichever is wider.

Preliminary notification and project review generally occur during the environmental review process. When a fish or wildlife resource may be substantially adversely affected, CDFW is required to propose reasonable project changes to protect the resource. These modifications are formalized in a Lake and Streambed Alteration Agreement (LSAA) that becomes part of the plans, specifications, and bid documents for the project.

- **California Porter-Cologne Water Quality Control Act.** Pursuant to the California Porter-Cologne Water Quality Control Act, the SWRCB and the nine RWQCBs may require permits ("waste discharge requirements") for the fill or alteration of "Waters of the State." The term "Waters of the State" is defined as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code, Section 13050[e]). Although "waste" is partially defined as any waste substance associated with human habitation, the SWRCB interprets this to include fill discharge into water bodies. The SWRCB and the RWQCB have interpreted their authority to require waste discharge requirements to extend to any proposal to fill or alter "Waters of the State," even if those same waters are not under the jurisdiction of the USACE. Pursuant to this authority, the SWRCB and the RWQCB may require the submission of a "report of waste discharge" under Water Code Section 13260, which is treated as an application for a waste discharge requirement.
- **Riverside County General Plan.** Per Riverside County's General Plan (Riverside County 2015), Multipurpose Open Space Element, the intent of Riverside County is to sustain "living" riparian habitats to the maximum extent possible. Policies OS 5.1 through OS 5.7 address watercourses, floodplains, floodways, the floodplain fringe, and riparian areas.

  Watercourse is defined as any natural stream, river, creek, waterway, gully, ravine or wash in which water flows in a definite direction or course, either continuously or intermittently, and has a definite channel, bed and banks. A watercourse also includes any vegetation along the banks as well as any adjacent areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions including swamps, marshes, and bogs.

  Floodplains are comprised of the floodway and the floodway fringe. They are the low, flat, periodically flooded lands adjacent to rivers, lakes and oceans inundated by 100-year flood. The floodway is the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the 100-year flood without cumulatively increasing the water surface elevation more than one foot. The floodway fringe is that portion of the floodplain between the floodway and the limits of the existing 100-year floodplain.

  The term "riparian area" is defined as a wetland which occurs along a watercourse. Upland habitat is elevated above lowlands occurring along or within a river, stream, lake, etc. Upland habitat is that which does not meet the criteria of federal-and-state jurisdictional wetlands.

Policy OS 5.3 requires that all development be set back with adequate riparian buffers. Policy OS 5.6 is to "Preserve and enhance existing native riparian habitat and prevent obstruction of natural watercourses."

- **Sensitive Natural Communities.** Sensitive natural communities are those that are listed to CDFW's California Natural Diversity Database (CNDDB) due to the rarity of the community in the state or throughout its entire range. Ranking of alliances according to their degree of imperilment (as measured by rarity, trends, and threats) follows NatureServe's Heritage Methodology (Faber-Langendoen et al. 2012), in which all alliances are listed with a G (global) and S (state) rank. Both Global and State ranks represent a letter and number score that reflects a combination of Rarity, Threat, and Trend factors. Natural Communities with ranks of S1-S3[3]3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents (CDFW, 2023).

Existing Conditions

There are no sensitive natural communities on the Project site. One vegetation type, *Larrea tridentata - Encelia farinosa* (creosote bush - brittle bush scrub) shrubland alliance (0.20 acre), is identified by the CDFW with a state rarity rank of S4, but is not considered sensitive (S1-S3) (BRTR, Appendix B).

There are no riparian habitats on the Project site. Potential State jurisdictional waters delineated within the Project Site consist of natural channels referred to as "Unvegetated Ephemeral Dry Washes" (Aquatic Resources Delineation, Appendix C). No watercourse floodplains or other water features were identified during the field investigation. Surveyors did not identify xeric riparian woodlands (desert ironwood or blue palo verde, also referred to as "Desert Dry Wash Woodlands") with enough density along the Unvegetated Ephemeral Dry Washes to map these communities. Accordingly, no Desert Dry Wash Woodlands occurs on the Project Site. However, sporadic and isolated occurrences of wash-dependent shrubs and trees were observed within or along the mapped Unvegetated Ephemeral Dry Washes.

Ephemeral desert washes and channels on the site do not support wetlands or other sensitive natural communities; however, ephemeral channels may provide habitat elements for wildlife such as increased plant diversity, cover, or food availability, and they serve to convey water and sediment downstream, supporting offsite habitat values.

The Project Site is intersected by three NHD-mapped ephemeral drainages that historically connected with Big Wash to the east. Big Wash is shown as an intermittent stream on USGS topographic maps and is identified as an intermittently flooded riverine system by USFWS NWI. Big Wash conveys flows to Palen Lake, an intrastate isolated ephemeral lake that lacks a direct or subsurface connection to a known TNW (Traditional Navigable Waters) or tributary to a TNW. Given the absence of a nexus to federal WOTUS, the ephemeral dry wash channels on the Project site would not be subject to federal jurisdiction pursuant to CWA Section 404 under the current WOTUS guidance (Pre-2015/Rapanos).

These ephemeral channels meet jurisdictional criteria as waters of the state according to California Fish and Game Code and the Porter-Cologne Water Quality Act and are regulated by the CDFW and RWQCB.

[3] The state rank (S-rank) refers to the imperilment status only within California's state boundaries.
S1 = Critically Imperiled—Critically imperiled in the state because of extreme rarity (often 5 or fewer populations) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the state.
S2 = Imperiled—Imperiled in the state because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the state.
S3 = Vulnerable—Vulnerable in the state due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state.
S4 = Apparently Secure—Uncommon but not rare in the state; some cause for long-term concern due to declines or other factors.
S5 = Secure—Common, widespread, and abundant in the state.

Summary of Impacts to riparian habitats & sensitive natural communities

Construction, O&M, and Decommissioning

The Project is expected to impact approximately 24.3 ac (176,349 linear feet [linear feet]) of waters in the form of "Unvegetated Ephemeral Dry Washes" within the proposed solar facility (waters of the state (ephemeral wash) potentially subject to RWQCB jurisdiction/Unvegetated Ephemeral Dry Wash potentially subject to CDFW jurisdiction) (Aquatic Resources Delineation, Appendix C).

Potential significant impacts to the unvegetated ephemeral washes could include increased siltation, fluvial transport of silts or pollutants off site via the ephemeral channels or altered flows causing downstream erosion or eliminating natural transport of sands and water to downstream habitat areas.

Impacts would result from excavation, grading, and clearing and mowing of vegetation. Soils throughout the Project site would be affected by some form of ground disturbance, which could result in soil erosion, and lowered water quality through increased turbidity and sediment deposition into local drainageways. However, the Project site has slopes ranging from 1% to 3%; thereby, minimizing the potential for erosion. Altered hydrology from site preparation could directly or indirectly affect vegetation and jurisdictional waters; however, Project activities would not substantially alter the existing drainage pattern of the site. Accidental spills or disposal of harmful materials used during construction could wash into and pollute jurisdictional waters. Since the area is in an arid climate, the local drainageways are normally dry. In the event of a contaminant spills during construction, it would be cleaned up prior to any water being contaminated and conveyed downstream.

After site preparation and construction, water and sediment would be conveyed downslope, across the site, by sheet flow or within channels. Surface flow patterns, velocities, and sediment loads may be altered within the site by solar panel and facility foundations, access roads, and other features. Solar panel areas would be mowed, maintaining existing onsite drainage patterns in those areas.

No impacts would result from expansion of green hydrogen, which would use proposed facilities.

With the implementation of the following BIO Mitigation Measures, impacts to sensitive vegetation and jurisdictional waters would be less than significant.

- **MM BIO-3**: Minimization of Vegetation and Habitat Impacts. Requires flagging to delimit approved work areas and prohibits ground disturbance outside specified areas. Specifies low-impact site preparation wherever facilities do not require permanent vegetation removal.
- **MM BIO-4**: Integrated Weed Management Plan. Requires actions to prevent introductions of weed seeds onto the site, and management measures to control invasive weeds, to prevent habitat degradation.
- **MM BIO-8:** Revegetation. Requires revegetation of disturbed areas to maximize post-construction habitat value for desert tortoise and other wildlife, and to minimize erosion, weed invasion, and dust sources.
- **MM BIO-9:** Streambed and Watershed Protection. Requires CDFW and RWQCB permits for impacts to jurisdictional waters. Requires implementation of BMPs for spills of fuels and work near off-site drainages. Requires offset of impacts to jurisdictional waters through habitat compensation. Habitats used for compensation must provide habitat value that is comparable to the habitat impacted.

A site-specific Stormwater Pollution and Prevention Plan (SWPPP) would be required and implemented and would prevent water contamination from spills and sediment disturbance during construction. MM HYD-1 Stormwater Pollution and Prevention Plan (SWPPP) ensures that a SWPPP shall be prepared and implemented. The SWPPP would include measures for diverting flow around disturbed areas, managing overland flow with temporary and permanent measures such as silt and straw fencing, stabilizing areas of concentrated flow, and prevention of tracking of sediment by vehicles.

In addition to the mitigation measures identified above, impacts to jurisdictional waters are subject to CDFW and RWQCB authorization. Both agencies may specify permit conditions beyond the mitigation measures and habitat compensation identified here.

f) Wetlands. No wetlands are present on the Project site or in the vicinity and the Project would have no impact on wetlands. The project would involve disturbance to several ephemeral dry channels that meet CDFW and RWQCB criteria for jurisdictional waters (see Section e.) but would not result in significant impacts to channels.

g) Local Policies. The following policies outlined in the Riverside County General Plan (2015) address biological resources. The Project would be in compliance with the Riverside County General Plan. No impacts would occur.

Riverside County General Plan (2015) includes policies addressing biological resources within the Land Use (LU) and Open Space (OS) elements, as follows:

- Policy LU 9.1: Provide for permanent preservation of open space lands that contain important natural resources, cultural resources, hazards, water features, watercourses including arroyos and canyons, and scenic and recreational values (AI 102).

  Consistency. Mitigation measures provide protection of species, habitats, and waters in coordination with CDFW, USFWS, and RWQCB.

- Policy LU 9.2: Require that development protect environmental resources by compliance with the Multipurpose Open Space Element of the General Plan and federal and state regulations such as CEQA, NEPA, the Clean Air Act, and the Clean Water Act.

  Consistency. The Project would comply with federal and state regulations.

- Policy LU 24.1: Cooperate with the CDFW, USFWS, and any other appropriate agencies in establishing programs for the voluntary protection, and where feasible, voluntary restoration of significant environmental habitats (AI 10).

  Consistency. Mitigation measures provide protection of species and restoration of habitats in coordination with CDFW, USFWS, and RWQCB.

- Policies OS 5.1 through OS 5.7: Addressing development near and protection of watercourses, floodplains, floodways, the floodplain fringe, and riparian areas.

  Consistency. Riparian habitats do not occur on the site. Mitigation measures provide protection of Unvegetated Ephemeral Dry Washes in coordination with Riverside County, CDFW, and RWQCB.

- Policy OS 18.1: Preserve multi-species habitat resources in the County of Riverside through the enforcement of the provisions of applicable MSHCPs and through implementing related Riverside County policies.

  Consistency. The project site is not within an MSHCP area.

Mitigation Measures:

MM BIO-1 **Biological Monitoring.** The Applicant will assign a Lead Biologist as the primary point of contact for the lead resource agencies regarding biological resources mitigation and compliance. For desert tortoise protection measures (BIO-6, below), the Lead Biologist may serve as the USFWS Authorized Biologist. The Applicant will provide the resume of the proposed Lead Biologist to the County, USFWS, and CDFW (as appropriate) for concurrence at least 30-days prior to onset of ground-disturbing activities. The Lead Biologist

will have demonstrated expertise with the biological resources within the Project area. In general, the duties will include, but will not be limited to those listed below:

- Regular, direct communication with representatives of County, USFWS and CDFW, and other agencies, as appropriate.
- Train and supervise additional Biological Monitors to ensure that all biological monitoring activities are completed properly and according to schedules. Monitoring will include clearance surveys of any area or activity that may impact biological resources to ensure compliance with all avoidance and minimization measures for biological resources.
- Conduct or oversee WEAP training (MM BIO-2).
- Conduct or oversee clearance surveys and monitoring duties.
- Halt any activities in any area if it is determined that the activity, if continued, would cause an unauthorized adverse impact to biological resources.
- Clearly mark sensitive biological resource areas during construction, O&M, and decommissioning, and inspect these areas at appropriate intervals for compliance with regulatory terms and conditions.
- Conduct or oversee compliance inspections during ground disturbing construction and decommissioning activities. Inspections will include delineating limits of disturbance, fence construction activities, pre-construction clearance surveys; and clearing, grubbing, and grading.
- Inspect or oversee daily inspection of active construction or O&M activity areas where animals may have become trapped. At the end of each workday, either inspect installation of structures that prevent entrapment or allow escape during periods of construction inactivity. Periodically inspect areas with high vehicle activity (e.g., parking lots) for animals in harm's way and relocate them if necessary.
- During the operations phase of the Project, provide annual reports; conduct compliance inspections (trash management, wildlife mortality logs per incident, etc.); conduct weed monitoring and control (according to the Integrated Weed Management Plan) (MM BIO-4).
- Immediately notify the Applicant, County, and resource agencies (as applicable) in writing of dead or injured special-status species, or of any non-compliance with biological mitigation measures or permit conditions.
- During construction, provide weekly verbal or written updates to County, and, for any information pertinent to state or federal permits, to the County and resource agencies.
- During construction and O&M, prepare and submit monthly and annual compliance reports, respectively.

Qualifications of Lead Biologist. The Applicant shall assign at least one Lead Biologist to the Project. The Applicant shall submit the resume and USFWS health assessment letter, if applicable, of the proposed Lead Biologist(s), with at least three references and contact information, to the County for approval in consultation with CDFW and USFWS at least

30-days prior to the start of ground disturbing activities. The Lead Biologist must meet the following minimum qualifications:

- Bachelor's degree in biological sciences, zoology, botany, ecology, or a closely related field;
- Three years of experience in field biology or current certification of a nationally recognized biological society, such as The Ecological Society of America or The Wildlife Society;
- Have at least one year of field experience with biological resources found in or near the Project area;
- In lieu of the above requirements, the resume shall demonstrate to the satisfaction of the County, in consultation with CDFW and USFWS, that the proposed Lead Biologist or alternate has the appropriate training and background to effectively implement the mitigation measures.

For the USFWS Authorized Biologist for desert tortoise, the following additional qualifications are required:

- Meet the current USFWS Authorized Biologist qualifications criteria, demonstrate familiarity with protocols and guidelines for the desert tortoise, and be approved by the USFWS;
- Possess a CESA Memorandum of Understanding pursuant to §2081(a) for desert tortoise.

Process of approving a Biological Monitor.

- The Lead Biologist or Applicant shall submit the resume, at least three references, and contact information of the proposed Biological Monitors to the County. The resume shall demonstrate, to the satisfaction of the County, the appropriate education and experience to accomplish the assigned biological resource tasks.
- Biological Monitor(s) training by the Lead Biologist shall include familiarity with the project design features, WEAP, Project permit requirements, and USFWS guidelines on desert tortoise surveys and handling procedures.

Reporting. The Lead Biologist, or during O&M, the Applicant's compliance manager, shall report regularly to the County, CDFW, and USFWS to document the status of compliance with biological mitigation measures.

During construction and decommissioning:

- Provide weekly verbal or written updates to the County with any information pertinent to the County, to resource agencies, or to state or federal permits for biological resources.
- Prepare and submit monthly and annual compliance reports to include a summary of project activities that occurred, biological resources surveys and monitoring that were performed, any sensitive or noteworthy species observed, weed infestations removed, and noncompliance issues and remedial actions that were implemented.

During O&M:

- Conduct quarterly compliance inspections and reporting, to be submitted to the County, to document the condition of exclusion fencing, wildlife mortality, and any biological resource issues of note.

MM BIO-2 **Worker Environmental Awareness Program Training.** The Lead Biologist will prepare and implement a WEAP. The Applicant will be responsible for ensuring that all workers at the site receive WEAP training prior to beginning work on the Project and throughout construction and operations. The WEAP will be available in English and Spanish. The WEAP will:

- Be developed by or in consultation with the Lead Biologist and consist of an onsite or training center presentation with supporting written material and electronic media, including photographs of protected species, available to all participants.
- Provide an explanation of the function of flagging that designates authorized work areas; specify the prohibition of soil disturbance or vehicle travel outside designated areas.
- Discuss general safety protocols such as vehicle speed limits, hazardous substance spill prevention and containment measures, and fire prevention and protection measures.
- Review mitigation and biological permit requirements.
- Explain the sensitivity of the vegetation and habitat within and adjacent to work areas, and proper identification of these resources.
- Discuss the federal and State Endangered Species Acts, Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act and the consequences of non-compliance with these acts.
- Discuss the locations and types of sensitive biological resources on the Project site and adjacent areas and explain the reasons for protecting these resources. This includes the biology and ecology of sensitive biological resources on the Project site and adjacent areas.
- Inform participants that no snakes, other reptiles, birds, bats, or any other wildlife will be harmed or harassed.
- Place special emphasis on species that may occur on the Project site including special-status plants, desert tortoise, burrowing owl, golden eagle, nesting birds, desert kit fox, American badger, and desert bighorn sheep.
- Specify guidelines for avoiding rattlesnakes and reporting rattlesnake observations to ensure worker safety and avoid killing or injuring rattlesnakes. Wherever feasible, rattle- snakes should be safely removed from the work area using appropriate snake handling equipment, including a secure storage container for transport.
- Describe workers' responsibilities regarding wildlife avoidance, prohibitions of pets and firearms, and for avoiding the introduction of invasive weeds onto the Project site and surrounding areas, describe the Integrated Weed Management Plan.
- Provide contact information for the Lead Biologist and instructions for notification of any threatened, endangered or sensitive wildlife discoveries, vehicle-wildlife collisions or dead or injured wildlife species encountered during Project-related activities.
- Include a training acknowledgment form to be signed by each worker indicating that they received training and will abide by the guidelines.
- Desert Tortoise Education Requirements: Prior to the start of construction activities, a desert tortoise education program shall be presented by the USFWS Authorized Biologist to all personnel who will be present on Project work areas. Following the start

of construction, any new employee shall be required to complete the tortoise education program prior to working on site. At a minimum, the tortoise education program shall cover the following topics:

- A detailed description of the desert tortoise, including color photographs;
- The distribution and general behavior of the desert tortoise;
- Sensitivity of the species to human activities;
- The protection the desert tortoise receives under the state and federal Endangered Species Acts, including prohibitions and penalties incurred for violation;
- The protective measures being implemented to conserve the desert tortoise during construction activities;
- Procedures and a point of contact if a desert tortoise is observed on site.

MM BIO-3 **Minimization of Vegetation and Habitat Impacts.** Prior to ground-disturbing activities, work areas (including, but not limited to, staging areas, access roads, and sites for temporary placement of construction materials and spoils) will be delineated with construction fencing (e.g., the common orange vinyl material) or staking to clearly identify the limits of work and will be verified by the Lead Biologist. No paint or permanent discoloring agents shall be applied to rocks or vegetation (to indicate surveyor construction activity limits or for any other purpose). Fencing/staking will remain in place for the duration of construction. Spoils will be stockpiled in disturbed areas. All disturbances, vehicles, and equipment will be confined to the fenced/flagged areas.

When feasible, construction activities will minimize soil and vegetation disturbance to minimize impacts to soil and root systems. Upon completion of construction activities in any given area, all unused materials, equipment, staking and flagging, and refuse shall be removed and properly disposed of, including wrapping material, cables, cords, wire, boxes, rope, broken equipment parts, twine, strapping, buckets, and metal or plastic containers. Any unused or leftover hazardous products shall be properly disposed of offsite.

Hazardous materials will be handled and spills or leaks will be promptly corrected and cleaned up, according to applicable requirements. Vehicles will be properly maintained to prevent spills or leaks. Hazardous materials, including motor oil, fuel, antifreeze, hydraulic fluid, grease, will not be allowed to enter drainage channels.

Low-Impact Site Preparation. To the extent feasible, native vegetation will be allowed to recover from rootstocks and seed bank wherever facilities do not require permanent vegetation removal. Vegetation height and density will be managed as needed for O&M and fire safety, but vegetation management will otherwise focus on maintaining habitat and soil conditions.

MM BIO-4 **Integrated Weed Management Plan.** The Applicant will prepare and implement an Integrated Weed Management Plan (IWMP) to minimize or prevent invasive weeds from infesting the site or spreading into surrounding habitat. The County must approve the plan. The IWMP will identify weed species occurring or potentially occurring in the Project area, means to prevent their introduction or spread (e.g., vehicle cleaning and inspections), monitoring methods to identify infestations, and timely implementation of manual or chemical (as appropriate) suppression and containment measures to control or eradicate invasive weeds. The IWMP will identify herbicides that may be used for control

or eradication, and avoid herbicide use in or around any environmentally sensitive areas. The IWMP will also include a reporting schedule, to be implemented by the Lead Biologist.

MM BIO-5 **Wildlife Protection.** The Applicant shall undertake the following measures during construction and O&M to avoid or minimize impacts to wildlife. Implementation of all measures shall be subject to review and approval by the County.

- *Wildlife avoidance.* Project activities will avoid interference with wildlife (include ground- dwelling species, birds, bats) by allowing animals to escape from a work site prior to disturbance; conducting pre-construction surveys and exclusion measures for certain species as specified in other measures; checking existing structures and foundations for wildlife that may be present, and safely excluding them prior to removing the structures.
- *Minimize traffic impacts.* The Applicant will specify and enforce 15 miles per hour as the maximum vehicle speed limits, to minimize risk of wildlife collisions and fugitive dust.
- *Minimize lighting impacts.* Night lighting, when in use, shall be designed, installed, and maintained to prevent side casting of light towards surrounding fish or wildlife habitat. Any FAA required safety lighting color and pattern (e.g., steady vs. flashing lighting) will be designed to minimize potential hazards (i.e., attraction and subsequent collision) to native birds and bats.
- *Avoid use of toxic substances.* Soil bonding and weighting agents used for dust suppression on unpaved surfaces shall be non-toxic to wildlife and plants.
- *Minimize noise and vibration impacts.* The Applicant will minimize noise to offsite habitat.
- *Water.* Potable and non-potable water sources such as tanks, ponds, and pipes shall be covered or otherwise secured to prevent animals (including birds) from entering. Prevention methods may include storing water within closed tanks or covering open tanks with 2-centimeter netting. Dust abatement will use the minimum amount of water on dirt roads and construction areas to meet safety and air quality standards. Water sources (e.g., hydrants, tanks, etc.) shall be checked periodically by biological monitors to ensure they do not create puddles.
- *Trash.* All trash and food-related waste shall be contained in vehicles or covered trash containers inaccessible to ravens, coyotes, or other wildlife and removed from the site regularly. Secure, wildlife proof self-closing waste bins will be used for all organic waste. To reduce the possibility of ravens or other scavengers from ripping into bags and exposing the garbage, plastic bags containing garbage will not be left out for pickup. All such waste material must be in secure waste bins or dumpsters at all times.
- *Workers.* Workers shall not feed wildlife or bring pets to the Project site. Except for law enforcement personnel, no workers or visitors to the site shall bring firearms or weapons.
- *Wildlife netting or exclusion fencing.* The existing fence surrounding the O&M structure will be updated to include desert tortoise exclusion fencing. The Applicant may install temporary or permanent netting or fencing around equipment, work areas, or Project facilities to prevent wildlife exposure to hazards such as toxic materials or vehicle strikes, or prevent birds from nesting on equipment or facilities. Bird deterrent netting will be maintained free of holes and will be deployed and secured on the equipment in

a manner that, insofar as possible, prevents wildlife from becoming trapped inside the netted area or within the excess netting. A Biological Monitor will inspect netting (if installed) twice daily, at the beginning and close of each workday. The Lead Biologist will inspect exclusion fence (if installed) weekly.

- *Wildlife entrapment.* Project-related excavations shall be secured to prevent wildlife entry and entrapment. Holes and trenches shall be backfilled, securely covered, or fenced. Excavations that cannot be fully secured shall incorporate wildlife ramp or other means to allow trapped animals to escape. At the end of each workday, a Biological Monitor shall ensure that excavations have been secured or provided with appropriate means for wildlife escape.
- *All pipes or other construction materials or supplies* will be covered or capped in storage or laydown areas. No pipes or tubing will be left open either temporarily or permanently, except during use or installation. Any construction pipe, culvert, or other hollow materials will be inspected for wildlife before it is moved, buried, or capped.
- *Dead or injured wildlife* will be reported to CDFW or the local animal control agency, as appropriate (special-status species must be reported to County, CDFW, and USFWS). The Lead Biologist shall safely move the carcass out of the road or work area if needed and dispose of the animal as directed by the agency. If an animal is entrapped, the Lead Biologist shall free the animal if feasible, or work with construction crews to free it, in compliance with safety requirements, or work with animal control or USFWS and CDFW to resolve the situation.
- *Pest control.* No anticoagulant rodenticides, such as Warfarin and related compounds (indandiones and hydroxycoumarins), may be used within the project site, on off-site project facilities and activities, or in support of any other project activities.
- *Wildlife Relocation.* If special-status species are encountered on the Project site, including, but not limited to, burrowing owl, desert kit fox, and American badger (see MM BIO-6 for desert tortoise, and MM BIO-10 for burrowing owl), all construction activities shall within stop within 250 feet (500 feet for kit fox during natal season), of the species observation until the individual(s) have left the area on their own accord. The individual(s) shall not be encouraged to leave, handled, or relocated without prior coordination with CDFW. Wildlife relocation must conform to CDFW guidelines.

MM BIO-6 **Desert Tortoise Protection.** The Applicant should consult with the CDFW and USFWS to discuss the need for an Incidental Take Permit (ITP) for impacts to desert tortoise and associated off-site habitat compensation requirements. Mitigation may be "nested" or "layered," to the extent that it meets habitat requirements for both desert tortoise and jurisdictional waters (see MM-BIO-9).

If a desert tortoise is encountered on the Project site, all construction activities shall within stop within 250 feet of the species observation until the individual(s) have left the area on their own accord. The individual(s) shall not be handled or relocated without an Incidental Take Permit (ITP) from the CDFW and USFWS. Desert tortoises shall only be handled or relocated according to a Desert Tortoise Relocation Plan, pending approval by both agencies.

Actions to Protect Desert Tortoise. The Applicant shall be responsible for implementing the following requirements to protect desert tortoise, under direction of the Lead Biologist.

- ***Desert Tortoise Exclusion Fencing.*** A temporary desert tortoise exclusion fence will be erected around work areas in accordance with the United States Fish and Wildlife Service's (USFWS) protocol. Tortoise exclusion fencing will include a "cattle guard" or desert tortoise exclusion gate at each entry point. This gate will remain closed at all times, except when vehicles are entering or leaving. If it is deemed necessary to leave the gate open for extended periods of time (e.g., during high traffic periods), the gate may be left open as long as a biological monitor is present to monitor for tortoise activity in the vicinity. Once installed, exclusion fencing will be inspected at least monthly and following all rain events, and corrective action taken if needed to maintain it.
- ***Preconstruction Clearance Survey.*** Preconstruction clearance surveys of desert tortoise exclusion fenced areas shall be conducted prior to the start of construction within the fenced area. Survey transects will be spaced 15 feet (5 meters) apart. Clearance will be considered complete after two successive 100-percent coverage surveys have been conducted without finding any desert tortoises. Clearance surveys must be conducted during the active season for desert tortoises (April through May or September through October), unless otherwise authorized by CDFW and USFWS. If a live tortoise or an occupied tortoise burrow is identified during clearance surveys, work activities will proceed only after the tortoise has either moved away of its own accord, or after if it has been relocated off-site under an ITP from USFWS and CDFW.
- ***Worker Training.*** The following specifications will be incorporated into the WEAP training, identified in Mitigation Measure BIO-2. Prior to the onset of construction activities, a desert tortoise education program will be presented by the Lead Biologist to all personnel who will be present on project work areas. Following the onset of construction, any new employee will be required to formally complete the tortoise education program prior to working on site.

  At a minimum, the tortoise education program will cover the following topics: a) A detailed description of the desert tortoise, including color photographs; b) The distribution and general behavior of the desert tortoise; c) Sensitivity of the species to human activities; d) The protection the desert tortoise receives under the state and federal Endangered Species Acts, including prohibitions and penalties incurred for violation; e) The protective measures being implemented to conserve the desert tortoise during construction activities; and f) Procedures and a point of contact if a desert tortoise is observed on site.
- ***Tortoise Observations.*** Any time a tortoise is observed within or near a work site, all construction activities shall within stop within 250 feet of the species observation until the tortoise has either moved away of its own accord, or after it has been relocated off-site under an ITP from USFWS and CDFW. Any potentially occupied burrows will be avoided until monitoring or field observations determines absence, or until other action is authorized by USFWS and CDFW.
- ***Unfenced work areas.*** As an alternative to exclusion fencing, any work conducted in an area that is not fenced to exclude desert tortoises (e.g., SCE tie-in and SoCal Gas stub pipeline sites) must be monitored by a biological monitor who will stop work if a tortoise enters the work area. Work sites with potential hazards to desert tortoise (e.g., auger holes, steep-sided depressions) that are outside of the desert tortoise exclusion fencing will not be left unfilled or uncovered overnight.
- ***Operation phase tortoise monitoring or exclusion.*** At the Applicant's discretion, and in consultation with resource agencies, permanent desert tortoise exclusion fencing may

be installed around the Project facility site, or the Applicant may prepare and implement a monitoring and avoidance program to ensure no take of desert tortoise during O&M, while allowing wildlife (possibly including desert tortoise) to move through the facilities uninjured.

- ***Tortoises under vehicles.*** The ground beneath vehicles parked outside of desert tortoise exclusion fencing will be inspected immediately prior to the vehicle being moved. If a tortoise is found beneath a vehicle, the vehicle will not be moved until the desert tortoise leaves of its own accord.
- ***Tortoises on roads.*** If a tortoise is observed on or near the road accessing a work area, vehicles will stop to allow the tortoise to move off the road on its own.
- ***Dead or Injured Specimens.*** Upon locating a dead or injured tortoise, the Applicant or its agent will immediately notify the CDFW and USFWS by email. Written notification must be made within five days of the finding, both to the appropriate USFWS field office and to the USFWS's Division of Law Enforcement. The information provided must include the date and time of the finding or incident (if known), location of the carcass or injured animal, a photograph, cause of death, if known, and other pertinent information.
- ***Raven Management Plan.*** The Applicant will develop and implement a Raven Management Plan to address activities that may occur during the pre-construction, construction, O&M, and decommissioning phases of the project that may attract common ravens (Corvus corax), a nuisance species that is a subsidized predator of desert tortoises and other sensitive species in the project vicinity. The measures contained in the Raven Management Plan will be designed to:
  - Identify conditions associated with the project that might provide raven subsidies or attractants.
  - Describe management practices to avoid or minimize conditions that might increase raven numbers and predatory activities.
  - Describe monitoring during construction and operations, including methods to identify individual ravens that prey on desert tortoises.

MM BIO-7 **Bird and Bat Protection.** During construction, the Applicant will prepare and implement a Nesting Bird Management Plan (NBMP), to include nest surveys, avoidance, and protection. The project will either avoid vegetation clearing during the nesting season, or conduct pre-construction nest surveys of potential habitat and implement no-disturbance buffer areas around active nests.

Pre-construction surveys for active nests will be conducted by one or more Biological Monitors at the direction of the Lead Biologist. The biologists' qualifications will be subject to review and approval by the County, CDFW, and USFWS. Nest surveys will be conducted for all project activities throughout the nesting season, identified here as beginning January 1 for raptors and hummingbirds and February 1 for other species, and continuing through August 15. Nest surveys will be completed at each work site no more than 7 days prior to initiation of site preparation or construction activities. Nest surveys will cover all work sites, including the solar facility, green hydrogen facility, and SCE tie-in and SoCal Gas stub pipeline, and surrounding buffer areas of 1,200 feet for raptors and 250 feet for other species. If adjacent properties are not accessible to the biological monitors, the off-site nest surveys may be conducted with binoculars.

At each active nest, the biological monitor will establish and mark a buffer area surrounding the nest where construction activities that could disrupt nesting behavior will be excluded. The Applicant may propose species-specific buffer distances or variable distances, depending on activity levels (e.g., driving past the nest to access work sites may be less disruptive than foundation construction). Alternately, buffer distances will be 1,200 feet for raptor nests and 250 feet for other species. The extent of nest protection will be based on proposed construction activities, species, human activities already underway when the nest is initiated (e.g., a house finch nest built in the eaves of an occupied structure would warrant less avoidance or protection than a loggerhead shrike nest build in native shrubland), topography, vegetation cover, and other factors. The avoidance and protection measures will remain in effect until the nest is no longer active. If for any reason a bird nest must be removed during the nesting season, the Applicant or its agent will notify the County, CDFW, and USFWS and retain written documentation of the correspondence. Nests will be removed only if they are inactive, or if an active nest presents a hazard.

During O&M, the Applicant shall implement adaptive management measures developed for the neighboring Oberon, Arica, and Victory Pass Projects, based on the results of post-construction bird and bat monitoring at those Project sites. Alternately, the Applicant may implement post-construction monitoring for two years in accordance with the Bird and Bat Conservation Strategy (BBCS) plans developed for the neighboring Oberon, Arica, and Victory Pass Projects.

MM BIO-8 **Revegetation.** The Applicant will prepare and implement a Revegetation Plan for all temporarily disturbed areas, to be reviewed and approved by County, USFWS, and CDFW. The Revegetation Plan will address revegetation of disturbed areas and ongoing O&M management of native vegetation within the solar fields. The Plan will specify success criteria and materials and methods for site preparation, reseeding, maintaining, and monitoring revegetated areas.

Cactus Salvage. The Revegetation Plan will include salvaged or nursery stock yuccas (all species), and cacti (excluding cholla species, genus *Cylindropuntia*). The Plan will include methods to salvage and replant cacti and yucca found on the site; season for salvaging the plants; methods for salvage, storage, and re-planting them; locations for re-planting; and appropriate monitoring and success criteria for the salvage work.

Operations Phase On-Site Vegetation Management. The Plan will include methods and scheduling for on-site vegetation management throughout the operations phase, describing mowing or other vegetation treatments to be implemented, to minimize interference with the solar panels, fire hazard, soil disturbance, and disturbance of any bird nests. It also will address disposal of mowed material, and incorporate all applicable components of the Integrated Weed Management Plan, including any proposed herbicide usage.

MM BIO-9 **Streambed and Watershed Protection.** Prior to ground-disturbing activities in jurisdictional waters of the State, the Applicant will obtain a Streambed Alteration Agreement from the CDFW and Waste Discharge Requirements from the RWQCB. Both agencies may specify permit conditions beyond the mitigation measures and habitat compensation identified here.

BMPs. Existing ephemeral drainages would be impacted across the Project site, however, the Applicant will implement Best Management Practices (BMPs) identified below, where

feasible, to minimize adverse impacts and to avoid impacts to off-site streambeds and watersheds.

- Vehicles and equipment will not be operated in ponded or flowing water except as specified by resource agencies and Project permits.
- The Applicant will minimize road building, construction activities, and vegetation clearing within ephemeral drainages, where feasible.
- The Applicant will prevent water containing mud, silt, or other pollutants from grading or other activities from entering off-site drainages or being placed in locations that may be subjected to high storm flows.
- Spoil sites will not be located within 30 feet from the boundaries of off-site drainages or in locations that may be subjected to high storm flows, where spoils might be washed back into drainages.
- Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to vegetation or wildlife resources, resulting from Project-related activities, will be prevented from contaminating the soil and/or entering ephemeral drainages. The Applicant shall ensure that safety precautions specified by this measure, as well as all other safety requirements of other measures and permit conditions are followed during all phases of the project.
- When operations are completed, any excess materials or debris will be removed from the work area. No rubbish will be deposited within 150 feet of the high-water mark of any off-site drainage during construction, operation, and decommissioning the project.
- No equipment maintenance will occur within 150 feet of any off-site Category 3, 4, or 5 streambed or any streambed greater than 10 feet wide and no petroleum products or other pollutants from the equipment will be allowed to enter any off-site state jurisdictional waters under any flow.
- With the exception of the drainage control system installed for the project, the installation of bridges, culverts, or other structures will be such that water flow (velocity and low flow channel width) is not impaired. Bottoms of temporary culverts will be placed at or below stream channel grade.
- No broken concrete, debris, soil, silt, sand, bark, slash, sawdust, rubbish, or other organic or earthen material from any construction or associated activity of whatever nature will be allowed to enter into, or be placed where it may be washed by rainfall or runoff into, off-site state jurisdictional waters.
- Stationary equipment such as motors, pumps, generators, and welders located within or adjacent to a drainage will be positioned over drip pans. Stationary heavy equipment will have suitable containment to handle a catastrophic spill/leak. Clean up equipment such as brooms, absorbent pads, and skimmers will be on site prior to the start of construction.
- The cleanup of all spills will begin immediately. The County, CDFW, and RWQCB will be notified immediately by the Applicant of any spills and will be consulted regarding clean-up procedures.

Habitat Compensation. The Applicant will acquire and protect, in perpetuity, compensation habitat to offset impacts to jurisdictional waters. Mitigation may be “nested” or

"layered" with desert tortoise and/or burrowing owl, if needed (see MM BIO-6 and MM BIO-10), to the extent that it meets habitat requirements for multiple species or sensitive biological resources that will or may be impacted by the Project (e.g., jurisdictional state waters, burrowing owl, and desert tortoise).

The acreages will be based upon final calculation of impacted acreage. Acreages will be adjusted as appropriate for future modifications during implementation. Compensation will be determined in coordination with CDFW and RWQCB per agency permits.

Criteria for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands will include the following: provide habitat value that is comparable to the habitat impacted, taking into consideration soils, vegetation, topography, human-related disturbance, invasive species, wildlife movement opportunity, proximity to other protected lands, management feasibility, and other habitat values.

Compensation activities must be initiated or completed within 12 months from the time the resource impact occurs. A 6-month extension may be authorized, subject to approval by the authorizing officer, dependent on the resources impacted and compensation due diligence of the project developer. Prior to initiation of construction activities, the Applicant or an approved third party will submit to the County, CDFW, and USFWS for review and approval a Compensation Plan identifying the proposed compensation option(s), including the proposed compensation lands, and specifying the land ownership, conservation easement terms, long-term management, and responsibility for funding or endowment. The Plan shall include a schedule for initiating and completing compensation within the agreed upon timeframe. The Compensation Plan will be submitted for review and approval to the County, CDFW, and USFWS. Alternatively, the Applicant may purchase credits from an agency-approved mitigation bank.

MM BIO-10 **Burrowing Owl Protection.** The Applicant will consult with the CDFW to discuss the need for an Incidental Take Permit (ITP) for potential impacts to and take of western burrowing owl. The Applicant shall prepare and implement a Burrowing Owl Avoidance and Mitigation Plan that describes methods to avoid, minimize, and mitigate potential impacts to burrowing owl. The plan shall include pre-construction surveys, protection of owls occupying the site, passive relocation, and associated compensation requirements to fully mitigate any incidental take consistent with guidelines in the Staff Report on Burrowing Owl Mitigation (CDFG 2012) or more recent. Mitigation may be "nested" or "layered," to the extent that it meets habitat requirements for both desert tortoise and jurisdictional waters (see MM BIO-6 and BIO-9). The plan will be submitted to the County and CDFW, as appropriate, for review and approval.

5.5. Cultural Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
8. Historic Resources				
a) Alter or destroy a historic site?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐

Source(s): On-site Inspection, Project Application Materials, Appendix D, Phase I Cultural Resources Assessment for Skybridge Solar Farm & Green Hydrogen Project (PaleoWest 2022).

Findings of Fact:

a-b) *Construction, O&M, and Decommissioning.* To address the Project's potential to impact historical resources, a Phase I Cultural Resources Assessment was prepared by PaleoWest, LLC (PaleoWest), included as Appendix D. The study included a review of existing data acquired as recently as December 2020 for the surrounding projects, including Palen Solar Project, Desert Harvest Solar Farm Project, Desert Sunlight Solar Farm Project, Devers to Palo Verde, Athos Renewable Energy Project, and Arica and Victory Pass Solar Projects and a supplemental record search requested for the Eastern Information Center (EIC). The review of previous data and EIC record search was conducted for the Project site and surrounding 0.5-mile buffer. PaleoWest staff examined additional sources during the cultural resource literature review and records search, including the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the Office of Historic Preservation (OHP) Archaeological Determinations of Eligibility, the OHP Directory of Properties in the Historic Property Data File, historical aerial images and topographic maps, and BLM GLO land patents and survey plats.

Additionally, an intensive pedestrian field survey of the Project site was conducted by PaleoWest on December 20-21, 2021 (Appendix D). Two PaleoWest archaeologists utilized Riverside County standards, consisting of parallel pedestrian transects spaced at 10 to 15 meters intervals when allowed by terrain and vegetation.

The records search results indicate that 12 cultural resources have been recorded previously within the Project site and 0.5-mile buffer. These resources include three historic-period archaeological sites, one

prehistoric-period archaeological site, three prehistoric-period isolated artifacts, three historic-period isolated artifacts, and two historic period built-environment resources. One of these previously recorded cultural resources is mapped within the Project site. The resource consists of one historic-period built-environment resource (P-33-024144), known as Kaiser Road. Kaiser Road was previously determined to not be eligible to the CRHR in 2011. PaleoWest revisited the segment of Kaiser Road that falls within the Project site and found the road to be in the same condition as recorded in 2011 and agreed with the previous determination of not eligible for the CRHR (Appendix D).

During the survey effort, PaleoWest also documented secondary deposits of historic-period artifacts mixed with modern refuse distributed across much of the Project site (Appendix D). These resources are considered isolates and because these isolates have been redistributed from their primary locations, they retain little more than generalized temporal information and thus were recommended not eligible for the CRHR.

No CRHR listed or eligible resources are located within the Project site. However, previously unknown buried resources could be uncovered, damaged, or destroyed during decommissioning or construction-related ground-disturbing activity, which would be considered a potentially significant impact. Imple-

mentation of Mitigation Measures CUL-1 and CUL-2 would reduce such potential impacts to unknown historical resources to a less than significant level.

Mitigation:

MM CUL-1 **Retain a Project Archaeologist.** Prior to issuance of grading permits, the applicant/ developer shall provide evidence (executed contract) to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to develop and implement the project Cultural Resource Monitoring Program.

Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off- site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.

MM CUL-2 **Cultural Resource Monitoring Program.** Prior to issuance of grading permits, a CRMP shall be developed by the Project Archaeologist (see MM CUL-1) that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant, as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A copy of the CRMP shall be provided to the County Archaeologist to ensure compliance with this mitigation measure.

The CRMP shall contain at a minimum the following:

- ***Archaeological Monitor*** – An adequate number of qualified Archaeological Monitors shall be onsite to ensure all earth moving activities are being monitored. This includes all grubbing, grading and trenching onsite and for all offsite improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined and directed by the Project Archaeologist.
- ***Cultural Sensitivity Training*** – The Project Archaeologist, or qualified Archaeological Monitor working under the direction of the Project Archaeologist, shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; the areas to be avoided during grading activities; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training, and all construction personnel must attend prior to beginning work on the project site. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.
- ***Unanticipated Resources*** – In the event that previously unidentified potentially significant cultural resources are discovered, the Archaeological Monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Project Archaeologist shall determine the significance of the discovered resources. The County Archaeologist must concur with the evaluation before construction activities will be

allowed to resume in the affected area. Further, before construction activities are allowed to resume in the affected area, the artifacts shall be recovered, and features recorded using professional archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits shall be minimally documented in the field and the monitored grading can proceed.

- ***Artifact Disposition*** – The landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.

The Project Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for monitoring.

Monitoring: A County certified professional archaeologist shall prepare a CRMP and implement the CRMP during construction, including WEAP training of all supervisors and crew prior to the start of construction.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
9. Archaeological Resources				
a) Alter or destroy an archaeological site?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Source(s): On-Site Inspection, Project Application Materials, Appendix D, Phase I Cultural Resources Assessment for Skybridge Solar Farm & Green Hydrogen Project.

Findings of Fact:

a-b) *Construction, O&M, and Decommissioning*. PaleoWest conducted a literature review and records search which indicated that 12 cultural resources have been recorded previously within the Project site and 0.5-mile buffer (see Appendix D). These resources include three historic-period archaeological sites, one prehistoric-period archaeological site, three prehistoric-period isolated artifacts, three historic-period isolated artifacts, and two historic period built-environment resources. Additionally, an intensive pedestrian field survey of the Project site was conducted by PaleoWest on December 20-21, 2021. Two PaleoWest archaeologists utilized Riverside County standards, consisting of parallel pedestrian transects spaced at 10 to 15 meters intervals when allowed by terrain and vegetation. No unique archaeological resources were identified through either the record search or survey. See Section 5.5 above regarding historic resources, and Appendix D.

No CRHR-listed or eligible resources or unique archaeological resources are located within the Project site. However, previously unknown buried resources could be uncovered, damaged, or destroyed during construction-related ground disturbing activity, which would be considered a potential significant impact. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce potential impacts to unknown archaeological resources to a less than significant level.

c) *Construction, O&M, and Decommissioning*. No formal or informal cemeteries or burial grounds were identified in the cultural resources records search or during the intensive pedestrian survey. However, there is always a possibility of encountering unknown buried remains during Project-related ground

disturbing activities, during construction or decommissioning. In the unlikely event human remains are discovered, compliance with State Law Health and Safety Code § 7050.5 would be required. These requirements state that no further excavations or disturbance of the site shall occur until the County Coroner has made the necessary findings as to its origin. Further, pursuant to Public Resources Code § 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to their treatment and disposition has been made. With the implementation of existing State regulations, potential impacts to human remains would be less than significant.

Mitigation:

MM CUL-1: Retain a Project Archaeologist. (full text above).

MM CUL-2: Cultural Resources Monitoring Program (CRMP). (full text above)

Monitoring: A County certified professional archaeologist shall prepare a CRMP and implement the CRMP during construction, including WEAP training of all supervisors and crew prior to the start of construction.

5.6. Energy

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
10. Energy Impacts				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Source(s): Riverside County General Plan Land Use Element (Riverside County 2021), Project Application Materials

Findings of Fact:

a) *Construction and Decommissioning*. The Project is a renewable energy project and is located outside of Desert Center. The Project is in an area of high solar insolation potential, adjacent to other renewable energy projects. The Project electrolyzers will be powered by both the on-site solar facility and by purchasing additional power from external renewable energy generators, delivered to the site by the SCE distribution line. Project construction is anticipated to last approximately 9 months, with approximately 10 employees. During construction, motorized equipment and vehicles would consume energy resources in the form of fossil fuels (i.e., diesel fuel and gasoline). Additionally, construction would require the manufacture and delivery of new equipment and materials, which would also require energy use.

Although construction activities would consume fossil fuels, consumption of these resources would be temporary and would cease upon the completion of construction. To ensure that activity levels are not wasteful, implementation of SCAQMD regulatory requirements, requires the Project to minimize unnecessary use of construction equipment; for example, by requiring equipment to be properly maintained and limiting construction equipment idling. The equipment used would meet California standards for fuel efficiency Impacts during decommissioning would be similar to construction. Based on these considerations, construction and decommissioning of the Project would not result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. Construction and decommissioning impacts would be less than significant.

O&M. Once operational the Project will produce usable hydrogen, which will either be directly injected into the adjacent, existing SoCal Gas natural gas pipeline or stored on site for transport to market by hydrogen powered tractor trailers for use in both light and heavy-duty transportation vehicles. The process of capturing hydrogen using electrolyzers would consume energy, 50 MW of which will be generated on-site with solar technology; the remainder of the electricity used by the Project would be provided by SCE. In the future, the Project could expand to 500 MW of electrolyzers, and additional power would be purchased from SCE, which is expected to come from off-site renewable generators. The electrolyzers would be properly maintained to ensure that they are producing hydrogen efficiently. Any production of electricity and hydrogen from renewable resources facilitate displacement of conventional carbon-based fuels that would otherwise be used to meet vehicle fueling and electricity demand. The Project would require up to 10 staff for operation and maintenance activities. The transportation of workers to the site and export of hydrogen would consume energy. It is expected that there will be up to 20 one-way trips a day for the workers, and up to 30 additional trips for the export of hydrogen. However, the hydrogen would be transported to market by hydrogen powered tractor trailers where the hydrogen would be used in both light and heavy-duty transportation vehicles. The use of green hydrogen to fuel light and heavy-duty transportation vehicles would facilitate the transition of the transportation sector away from the use of fossil fuels, and this benefit would outweigh the impact of conventional fuels used by the worker vehicle trips. The Project operation would not result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. O&M impacts would be less than significant.

b) *Construction, O&M, and Decommissioning*. There are several state laws, regulations and policies related to promoting renewable energy and energy efficiency. To transition away from fossil fuels in the transportation sector and in the production of electricity, various federal and California programs incentivize production of low-carbon transportation fuels and the generation of electricity by renewable resources. The federal programs include the Renewable Fuel Standard (promulgated 2007 and 2010) and fuel efficiency standards for vehicles. California's Assembly Bill 32, passed in 2006, is the first program in the U.S. to take a long-term approach to address climate change, by implementing a required reduction of greenhouse gas emissions to a level 80 percent below 1990 levels by 2050 (CARB, 2018). Senate Bill (SB) 100 was passed in 2018, which accelerates California's renewable portfolio standard requirements of electricity utility providers to 50 percent renewable energy sources by 2025, 60 percent by 2030, and will require that the next 40 percent comes from zero-carbon sources of electricity by 2045 (CEC 2021). SB 350, also known as the Clean Energy and Pollution Reduction Act, establishes clean energy, clean air, and greenhouse gas reduction goals, including reducing greenhouse gas to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050. Additionally, SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This objective will increase the use of RPS eligible resources, including solar, wind, biomass, geothermal, and others in the electricity supply (CEC 2020). An important component of California's plans for responding to climate change is the Low Carbon Fuel Standard (LCFS) to reduce the carbon intensity of transportation fuels. By increasing the supply of green hydrogen, this Project would facilitate the use of renewable resources in the transportation sector.

The Project would not conflict with or obstruct any state or local plans for renewable energy. The Project helps meet the federal and state goals to reduce use of fossil fuels. Therefore, the Project would cause no environmental impact related to renewable energy or energy efficiency plans.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.7. Geology and Soils

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones				
a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☐	☒

Source(s): Riverside County General Plan Chapter 6 Safety Element (Riverside County 2021a), California Geological Survey Earthquake Zones of Required Investigation (CGS 2023), United States Geological Survey U.S. Quaternary Faults and National Seismic Hazard Model 2023 Fault Sources, United States Geological Survey 2008 National Seismic Hazard Ma–s - Source Parameters (USGS 2023a and 2023b).

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. The Project is not located within or across a currently delineated Alquist-Priolo Earthquake Fault Zone, nor is it crossed by or adjacent to any known active faults (CGS 2023; USGS 2023a). The closest mapped faults to the Project considered as potential seismic sources by the United States Geological Survey (USGS) 2023 National Seismic Hazard Model (NSHM) are the Blue Cut fault, approximately 7 miles to the north of the Project, and the San Andreas Fault Zone, located approximately 35 miles to the west of the Project (USGS 2023a and b). Therefore, there would be no impacts from surface fault rupture as result of Project construction, O&M, or decommissioning.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
12. Liquefaction Potential Zone				
a) Be subject to seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

Source(s): Riverside County General Plan, Desert Center Area Plan Figure 10 (Riverside County 2021b), California Geological Survey Earthquake zones of Required Investigation, Appendix E, Sladden Engineering Geotechnical Investigation

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. Liquefaction is the phenomenon in which saturated granular sediments temporarily lose their shear strength during periods of earthquake-induced strong ground shaking, causing the soil to behave as a fluid mass. In general, for the effects of liquefaction to occur at the surface, groundwater levels must be within 50 feet of the ground surface and the soils within the saturated zone must also be susceptible to liquefaction (consist of unconsolidated granular deposits). The Desert Center Area Plan maps the Project site and surrounding area as having liquefaction susceptibility (County of Riverside 2021b). The Project site has not been evaluated for liquefaction hazards by the CGS (CGS 2023). The geotechnical investigation conducted for the Project site (Appendix E) indicates that the soils underlying the site are primarily dense to very dense sand and silty sand. Groundwater was not encountered to the full depth, 31 feet below ground surface (bgs), of borings conducted for the

investigation, and the geotechnical report indicates that based on CDWR information that groundwater is expected to be greater than 50 feet bgs (Appendix E). The geotechnical report indicates that the potential for liquefaction to occur in the Project site should therefore be considered negligible. Design of project components in accordance with federal, State, and local building codes, regulations, and guidelines would reduce seismic impacts in the unlikely event liquefaction were to occur at the Project site. Impact related to liquefaction would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
13. Ground-shaking Zone				
a) Be subject to strong seismic ground shaking?	☐	☐	☒	☐

Source(s): Desert Sunlight Solar Farm Project California Desert Conservation Area Plan Amendment and Final Environmental Impact Statement, Appendix E, Sladden Engineering Geotechnical Investigation

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. The Project site and surrounding area has historically been subject to seismically induced ground shaking with approximately 32 earthquakes of magnitude 5.5 or greater having occurred within 70 miles of the Project site since 1800 (BLM 2011). Significant historic earthquakes in the region include the magnitude (M) 6.0 1948 Desert Hot Springs earthquake and the M6.1 1992 Joshua Tree earthquake (an aftershock of the Landers earthquake) (BLM 2011). Strong ground shaking from local and regional faults is expected to occur within the design life of the Project (Appendix E). Implementation of geotechnical design recommendations, and design of project components in compliance with all federal, State, and local building codes, regulations, and guidelines would reduce impacts in from seismically induced ground shaking if it were to occur at the Project site during the lifetime of the Project. Impact related to seismically induced ground shaking would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
14. Landslide Risk				
a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?	☐	☐	☐	☒

Source(s): Application Materials, Appendix E, Sladden Engineering Geotechnical Investigation (Sladden 2022), Riverside County Desert Center Area Plan Figure 11 (Riverside County 2021b)

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. The Project site is located with a relatively flat to gently sloping alluvial valley with no areas of steep slopes within or immediately adjacent to the Project. It is not mapped within an area of County designated landslide susceptibility (Riverside County 2021b). The

potential for seismically induced or Project construction triggered slope failures is negligible. There is no potential for impacts from landslides or slope instability.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
15. Ground Subsidence				
a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?	☐	☐	☐	☒

Source(s): Riverside County Map My County Subsidence layer (Riverside county 2023), United States Geological Survey Land subsidence in California (USGS 2023c)

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. Subsidence refers to the sudden sinking or gradual downward settling and compaction of soil and other surface material with little or no horizontal motion. It may be caused by a variety of human and natural activities, including earthquakes and water extraction. The main cause of subsidence in California is groundwater pumping. The effects of subsidence include damage to buildings and infrastructure, increased flood risk in low-lying areas, and lasting damage to groundwater aquifers and aquatic ecosystems. Land subsidence can occur in valleys containing aquifer systems that are, in part, made up of fine-grained sediments and that have undergone extensive groundwater development. Although subsidence has been documented in portions of Riverside County in the Coachella Valley and in the Elsinore Trough and portions of eastern Riverside County are mapped by the County of Riverside as being susceptible to subsidence, no ground subsidence has been mapped

within the Chuckwalla Valley area (County of Riverside 2023; USGS 2023c). Therefore, there would be no impact due to subsidence of unstable geologic units.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
16. Other Geologic Hazards				
a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	☐	☐	☐	☒

Source(s): Riverside County General Plan Chapter 6 Safety Element, Riverside County General Plan Desert Center Area Plan, Appendix E, Sladden Engineering Geotechnical Investigation (Sladden 2022)

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. A seiche is a temporary disturbance or oscillation in the water level of a lake or partially enclosed body of water caused by changes in atmospheric pressure or seismic shaking. The Project site is not located near to any active or potentially active volcanos nor to any large bodies of water and would therefore not be susceptible to volcanic hazards or seiche (Appendix E). The Project site is not located on significant slopes underlain by soils with high clay content and would

therefore be unlikely to experience mudflows in the event of high rainfall events. Therefore, there would be no impacts related to seiche, volcanic hazards, or mudflows due to the Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
17. Slopes				
a) Change topography or ground surface relief features?	☐	☐	☐	☒
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	☐	☐	☐	☒
c) Result in grading that affects or negates subsurface sewage disposal systems?	☐	☐	☐	☒

Source(s): Project Application Materials, Appendix E, Sladden Engineering Geotechnical Investigation (Sladden 2022)

Findings of Fact:

a-b) *Construction, O&M, and Decommissioning*. The Project site is relatively flat to gently sloping and no mass grading would occur for the Project. Limited grading and excavation would occur for building and equipment foundations within the hydrogen facility, buried electrical collection lines, and access roads. Only mowing and grubbing would occur in the solar array areas. There are no areas of the site with highly irregular topography that provides important hydrologic functions to the site. Therefore, no significant changes in topography are anticipated and no cut or fill slopes of greater than 2:1 relief or greater than 10 feet high are planned. There would be no impacts.

c) *Construction, O&M, and Decommissioning*. No existing structures with sewage disposal systems are currently located on the Project site; therefore, the limited project grading would not effect existing sewage disposal systems. The Project will include restrooms and an associated sanitary sewage disposal system that would be constructed following County of Riverside septic system permit and design guidelines. Therefor Project grading would not impact subsurface septic/sewage disposal systems.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
18. Soils				
a) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

Source(s): Natural Resources Conservation Service Official Soil Series Descriptions (NRCS 2023), Project Application Materials, Appendix E, Sladden Engineering Geotechnical Investigation (Sladden 2022)

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. No mass grading would occur for the Project. Ground disturbing activities would include mowing and grubbing in the solar array areas and limited grading and excavation for building and equipment foundations within the hydrogen facility, buried electrical collection lines, and access roads. The soils in the Project site are primarily granular in nature consisting of gravelly and sandy loams overlying sandy alluvium (NRCS 2023; Appendix E) and may be subject to erosion when disturbed. Best management practices identified in the SWPPP that would be prepared for the Project would reduce potential impacts related to erosion during construction activities and throughout the life of the facility to less than significant.

b) *Construction, O&M, and Decommissioning*. The soils in the Project site are primarily granular in nature consisting of gravelly and sandy loams overlying sandy alluvium (NRCS 2023; Appendix E). Laboratory testing of the surface soil on the Project site conducted as part of the geotechnical investigation indicate that they have a very low expansion potential (Appendix E). Therefore, the potential for expansive soils at the Project site is negligible.

c) *Construction, O&M, and Decommissioning*. Soils underlying the Project site are granular in character and consist primarily of alluvial sand and silty sand (Appendix E). The Project will include construction of a septic system to dispose of sanitary wastewater. The Project will comply with County of Riverside Septic System permit and design requirements for septic systems or alternative wastewater treatment systems. Therefore, there would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
19. Wind Erosion and Blowsand from project either on or off site				
a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?	☐	☐	☒	☐

Source(s): Appendix E, Sladden Engineering Geotechnical Investigation (Sladden 2022), BLM Desert Sunlight Solar Farm Project California Desert Conservation Area Plan Amendment and Final Environmental Impact Statement, (Lancaster 2014)

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. The Chuckwalla Valley is a region of active aeolian sand migration and deposition. Aeolian processes play a major role in the creation and establishment of sand dune formations and habitat in the Chuckwalla Valley. There are no active sand dunes within the Project site; however, there are active dunes in the general vicinity, located almost 2 miles east of the Project site. According to mapping of eolian sources by Lancaster (2014), the Project site is underlain by active eolian sources consisting of young alluvial fan deposits of latest Pleistocene and Holocene age consisting of sand and gravel with local active washes serving as sources for aeolian sediment. Very minor relict, old, or inactive dune aeolian sand deposits may exist within the site associated with mobilized sand from the local washes in the areas surrounding the Project site.

No active surface aeolian (wind-driven) sand deposits (dunes or sand sheets) are present within the Project site; however, fluvial sand transport across the site likely carries sand from the young alluvial fan deposits (mapped as an active eolian source) downslope toward Big Wash and Pinto Wash, where fine sands may be taken up into the aeolian sand transport system toward the Palen Dunes. Due to the paucity of active aeolian deposits, the potential is low for aeolian or wind-driven sand erosion in the Project site.

Best management practices identified in the SWPPP that would be prepared for the Project would reduce potential impacts related to erosion during construction activities and throughout the life of the facility to less than significant. Impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.8. Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
20. Greenhouse Gas Emissions				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Source(s): Riverside County General Plan (Riverside County 2018), Riverside County Climate Action Plan ("CAP") (Riverside County 2019), Project Application Materials

Findings of Fact:

a) *Construction and Decommissioning.* Construction of the Project would result in GHG emissions from the use of off-road construction equipment, worker vehicles, mobilizing construction equipment, crew, and materials. These activities would cause GHG emissions due to fuel combustion by construction vehicles and off-road equipment. Different sources of GHG emissions include diesel powered off-road equipment, gasoline powered construction vehicles which include trucks and autos for moving crews, equipment, materials, and water or fuels delivery. The equipment and vehicles would emit CO_2, CH_4, and N_2O as products of fuel use and combustion. Emissions during decommissioning would be similar to construction emissions.

O&M. During operations, the electrolyzers used do not emit GHGs. An onsite well will provide water for use in the electrolyzers, although the water will need to be treated at an onsite water treatment plant to demineralize prior to entering the electrolyzer. This process, as well as worker vehicle trips to the site and any pumping of water can emit GHG emissions. After production, hydrogen gas will either be injected into adjacent, existing SoCal Gas natural gas pipeline or will be trucked offsite using trucks that run on hydrogen fuel and thus only emit water.

Annual GHG emissions include construction emissions amortized over 30 years added to yearly operational emissions. The resulting yearly emissions in MT CO_2e is compared to a threshold of 10,000 MT CO_2e/year as recommended by the SCAQMD Interim CEQA GHG significance criteria for stationary sources. Annual amortized construction and operational emissions are 408.5 MTCO_2e/year (Appendix A).

Emissions Avoided by Producing Electricity and Hydrogen. The Project would produce 50 megawatts (MW) initially of solar energy, which at full buildout could store up to 35,000 kg of liquid or compressed hydrogen. Over time the hydrogen electrolyzer capacity could increase to 500 MW with no additional site disturbance needed. This would avoid more emissions than it would use to increase operations, and the overall GHG emissions avoided by the project would be much higher.

Any production of electricity and hydrogen from renewable resources would facilitate displacement of conventional carbon-based fuels that would otherwise be used to meet vehicle fueling and electricity

demand. The power displaced is incremental power provided by generators elsewhere on the grid, typically from natural gas power plants. As mentioned earlier in this section, the vehicles that could be used to transport liquid hydrogen will be powered by hydrogen. In addition, hydrogen produced from the Project can be used to fuel other hydrogen vehicles. Presently, the transportation sector is responsible for 38% of GHG emissions in California (CARB 2022). The displacement of carbon-based fuels means that the project would avoid GHG that would be emitted elsewhere on the grid or avoid use of traditional internal combustion engines vehicles that burn fossil fuels. The quantity of avoided GHG could vary over time depending on California's statewide progress in reducing GHG in the electricity supply, by increasing its Renewable Portfolio Standard.

There would be a net GHG reduction due to this Project from the direct and indirect effects on emissions from the construction and operations phases. The overall quantities of GHG generated by the Project would not have a significant impact on the environment because the SCAQMD threshold level would not be exceeded and the impact associated with GHG emissions would be less than significant.

b) *Construction, O&M, and Decommissioning*. Riverside County's Climate Action Plan (CAP) is a qualified GHG reduction plan according to CEQA guidelines and has established a 3,000 MT CO2e threshold (Riverside County 2019). The Project would not exceed the threshold established by the CAP and would not conflict with any of the GHG reduction measures or goals within the CAP, and thus, is consistent with the plan. In addition, the Project would not inhibit the County from implementing any of the measures in the plan, both that apply to the Project and do not apply to the Project. Therefore, the impacts would be less than significant.

The Riverside County General Plan's Air Quality Element Policy AQ 20.13 is relevant to the project and reduces water use and wastewater generation for both new and existing sources, including industrial sources (Riverside County 2018). The 2008 baseline GHG emissions inventory for Riverside County included 152,473 MT CO_2e from purchased water and wastewater treatment (Riverside County, 2019). The Proposed Project is estimated to generate 4.74 MT CO_2e from water usage, including the water used for hydrolysis, as well as all other water usage such as watering for dust mitigation (Appendix A). Impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.9. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
21. Hazards and Hazardous Materials				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	☐	☒	☐	☐

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	☐	☐	☐	☒
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

Source(s): Project Application Materials, Google Earth (2023), California State Water Resources Control Board GeoTracker (SWRCB 2023), US Department of Toxic Substances Control (DTSC 2023).

Findings of Fact:

a-b) *Construction, O&M, and Decommissioning*. The Project would require the use of hazardous materials such as fuels, lubricants, and cleaning solvents during construction, operation, and decommissioning of the Project. Hazards to the public or environment may be caused by the transport, use or disposal of hazardous materials or by accidental spills or release of hazardous materials. Vehicles would be serviced at off-site facilities but may be refueled on site. No extremely hazardous substances (i.e., those governed pursuant to Title 40, Part 335 of the Code of Federal Regulations) are anticipated to be used, stored, transported, or disposed of as a result of the Project. Hydrogen generated by the Project will be either be directly injected into the adjacent, existing SoCal Gas natural gas pipeline (see Figure 2) or temporally loaded and stored in compression or cooled liquid containers for transport to market by hydrogen powered tractor trailers for use in both light and heavy-duty transportation vehicles. All handling and storage of the hydrogen will be per State and federal regulations. Additionally, storage, use, and disposal procedures for onsite hazardous materials would be dictated by a Hazardous Materials Business Plan (HMBP) that would be developed prior to construction.

As part of the CWA, the U.S. EPA oversees and enforces the Oil Pollution Prevention regulation contained in Title 40 of the Code of Federal Regulations, Part 112, which is often referred to as the "SPCC rule" because the regulations describe the requirements for facilities to prepare, amend, and implement Spill Prevention, Control, and Countermeasure (SPCC) Plans. The Project is subject to SPCC regulations due to the presence of oil on site. Mitigation Measure MM-HAZ-1, Spill Prevention, Control, & Countermeasures Plan, ensures that a SPCC plan will be prepared and implemented.

Additionally, spill prevention measures and secondary containment would be implemented as part of the Project, where warranted and as required by MM HYD-1 (Stormwater Pollution and Prevention Plan (SWPPP). The use, storage, transport, and disposal of hazardous materials used in construction, operation, and decommissioning of the facility would be carried out in accordance with federal, State, and local regulations. Therefore, the impacts from transport, use, disposal or accidental spill or release of hazardous materials would be less than significant.

c) *Construction, O&M, and Decommissioning*. The proposed site is in a remote area with few residences in the vicinity. The access to the Project would be off of Kaiser Road, a two-lane local county road. The Kaiser Road would be maintained throughout construction, and appropriate detours would be provided in the event of potential road or lane closures. Road and lane closures as part of the Project are not anticipated, but the County would be notified of any road and lane closures in advance, to prevent issues with emergency access. Once constructed, operation activities would include hydrogen facility operations and transport, and maintenance of hydrogen and solar facilities. These O&M activities are not expected to require any temporary travel lane closures that could restrict emergency vehicle movements. The

Project would not alter emergency evacuation or access in the areas around the Project site. The required Vehicle Management Plan would require early notification of closures to emergency services providers and residences (see Section 5.18, Transportation, MM TRA-1). With advance notification, impacts would be less than significant.

d) *Construction, O&M, and Decommissioning*. There are no schools with¼1/4 -mile of the Project. There is only one school in the general vicinity of the proposed Project, listed as Eagle Mountain Elementary School, located approximately 3.5 miles northwest of the Project site (Google Earth 2023). It supports kindergarten through eighth grade students. Therefore, there would be no impact to schools from Project related hazardous materials use.

e) *Construction, O&M, and Decommissioning*. The Project does not have any sites listed as hazardous materials sites pursuant to Government Code Section 65962.5. Additionally, there are no other hazardous materials sites on the Project listed on the GeoTracker or EnviroStor websites (SWRCB 2023; DTSC 2023). Therefore, there would be no impact from known hazardous materials sites.

Mitigation: Mitigation Measure TRA-1 and Mitigation Measure HYD-1.

MM HAZ-1: Spill Prevention, Control, & Countermeasures Plan.

As outlined within Code of Federal Regulations 40 Part 112, prior to operations on-site, Skybridge Energy LLC shall develop a Spill Prevention, Control, and Countermeasures Plan that includes specific prevention controls included within the design of the facility to ensure that potential releases will not flow into waterways. Skybridge Energy LLC will conduct regular inspections of these drainages. Skybridge Energy LLC will maintain records documenting the results of these inspections. The plan will also include counter-measures in the planning stages as far as engineering controls where adequate containment of an oil release will be provided. Additionally, the plan will address and document the regularity of inspections to verify that the equipment is functioning properly and make repairs promptly as necessary.

Monitoring: Compliance will be verified through the implementation of mitigation requirements, including required plan and report submittals.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
22. Airports				
a) Result in an inconsistency with an Airport Master Plan?	☐	☐	☐	☒
b) Require review by the Airport Land Use Commission?	☐	☐	☐	☒
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

Source(s): Riverside County General Plan Figure S-20, "Airport Locations," Riverside County Airport Land Use Commission (RCALUC 2004), GIS database

Findings of Fact:

a-d) *Construction, O&M, and Decommissioning*. The Project would not result in an inconsistency with an Airport Master Plan. The Project is located 6 miles away from the Desert Center Airport. The Project is not

located within an airport land use plan and would not require review by the Airport Land Use Commission. The airport has one runway and is part of the Chuckwalla Valley Raceway and is available for daily use for airplane, helicopter, and skydiving operations. No master plan has been prepared for the Desert Center Airport and because the airport activity level is very low, the outer edge of the FAR Part 77 horizontal surface serves to define the Airport Influence Area Boundary. The Project site is not located within the Airport Influence Area Boundary nor any of the Airport Compatibility Zones; the Airport Influence Area Boundary and the outer edge of Compatibility Zone E are located just east of the portion of the Project east of Highway 177. The inactive (closed) Eagle Mountain airstrip is located approximately 2.5 miles north of the Project site. Compatibility Zone E is defined as the area wherein 10 to 15 percent of near-airport accidents occur and where concern for risks applies to uses for which potential consequences are severe (e.g., very-high-intensity activities in a confined area). There are no active private airstrips or heliports nearby; therefore, there would be no safety hazards related to these land use types. There would be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.10. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
23. Water Quality Impacts				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	☐	☐	☒	☐
d) Result in substantial erosion or siltation on-site or off-site?	☐	☐	☒	☐
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	☐	☐	☒	☐
f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
g) Impede or redirect flood flows?	☐	☐	☒	☐
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	☐	☐	☐	☒
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Source(s): Riverside County General Plan Figure S-9, "Special Flood Hazard Areas," Figure S-10, "Dam Failure Inundation Zone," (Riverside County 2016), GIS database

Findings of Fact:

a) *Construction and Decommissioning.* Construction would require excavation and grading for the hydrogen facility, access roads, and underground electrical collection system. Solar areas would be mowed and grubbed to minimize soil disturbance. Disturbance of soil during construction could result in soil erosion and lowered water quality through increased turbidity and sediment deposition into local drainageways. Accidental spills or disposal of harmful materials used during construction could wash into and pollute surface waters or groundwater. Materials that could contaminate the construction area or spill or leak include lead-based paint flakes, diesel fuel, gasoline, lubrication oil, cement slurry, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, and other fluids.

Potential threats to surface water during construction would be minor and limited by measures required to prevent contamination of surface and ground water. Onsite unvegetated ephemeral dry washes would be incorporated into the Project design (see MM BIO-9 regarding State water permitting requirements).

Adjacent and nearby offsite drainageways are normally dry. Should contaminant spills occur during construction, these would be cleaned up prior to water being contaminated and conveyed to downstream waters such as Big Wash to the east which conveys flows to Palen Lake. Big Wash is shown as an intermittent stream on USGS topographic maps and is identified as an intermittently flooded riverine system by USFWS NWI. Therefore, any contamination of surface waters from most of the site and downstream offsite waters is unlikely due to dry conditions.

Project excavations would be limited to foundation installations at the hydrogen facility, surface grading and compaction of the staging area, and excavation of underground electrical system trenches (typically 20 – 36”). Since groundwater within the Chuckwalla Valley Groundwater Basin is well below the maximum depth of excavation, there is little likelihood that this groundwater could be affected during construction. Secondary containment for hazardous materials such as fuels would be required by law, as well as the development and implementation of a Spill Prevention Control and Countermeasure (SPCC) Plan, as required by MM HAZ-1 (or required due to regulatory requirements as discussed Section 5.9). The fuels stored on-site would be in a locked container within a fenced and secure temporary staging area. Temporary portable sanitation facilities will be provided for construction and these will be maintained by a licensed hauler. A site-specific Stormwater Pollution and Prevention Plan (SWPPP) would also be required and would prevent water contamination from spills and sediment disturbance during construction. The Construction General Permit, issued pursuant to the federal CWA, regulates stormwater runoff from construction sites of one acre or more in size. The permit is a statewide, general order issued by the SWRCB and implemented and enforced by the RWQCBs. For all new qualifying projects, applicants must electronically file permit registration documents using the Stormwater Multiple Application and Report Tracking System (SMARTS) and must include a Notice of Intent (NOI), risk assessment, site map, and SWPPP to be covered by the Construction General Permit prior to beginning construction. The risk assessment and SWPPP must be prepared by a State-qualified SWPPP Developer.

The SWPPP would include measures for diverting flow around disturbed areas, managing overland flow with temporary and permanent measures such as silt and straw fencing, stabilizing areas of concentrated flow, and prevention of tracking of sediment by vehicles. Site inspections would be conducted on a regular basis and after rainfall events exceeding 0.5 inches to ensure proper function of the stormwater control measures described in the SWPPP. Areas of temporary disturbance would be revegetated.

O&M. Potential threats to surface water quality during O&M would be minor. Most O&M activities do not involve ground disturbance except for inspection and maintenance of access roads to minimize the potential for ongoing erosion. Any potential impacts related to accidental hydrogen spills would depend on whether the hydrogen is being stored as compressed gas or liquid state. Spills of brine could also occur from the Water Treatment Facility. Such potential hydrogen and brine spills and their clean up would be contained within the hydrogen facility and addressed in the SPCCP. If disposal of brine in an onsite well

is used, the well depth would be well above groundwater depths. The only potential fluid spills within the solar facility would be limited to replacement lubricating fluids which would be minor and any spills of which would be subject to the SPCCP. Potential spill during decommissioning would be similar to construction.

With these protection measures in place, impacts to surface or groundwater quality would be less than significant.

b) *Construction, O&M, and Decommissioning*. Construction water use is expected to be approximately 5.2 acre-feet (1.7 million gallons)total. During operations, the electrolyzers will use 2.4 gallons of water to produce 1 kg of green hydrogen. Running the electrolyzers for 20 hours a day would require approximately 0.17 acre-feet (54,632 gallons)per day or 61.2 acre-feet (approximately 20 million gallons) per year. Additionally, during O&M, approximately 0.006 acre-feet (2,000 gallons) per year will be used for panel washing if performed approximately two times per year. Finally, an additional 0.05 acre-feet (16,293 gallons) per year of water will be required for the O&M building. The water source for the electrolyzers would be from an onsite well.

The Coachella Valley Groundwater Basin (CVGB) is an unadjudicated groundwater basin, which means that the owners of property overlying the CVGB have the right to pump groundwater from the CVGB for reasonable and beneficial use, provided that the water rights are neither severed nor reserved. The recoverable storage of the CVGB is estimated to be 15,000,000 acre-feet (CDWR 2004). The Project would consume 61.2 acre-feet of water per year, when operating 50 MW of electrolyzers 20 hours per day, which is well below the estimated normal-year CVGB annual calculated surplus of 2,390 acre-feet (approximately 0.02 percent of the total storage in the CVGB) (Phil Lowe 2020). In dry or critically dry years, the CVGB would be in a groundwater deficit, ranging from 0.02 percent to 0.06 percent of the total storage. Under average conditions, the Skybridge Project alone would not cause, nor contribute to a groundwater deficit and would contribute only a minimal amount to a deficit in dry or critically-dry scenarios. Future expansion could occur given water availability and provision of additional power by SCE. The expansion would increase the Project capacity to 500 MW, which would consume 612 acre-feet of water per year. However, there is substantial uncertainty regarding the baseline groundwater budget. With implementation of Mitigation Measure HYD-2, annual groundwater monitoring, the Project's impact would be less than significant.

c) *Construction, O&M and Decommissioning*. Project activities, including excavation and grading for the hydrogen facility, staging area, and access roads would not substantially alter the existing drainage pattern of the site. Further, solar panel areas would be mowed and grubbed, instead of graded; thereby, maintaining existing onsite drainage patterns and facilitating vegetation cover. Impervious surfaces on the Project site would be limited to the driveway and parking areas, and foundations for the buildings, electrolyzers, and switchgear and truck fueling equipment, equaling approximately 4.2 acres or 3% of the project site surface. There are no streams or rivers on the site and onsite unvegetated ephemeral dry washes would be incorporated into the Project design (see MM BIO-9 regarding State water permitting requirements). The engineering of the project would incorporate the existing drainage pattern of the site and any impacts to it would be less than significant.

d) *Construction and Decommissioning.* Construction activities include excavation and grading for the hydrogen facility, staging area, and access roads. Solar panel areas would be mowed. These activities could result in soil erosion, and potential siltation of water depositing into local drainageways. However, the Project site has slopes ranging from 1% to 3%; thereby, minimizing the potential for erosion. Further, a project-specific SWPPP would be required and would include measures for diverting flow around disturbed areas with temporary and permanent measures such as silt and straw fencing, and areas of temporary disturbance would be revegetated. These measures are put in place to prevent erosion and siltation of water. Therefore, the Project would have a less than significant impact.

e) *Construction, O&M, and Decommissioning*. With the exception of foundations and associated facilities within the hydrogen facility (electrolyzers and storage, water treatment plant, and O&M building) and solar panel pilings, no other impervious surfaces will be added to the Project site as a result of construction. Therefore, the Project would not increase the rate or amount of surface runoff. Further, the Project is not located in a County special flood hazard area. Therefore, runoff that does exist now is not enough to result in flooding on the Project site where Project facilities will be located. Finally, there would not be an increased risk of flooding off-site as a result of the Project, due to the arid climate and because none of the drainageways on the site carry sufficient water to generate runoff except during infrequent rains. Therefore, the Project would have a less than significant impact.

f) *Construction, O&M, and Decommissioning*. The Project would not increase the amount of runoff as described above. Since the area is in an arid climate, the local drainageways are normally dry. In the event of a contaminant spill during construction, it would be cleaned up prior to any water being contaminated and conveyed downstream. The site-specific SWPPP would be required and would prevent water contamination from spills and sediment disturbance during construction, preventing any polluted runoff. The SWPPP would include measures for diverting flow around disturbed areas, managing overland flow with temporary and permanent measures such as silt and straw fencing, stabilizing areas of concentrated flow, and prevention of tracking of sediment by vehicles. Site inspections would be conducted on a regular basis and after rainfall events exceeding 0.5 inch to ensure proper function of the stormwater control measures described in the SWPPP. During operation, there would be no runoff created that would exceed the capacity of existing site drainage, and there are no existing or planned stormwater drainage systems onsite or in the immediate area. Therefore, the impact would be less than significant.

g) *Construction, O&M, and Decommissioning*. The Project would not impede or redirect flood flows. The project is in an area that has an arid climate, and the project site is not in an area that could flood (see 5.10.e. above). Fencing would be pass through wildlife fencing, so drainage across the site would be unobstructed. Drainage off the project site would not be impeded or redirected due to the Project. Therefore, the impact would be less than significant.

h) *Construction, O&M, and Decommissioning*. The Project is not in any flood hazard, tsunami, or seiche zones; therefore, there is no impact.

i) *Construction, O&M, and Decommissioning*. The Project would not obstruct or conflict with implementation of a water quality control plan or sustainable groundwater management plan. During construction, the developer would follow guidelines set by these plans to protect water resources, by following the SWPPP, and by adhering to the Sustainable Groundwater Management Act (SGMA). The Project site does not have a Sustainable Groundwater Plan, but the CVWMP satisfies the requirements of the SGMA. The Project would adhere to subject management criteria and would not interfere with the goals of sustainable water management, such as overdraft, since the Project would only use large amounts of water during construction or operations relative to the annual deficit of the CVGB (see 5.10.b above). Therefore, there would be no impact.

Mitigation: Compliance will be verified through the implementation of mitigation requirements, including required plan and report submittals.

MM HYD-1 **Stormwater Pollution and Prevention Plan (SWPPP).** Following project approval, the Project owner will prepare and implement a SWPPP, as required by State law, to minimize construction impacts on surface water and groundwater quality. Implementation of the SWPPP will help stabilize graded areas and reduce erosion and sedimentation.

The SWPPP shall provide specific construction related BMPs to prevent soil erosion and loss of topsoil. BMPs, where applicable, will be designed by using specific criteria from recognized BMP design guidance manuals. Erosion control measures identified will be installed in an area before construction begins during the wet season and before the

onset of winter rains or any anticipated storm events. Temporary measures such as silt fences or wattles, intended to minimize sediment transport from temporarily disturbed areas, will remain in place until disturbed areas have stabilized.

During construction activities, measures will be in place to prevent contaminant discharge. Post-construction requirements require that construction sites match pre- project hydrology to ensure that the physical and biological integrity of aquatic ecosystems are sustained in their existing condition.

The plan will be updated during construction as required by the SWRCB. At a minimum, the SWPPP includes the following:

- A description of construction materials, practices, and equipment storage;
- A list of pollutants likely to contact stormwater and site-specific erosion and sedimentation control practices;
- A list of provisions to eliminate or reduce discharge of materials to stormwater;
- BMPs for fuel and equipment storage;
- Non-stormwater management measures such as installing specific discharge controls during activities such as paving operations and vehicle and equipment washing and fueling; and
- A commitment that equipment, materials, and workers will be available for rapid response to spills and/or emergencies. All corrective maintenance or BMPs will be performed as soon as possible, depending upon worker safety.

A worker education program shall be established for all field personnel prior to initiating fieldwork to provide training in the appropriate application and construction of erosion and sediment control measures contained in the SWPPP. This education program will also discuss appropriate hazardous materials management and spill response. Compliance with these requirements will be ensured by the on-site construction contractor.

MM HYD-2 **Groundwater Monitoring, Reporting, and Mitigation Plan.** Before the project uses groundwater pumped from any Applicant owned and/or operated well (on site or off site) that extracts water from the CVGB, the Applicant shall retain a qualified hydrogeologist to develop a Groundwater Monitoring, Reporting, and Mitigation Plan (GMRMP), in coordination with Riverside County, to ensure that groundwater wells surrounding project supply well(s) are not adversely affected by project activities. The Applicant shall submit the GMRMP to Riverside County for review and approval. The GMRMP shall provide a detailed methodology for monitoring site groundwater levels and comparisons for levels within the basin including identification of the closest private wells to the project's well(s). Groundwater level data from wells at adjacent and nearby solar facilities shall be reviewed and compared, if available. Monitoring shall be performed to establish pre-construction and project-related groundwater level and water quality trends that can be quantitatively compared against observed and simulated trends near the project's pumping well(s) and near potentially impacted existing wells. The GMRMP shall include an annual monitoring program to be implemented during project operations. The annual data reports shall be prepared and submitted to Riverside County for review and shall include water level monitoring data and effect on the nearest off-site private wells.

Monitoring Compliance will be verified through the implementation of mitigation requirements, including required plan and report submittals.

5.11. Land Use/Planning

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
24. Land Use				
a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?	☐	☐	☐	☒

Source(s): Riverside County General Plan Land Use Element (Riverside County 2021a), Desert Center Area Plan (Riverside County 2021b), Riverside County Desert Center Area Plan Figure 3 "Desert Center Area Plan Land Use Plan," (Riverside County 2021c), GIS database, Project Application Materials

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. All activities associated with the Project would occur within the Project site, aside from the SCE tie-in and SoCal Gas stub pipeline. The Project improvements would be consistent with established land uses in the surrounding areas of the Project site, including an existing large scale solar development (Desert Sunlight) and electrical distribution lines. The Project would be consistent with the County's planning and zoning designation of Open Space Rural. See Section 2, Applicable General Plan and Zoning Regulations, which includes a consistency review of the relevant county land use policies. Construction and decommissioning of the Project would not conflict with any land use plan, policy, or regulation. No impact would occur.

b) *Construction, O&M, and Decommissioning*. The Project will not divide or disrupt the physical arrangement of an established community. The Project site and the areas around the Project site consist of vacant desert land or existing solar developments. The Project site is approximately 330 feet away from the nearest inhabited dwelling. The Project would not introduce any new infrastructure that could create a barrier across an existing community, due to the distance to any community. Construction and decommissioning of the Project would not divide or disrupt an established community. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.12. Mineral Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
25. Mineral Resources				
a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	☐	☐	☐	☒

Source(s): Riverside County General Plan Multipurpose Open Space Element, Figure OS-6, "Mineral Resources Zones" (Riverside County 2015)

Findings of Fact:

a-c) *Construction, O&M, and Decommissioning*. The Project is located in a California Geological Survey designated Mineral Resource Zone (MRZ) identified as MRZ-4, which are areas where there is not enough information available to determine the presence or absence of mineral deposits; therefore, the significance is undetermined. The Project would not interfere with any active mining operations and would not include any mineral extraction. The potential for mineral development in the future after the use of the site for a solar and hydrogen project will remain the same. Construction, operation, or decommissioning of the Project would not constitute a substantial impact on regionally or locally important mineral resources. Therefore, no loss in availability of known mineral resources would occur.

There are no proposed, active, or abandoned mining operations on the Project site. There are no delineated mineral resource recovery sites identified in the Riverside County General Plan or the Desert Center Area Plan. Therefore, there would be no impact related to loss of availability of a locally important mineral resource recovery site. Additionally, no potential exists to expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts to mineral resources would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.13. Noise

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
26. Airport Noise				
a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Source(s): Desert Center Area Plan Figure 4, "Overlays and Policy Areas:" (Riverside County 2021), County of Riverside Airport Facilities Maps (Riverside County 2004)

Findings of Fact:

a-b) *Construction, O&M, and Decommissioning*. The Project is not located within the vicinity of a private airstrip or an airport land use plan. The Project is located approximately 2.5 miles southeast from the Eagle Mountain Airport, and over 6 miles northwest from the Desert Center Airport. Therefore, the Project would not expose people residing or working in the areas around the Project site to excessive noise levels during construction or operation. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
27. Noise Effects by the Project				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☐	☒

Source(s): Riverside County General Plan Noise Element (Riverside County 2015), Table N-1 ("Land Use Compatibility for Community Noise Exposure"), Project Application Materials, Transportation and Construction Vibration Guidance Manual (Caltrans 2020), County of Riverside Airport Facilities Map (Riverside County 2004), Riverside County Noise Ordinance No. 847 (Riverside County 2007)

Findings of Fact:

a) *Construction and Decommissioning.* Noise would be generated during construction of the proposed Project. Heavy-duty construction equipment would be used on the site and in the surrounding area for transporting equipment and materials by truck to the site. Construction of the Project would create short-term and temporary construction noise levels.

Construction equipment would operate Monday through Friday between 7:00 a.m. and 7:00 p.m. The County Noise Ordinance allows for different levels of acceptable noise depending upon land use. The Noise Ordinance or Ordinance No. 847 (Regulating Noise) is incorporated in the County Code as Chapter 9.52 (Noise Regulation). The standards in Chapter 9.52.040 (also Section 4 of Ordinance No. 847) limit noise sources on any property from causing excessive exterior noise on any other nearby occupied property. The Riverside County Noise Ordinance allows noise from construction activities, and designates this noise as exempt, when the construction project is located within one quarter of a mile from the nearest inhabited dwelling (the closest residence to the Project site is 330 feet), given that construction does not occur between the hours of 6:00 p.m. and 6:00 a.m. during the months of June through September, and does not occur between the hours of 6:00 p.m. and 7:00 a.m. during the months of October through May. A variance to the Riverside County Noise Ordinance would be secured if Sunday, holiday, or construction outside of the hours listed in the Noise Ordinance is required.

During construction, depending on local existing daytime conditions along access roads, there could be a perceptible and noticeable increase in traffic noise levels due to haul truck trips during up to 9 months of construction; each construction phase will take approximately 3 months and might not necessarily be immediately sequential. A majority of these trips would occur on designated truck routes and major streets. Although this Project generated vehicle noise would be noticeable, this traffic noise on public streets is exempt under the Noise Ordinance, and construction traffic noise levels would be considered normally acceptable by the Noise Element of the County General Plan. Further, this construction generated noise would be temporary and would not result in a significant permanent ambient noise-level increase once the Project is operational. During decommissioning, the impacts to noise would be similar to construction. Therefore, construction and decommissioning noise impacts would be less than significant.

O&M. During operation of the Project, noise would be created by the electrolyzers when they operate, from project-related traffic, and operation and maintenance activities. The electrolyzers would operate

up to 20 hours a day. There aren't any moving parts on the electrolyzers themselves. The electrolyzer specification sheets state <72 decibels (dB) (A) @ 10 feet which is equivalent to what the Hearing Health Foundation says compares to average office noise. Since sound energy intensity reduces with the square of the distance from the source (Inverse Square Law), the noise intensity at the nearest resident which is approximately 330 feet away, would be 41.6 dB (OMNI Calculator 2023). A sound level of 41.6 dB is approximately equivalent to a refrigerator hum (40 dB), and less than the sound level of a normal conversation or an air conditioner (60 dB). Sounds at levels less than 60 dB typically don't cause hearing damage or adverse reactions after repeated exposure (CDC 2022).

In the Project region, the Riverside County Noise Ordinance states that for land designated as Open-Space Rural in the General Plan, the maximum decibel level shall not exceed 45 dB Lmax[4] during the daytime or nighttime hours. All equipment within the Project site would be required to comply with the stationary source noise standards of the Noise Ordinance. The overall noise levels caused by the Project would be subject to the 45 dBA Lmax standard of the Noise Ordinance that applies at the boundary of any nearby occupied property. Given that the noise level would be 41.6 dB at the closest residence, approximately 330 feet away, the noise from operation of the proposed Project would not exceed the most restrictive noise standard of 45 dBA at any residential property boundary. The impact of operation noise relative to applicable community noise standards would be less than significant.

b) *Construction, O&M, and Decommissioning*. Ground-borne vibrations dissipate rapidly with increasing distance from the vibration source. The distances involved depend primarily on the intensity of the vibrations generated by the source, and partly on soil and geologic conditions. For vibration sources such as construction activity and vehicle traffic, the region of influence is typically less than 200 feet from the vibration source (Caltrans 2020).

During construction, the impact or vibratory pile drivers used for installing steel piles would have the greatest radius of potential ground borne vibration impacts. When necessary to install piles near the proposed project site boundaries, use of hydraulic hammers for pile installation could result in vibration that is perceptible and potentially annoying, for occupants of structures within 100 feet of the source. (Riverside County 2015). However, no occupied residential structures would be nearer than approximately 330 feet from the Project; therefore, no residences would experience annoying levels of construction vibration. Decommissioning is expected to have similar impacts as construction. There would be no construction or decommissioning vibration impacts.

Operation of the solar facility and electrolyzers would not involve any sources capable of generating perceptible levels of vibration to residences in the surrounding area since the region of influence is typically less than 200 feet from the vibration source and the closest residence is 330 feet away. There would be no permanent source or potential to change vibration levels, except during unscheduled maintenance or repair activities, which would be similar to construction activities. There would be no operational vibration impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

[4] dB Lmax is a measurement of noise. dB stands for Decibel, a unit for measuring the relative amplitude of a sound equal approximately to the smallest difference normally detectable by the human ear. Lmax stands for the maximum sound level.

5.14. Paleontological Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
28. Paleontological Resources				
a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	☐	☒	☐	☐

Source(s): Riverside County General Plan Figure OS-8, "Paleontological Sensitivity," (Riverside County 2015), Appendix F, Paleontological Survey Report for the Skybridge Energy Connection Project (PaleoWest 2022)

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. To determine if the Project would potentially impact paleontological resources, PaleoWest, LLC (PaleoWest) conducted a geology map review, a literature review, and requested that the Western Science Center (WSC) in Hemet conduct a paleontological record search for Project site. PaleoWest also conducted a pedestrian survey of the current Project site and surrounding area for this analysis. The report is included as Appendix F.

A review of the geology of the area concluded that the Project entirely in Quaternary alluvium (Qa/Qal). Quaternary age (Holocene) alluvium is mapped throughout the Project site and is composed of unconsolidated sand, silt, clay, and gravel representing an alluvial depositional environment. Holocene age (11,700 years ago to present) sediments typically do not contain significant fossils because they are too young to preserve in-situ fossils, but these deposits locally contain and shallowly overlie older (Pleistocene age, 2.6 million years ago to 11,700 years ago) sediments. Additionally, Pleistocene-age fossils have been discovered at the surface in the same Holocene-age unit and near the Project site as indicated by the WSC and described below. This indicated either that Pleistocene age deposits occur at a very shallow depth, or the age of these surficial deposits is not accurate according to geologic mapping.

The WSC indicated there were no previously recorded fossil localities in their records directly within the Project site; however, there are eight vertebrate fossil localities within a one-mile radius of the Project site from Quaternary-age alluvium. Quaternary alluvial sites in close proximity to the Project site which have produced fossils currently reposited at the WSC, have preserved a sabre-tooth cat (Smilodon sp.) and camel (*Hemiauchenia* sp.).

PaleoWest conducted a pedestrian survey of the Project site on December 14, 2021 (see Appendix F). Alluvium was observed on the surface throughout the Project site. It consists of unconsolidated, coarse-grained sand with abundant subrounded to subangular metamorphic-igneous pebbles and cobbles with no graded bedding or other observed sedimentary structures. Surficial deposits transition at approximately three feet of depth into tan-light brown, moderately compacted, silt to fine-grained sand. Vegetation in the Project site is sparse, accounting for approximately ten percent of the surface cover. No new fossil localities were discovered during the pedestrian survey.

The record search, literature review, and the survey did not indicate the presence of paleontological resources within the Project site. However, Quaternary alluvium in the general area and adjacent property have produced a number of fossil localities despite these deposits being mapped as Holocene-age alluvium, which would normally be considered to have low sensitivity. On the surface there is low potential for fossil recovery, but with increasing depth, 3-feet below the surface or deeper, the potential for presence of fossils increases. Therefore, it is possible that vertebrate fossils could be located subsurface within the Project site. Project excavations deeper than 3 feet would be limited to foundation excavations. Previously unknown buried paleontological resources could be uncovered, damaged, or destroyed during construction ground-disturbing activity, which would be considered a potentially significant impact.

Implementation of Mitigation Measures PAL-1 and PAL-2 would reduce potential impacts to unknown paleontological resources to a less than significant level.

Mitigation:

PAL-1 **Paleontological Resources Monitoring Plan (PRMP).** Prior to issuance of grading permits:

The applicant shall retain a QUALIFIED PROFESSIONAL PALEONTOLOGIST (Principal Investigator, Project Paleontologist) and PALEONTOLOGICAL RESOURCE MONITORS as defined by the Society of Vertebrate Paleontology (SVP Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010 and updates), and that is approved by the County to create and implement a project-specific plan for monitoring site grading/earthmoving activities (project paleontologist).

The qualified professional paleontologist retained shall review the approved development plan and grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted for approval by the County Geologist prior to issuance of a Grading Permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standards and Society of Vertebrate Paleontology standards, are as follows:

- A corresponding and active County Grading Permit (BGR) Number must be included in the title of the report. PRIMP reports submitted without a BGR number in the title will not be reviewed.
- PRIMP must be accompanied by the final grading plan for the subject project.
- Description of the proposed site and planned grading operations.
- Description of the level of monitoring required for all earth-moving activities in the project area.
- Identification and qualifications of the qualified professional paleontologist and paleontological monitor (SVP) to be employed for grading operations monitoring.
- Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens.
- Direction for any fossil discoveries to be immediately reported to the property owner who in turn will immediately notify the County Geologist of the discovery.
- Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays.
- Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.
- Procedures and protocol for collecting and processing of samples and specimens.
- Fossil identification and curation procedures to be employed.
- Identification of the permanent repository to receive any recovered fossil material. *Pursuant the County “SABER Policy”, paleontological fossils found in the County should, by preference, be directed to the Western Science Center in the City of Hemet. A written agreement between the property owner/developer and the repository must be in place prior to site grading.

- All pertinent exhibits, maps, and references.
- Procedures for reporting of findings.
- Identification and acknowledgement of the developer for the content of the PRIMP as well as acceptance of financial responsibility for monitoring, reporting and curation fees. The property owner and/or applicant on whose land the paleontological fossils are discovered shall provide appropriate funding for monitoring, reporting, delivery and curating the fossils at the institution where the fossils will be placed and will provide confirmation to the County that such funding has been paid to the institution. All reports shall be signed by the qualified professional paleontologist (SVP) responsible for the report's content. All reports shall also be signed by all other parties responsible for the report's content (eg. Professional Geologist), as necessary. A signed electronic copy of the report, project plans, and all required review applications shall be uploaded to the County's PLUS Online System. Please use the following for this purpose:
  - https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/Filing_Instructions_Paleontological_Report_Review_Application.pdf
  - https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/PLUS_Online_Upload_Instructions_Paleontology.pdf
  - https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/Supplemental_Information_Form_PALEO.pdf

Reports and/or review applications are not to be submitted directly to the County Geologist, Project Planner, Land Use Counter, Plan Check, or any other County office. In addition, the applicant shall submit proof of hiring (i.e., copy of executed contract, retainer agreement, etc.) a project paleontologist for the in-grading implementation of the PRIMP.

Per the County's SABER (Safeguard Artifacts Being Excavated in Riverside County) Policy, paleontological fossils found in the County of Riverside should, by preference, be directed to the Western Science Center in the City of Hemet.

PAL-2 **Worker Environmental Awareness Program (WEAP).** Prior to the start of construction, all field personnel will receive a worker's environmental awareness training on paleontological resources. The training will provide a description of the laws and ordinances protecting fossil resources, the types of fossil resources that may be encountered in the Project site, the role of the Paleontological Monitor, outline steps to follow in the event that a fossil discovery is made and provide contact information for the Project Paleontologist. The training will be developed by, or in consultation with, the Project Paleontologist and can be delivered concurrent with other training including cultural, biological, safety, etc.

Monitoring: All workers would receive the WEAP and spot checking will be required.

5.15. Population and Housing

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
29. Housing				
a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	☐	☐	☐	☒
c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

Source(s): Project Application Materials, GIS database, Riverside County General Plan Housing Element (Riverside County 2021), US Census Bureau ACS 5- Year Estimates Data Profile (US Census Bureau 2021).

Findings of Fact:

a-c) *Construction, O&M, and Decommissioning*. The Project would construct, operate, and decommission a solar facility and hydrogen production facility. According to the ACS 5-year Estimates Data Profile of Desert Center Census Designated Place, there are 115 vacant housing units out of 241 housing units total in Desert Center; therefore, there are sufficient vacant housing units to support the number of construction workers, and the proposed project would not trigger the need for new housing.

The Project would not require the permanent removal or displacement of housing or persons that would warrant replacement housing elsewhere. The Project would not induce substantial unplanned population growth in the area directly or indirectly. The Project would not create a demand for additional housing, either due to displacement, or housing affordable to households earning 80% or less of the County's median income. No new housing, extension of roads, or other infrastructure are proposed as part of the Project.

During construction or decommissioning, some workers may reside in the area near the Project site temporarily, and relocate after the Project construction is completed. It is expected that up to 10 workers will be required for construction or decommissioning, and up to 10 workers will be required for operation and maintenance of the Project. It is expected that this workforce will commute from surrounding communities, or the local labor force. If this workforce decided to live in the nearby community, there would be sufficient vacant housing units to accommodate the workers. This number of additional permanent workers would not create a demand for additional housing in the area. Therefore, no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.16. Public Services

Would the project	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
30. Fire Services				
Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire services?	☐	☒	☐	☐

Findings of Fact:

Construction, O&M, and Decommissioning. The Project site is located within a State Responsibility Area, mapped as a Moderate Fire Hazard Severity Zone. Some parcels of land surrounding the Project site are either not within a State Responsibility Area or are mapped as Moderate. There are no Federal Responsibility Areas nearby.

Emergency response via the fire department could be required at the Project site in the event of an accident during construction or operations. The likelihood of an accident requiring such a response is unknown and expected to not be significant, because construction and maintenance activities associated with the Project are short term and temporary. The Project will not induce an increase in population that would require additional fire protection.

Construction, decommissioning, and routine maintenance of the Project is not expected to significantly increase the risk of fire. During construction and decommissioning, fires could be caused by a variety of factors, including vehicle exhausts, sparks associated with grading activities, welding activities, parking on dry vegetation, and the overall temporary increase in human activity. Fire extinguishers and other portable fire-fighting equipment would be available on site, as well as additional water for use at the O&M facility. These fire extinguishers would be maintained in accordance with local and federal Occupational Safety and Health Administration (OSHA) requirements. Locations of portable fire extinguishers would include, but not be limited to, office spaces, hot work areas, flammable storage areas, and mobile equipment such as work trucks and other vehicles.

Operation of the Project is not expected to significantly increase the risk of fire. Solar arrays and PV modules are fire-resistant, as they are constructed largely of steel, glass, aluminum, or components housed within steel enclosures. Fire protection would include minimizing flammable materials in the solar field, such as vegetation. During construction and operation, vegetation and electrical systems would be continually maintained to avoid fire risks. For hydrogen facilities, fire prevention includes fire-safe control of fuel sources, reduction of ignition sources, availability of water, and proper maintenance of firefighting systems.

A comprehensive Fire Management and Prevention Plan will be prepared for construction, operation, and decommissioning of the Project to identify the fire hazards and response scenarios that may be involved with operating the facility. The plan is described in Section 5.21, Wildfire, as Mitigation Measure FIRE-1. The plan will follow the published guidance of the U.S. Department of Energy for hydrogen facilities and will be prepared in conjunction with the Riverside County Fire Department or other emergency response organizations. The applicant will also submit a Business Emergency Plan which explains the safety protocols and procedures for stored hydrogen on site. With mitigation incorporated, impacts would be less than significant.

Mitigation: MM FIRE-1 (See Section 5.21)

Monitoring: No monitoring is required.

Would the project	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
31. Sheriff Services				
Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for sheriff services?	☐	☐	☐	☒

Source(s): Riverside County General Plan (Riverside County 2021)

Findings of Fact:

Construction, O&M, and Decommissioning. The presence of workers and equipment associated with construction may attract vandals or other security risks to the area, which would increase demand on law enforcement services. However, the likelihood of requiring a response is unknown and not expected to be significant due to the temporary and short-term nature of construction, decommissioning, and maintenance activities. There would be adequate security measures in place, such as locked access gates, fencing, lighting, and optional off-site security personnel, depending on security risks. Additional security measures include infrared security cameras, motion detectors, and technology that would allow for live video monitoring of the site 24 hours a day, 7 days a week. These measures are to minimize the amount of service calls from this type of land use, although this type of land use is not typically a cause of high numbers of service calls. Therefore, there will be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
32. Schools				
Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?	☐	☐	☐	☒

Source(s): GIS database

Findings of Fact:

Construction, O&M, and Decommissioning. The Project would have no direct physical impact to schools. During construction and decommissioning, workers are expected to commute to the Project site from surrounding communities. Operations of the Project would not induce an increase in population.

Therefore, substantial increases in populations that would adversely affect local school populations are not expected, there would be no need to build additional facilities

The Desert Center Unified School District provides public education services for the area the Project site is located in. The nearest school to the Project is the Eagle Mountain School, located approximately 3.5 miles northwest, which serves kindergarten through eighth grade students (CDE 2022).

The applicant will be required to pay school fees in accordance with the State law due to proposed new commercial development (COA 80.Planning. – School Fees) for the solar facility.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
33. Libraries				
Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?	☐	☐	☐	☒

Source(s): Riverside County General Plan (Riverside County 2021)

Findings of Fact:

Construction, O&M, and Decommissioning. The Project's decommissioning, construction and maintenance activities would not generate a permanent increase in population that would impact public facilities, such as libraries. It is not anticipated that the Project would increase population in a way that would increase the need for libraries. Therefore, no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
34. Health Services				
Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for health services?	☐	☐	☐	☒

Source(s): Riverside County General Plan (Riverside County 2021)

Findings of Fact:

Construction, O&M, and Decommissioning. The Project's decommissioning, construction and maintenance activities would not generate a permanent increase in population that would impact public

facilities, such as health services. It is not anticipated that the Project would increase population in a way that would increase the need for health services. Therefore, no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.17. Recreation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
35. Parks and Recreation				
a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	☐	☐	☐	☒

Source(s): GIS database, Ord. No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications), Ord. No. 659 (Establishing Development Impact Fees) (Riverside County 2014 and 2013)

Findings of Fact:

a-c) *Construction, O&M, and Decommissioning*. The Project does not include any recreational facilities. The Project would not cause an increased use of any recreational facilities or parks. There are no parks within one mile of the Project. The Project is surrounded by the BLM Chuckwalla ACEC. The Joshua Tree National Park is nearby, approximately 3 miles to the west of the Project; however, the main entrance to the park is approximately 30 miles away on the north side of the JTNP.

There are federal lands nearby that are used for recreation, including several BLM open routes. There is one BLM open route that bisects the Project site in an east-west direction. This route would be closed prior to construction of the Project and would remain closed for the duration of the Project's life. This route accesses a jojoba farm on private land. Closing this route would not cause impacts since the route accesses private land and is not used for public recreation use.

The Project would not cause an increase in the local population, as there would be up to 10 permanent positions to operate the Project.

During construction and decommissioning, it is possible that some workers would reside in the region the Project is located in temporarily, but most workers are expected to commute to the Project site from surrounding communities. The Project would not induce local population growth that would cause an increased use of recreation lands or any parks nearby. The Project would be limited to construction, decommissioning, and operation of solar and hydrogen facilities, and none of the proposed activities would involve or prompt the construction or expansion of recreational facilities.

The Project site is not within the boundaries of any public agency designated to receive land dedication or fees pursuant to Section 10.35 of Ordinance No. 460. The Project would not result in an increase in population generating a need for recreational services. Therefore, no impacts associated with parks and recreational facilities would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
36. Recreational Trails				
a) Include the construction or expansion of a trail system?	☐	☐	☐	☒

Source(s): Riverside County Desert Center Area Plan Figure 6, Trails and Bikeway System (Riverside County 2021)

Findings of Fact: There will be no impacts.

a) *Construction, O&M, and Decommissioning*. The Project does not include the construction or expansion of a trail system. There are no trails near the Project, therefore there would be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.18. Transportation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
37. Transportation				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?)	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Cause an effect upon, or a need for new or altered maintenance of roads?	☐	☒	☐	☐
e) Cause an effect upon circulation during the project's construction?	☐	☐	☐	☒
f) Result in inadequate emergency access or access to nearby uses?	☐	☒	☐	☐

Source(s): Riverside County General Plan Circulation Element (Riverside County 2020a), Project Application Materials, Caltrans Traffic Census Program (Caltrans 2020a), Caltrans Transportation Impact Study Guide (Caltrans 2020b), County of Riverside's Transportation Analysis Guidelines (Riverside County 2020b)

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. There are no transit, bicycle, or pedestrian facilities nearby, and these would not be used to access the Project site – therefore, there would be no impact on these facilities. The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system.

Proof of legal access shall be required prior to building permit issuance as outlined under COA 80.Trans.1-Evidence Legal Access. Additionally, the project does not conflict with any County policy regarding mass

transit. Transportation Uniform Mitigation Fees (TUMF) mitigation fees shall be required (COA 80.Trans.2-TUMF) prior to any future building permits. Any oversized trucks would require permits through Caltrans and the County and would follow all safety requirements such as flaggers and flashing lights. Additionally, as discussed in Section 2, the Project would be consistent with the applicable policies related to the Project included within the County's General Plan Circulation Element, such as Policy C 2.3, relating to traffic studies.

Access to the Project would be via I-10, taking the CA-177 N/Rice Road exit, and travelling on Rice Road/SR-177 for approximately 0.22 miles, before travelling on Kaiser Road for approximately 7 miles to the Project. It is estimated that the Project would generate, on average, 32 trips per day during construction, and on average 45 trips per day during operation (see Table 3). The maximum daily trips for the project would be up to 50 trips daily, which may be reduced in the future if the brine were disposed of in a different manner than trucking it off site. The estimated maximum addition of up to 50 trips per day during operations would increase traffic volumes on the I 10, Rice Road/SR-177, and Kaiser Road. Given the existing daily traffic on I-10 in the Project region (approximately 26,500 vehicles for the junction of I-10 and SR-177 north), an additional 50 trips for operation (0.18% percent increase in daily traffic volumes) would be less than significant.

During operation, out of the approximately 50 trips per day, 30 of these would be truck trips. An estimated addition of approximately 30 daily truck trips would be a 0.3% percent increase in daily truck volumes (9,365 truck trips) on I-10 and SR-177/Rice Road in the Project region, which is considered less than significant (Caltrans 2020a). There would be even less daily truck trips if the Project injects the hydrogen directly into the adjacent, existing SoCal Gas natural gas pipeline on the Project site.

According to the County of Riverside's Transportation Analysis Guidelines, published in December 2020, the Project does not need to prepare a traffic study because the Project is estimated to generate fewer than 10 trips during the peak hour. The analysis guidelines state that generally, under a VMT analysis, there is a presumption that an impact is not significant if screening criteria is met, one of which is that a Project generates fewer than 110 daily trips. Given that the Project would generate less than 110 daily trips and would contribute to only a small increase in daily traffic volumes, this impact is less than significant.

b) *Construction, O&M, and Decommissioning*. As discussed in CEQA Guidelines Section 15064.3(b.3), a qualitative analysis of construction traffic vehicle miles travelled (VMT) may be appropriate. The Project would result in temporary traffic trips during construction. During construction, materials deliveries would travel up to 150 miles one way from source to the Project site. According to Table 3, Operational Vehicle Trips, the operational VMT is 845,863 VMT/year, which is approximately 2,317 VMT/day.

At this time, no known applicable VMT thresholds of significance for temporary construction trips that may indicate a significant impact are available. During construction, the Project would create 32 trips per day. Since construction would be temporary, it is anticipated that there would be no significant VMT impact for construction. Decommissioning is expected to create similar traffic to construction. Therefore, impacts would be less than significant.

c) *Construction, O&M, and Decommissioning*. The Project would not increase hazards due to geometric design features or incompatible uses. During construction, the Project would use existing roadways to deliver construction materials by truck. During operation, the Project could export hydrogen with hydrogen tube truck trailers on designated truck routes and major streets or could inject hydrogen directly into the adjacent, existing SoCal Gas natural gas pipeline on the Project site, requiring no truck trips for hydrogen transport. No impacts would occur.

d) *Construction, O&M, and Decommissioning*. The vehicles used for construction of the Project would be light and medium heavy-duty trucks (Class 6). Operations would use light and heavy-duty trucks (Class 7 or 8). These vehicles could cause wear on the roads used to access the Project. During construction, the

Project would create approximately 32 trips per day, and during operation up to 50 trips per day. However, implementation of MM TRA-1 would ensure that roads used for construction and operations are restored to the same or better conditions after construction and maintained during operations. Therefore, the impacts would be less than significant with mitigation incorporated.

e) *Construction, O&M, and Decommissioning*. The Project would result in an increase in trips to and from the Project site during construction and operation. This would be approximately 32 daily trips during construction, and 45 daily trips during operation, on average. There could be less trips during operation if the Project injects hydrogen directly into the adjacent, existing SoCal Gas natural gas pipeline, instead of using trucks to export it. Compared to the circulation in the area currently, approximately 26,500 vehicles on the I-10 and SR-177/Rice Road, this would be a miniscule addition and would not cause an effect on circulation. No impact would occur.

f) *Construction, O&M, and Decommissioning*. The Project would not alter the emergency access to the Project site or nearby uses. The access to the Project would be off of Kaiser Road. Kaiser Road is a two-lane local county road. Road and lane closures as part of the Project are not anticipated, but the County emergency service providers and local residents would be notified of any road and lane closures in advance, to prevent issues with emergency access. With MM TRA-1, which requires advanced notification of any road and lane closures, impacts would be less than significant, with mitigation incorporated.

Mitigation:

MM TRA-1 **Vehicle Management Plan.** Prior to construction, a Vehicle Management Plan (VMP) shall be prepared by the Applicant for any construction and operation activities that encroach into the public right-of-way. The VMP shall include measures designed to reduce the impact of temporary construction traffic and any necessary lane or street closure. In addition, the VMP shall include measures to minimize operational trucking impacts to public roadways. Such measures may include but are not limited to providing early notification of closures to the County Fire Department and Sherriff's Departments, residents, and nearby businesses; the use of signage before and during construction activities that clearly delineates detour routes around the lane and street closures; and flaggers to direct traffic in the vicinity of the closure. During operations, trucking can be limited to non-peak hours, if deemed necessary.

If roadways, sidewalks, medians, curbs, shoulders, or other such transportation features are damaged by Project construction activities, as determined by the affected public agency (County and/or Caltrans), such damage shall be repaired and restored to their pre-Project condition by the Project owner. The VMP will also include a description or pictures of the pre-construction conditions of the roadways. At the end of major construction, the Project owner shall coordinate with each affected jurisdiction to confirm what repairs are required. Any damage demonstratable to the Project is to be repaired to the same or better conditions within 60 days from the end of construction, or on a schedule mutually agreed to by the Project owner and the affected jurisdiction, and the road will be maintained during operations.

Monitoring: The County would review the VMP and ensure the measure is implemented.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
38. Bike Trails				
a) Include the construction or expansion of a bike system or bike lanes?	☐	☐	☐	☒

Source(s): Riverside County General Plan (Riverside County 2020a)

Findings of Fact:

a) *Construction, O&M, and Decommissioning*. The Project would not include the construction or expansion of a bike system or bike lanes, therefore, there would be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.19. Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
39. Tribal Cultural Resources				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	☐	☒	☐	☐

Source(s): County Archaeologist, AB52 Tribal Consultation,

Findings of Fact:

a-b) *Construction, O&M, and Decommissioning*. In compliance with Assembly Bill 52 (AB52), notices regarding this project were mailed to all requesting tribes on May 03, 2022. Consultations were requested by the Agua Caliente Band of Cahuilla Indians and the Fort Yuma Quechan Indian Nation. No response was received from Soboba Band of Mission Indians, Ramona Band of Cahuilla Indians, Cahuilla Band of Indians, Morongo Band of Mission Indians, Torres-Martinez Desert Cahuilla Indians, Twenty-Nine Palms Band of Mission Indians, Colorado River Indian Tribe or the Cabazon Band of Mission Indians.

Agua Caliente Band of Cahuilla Indians requested consultation in an emailed letter dated June 10, 2022. A field visit was held by Agua Caliente staff and Riverside County Planning Department. The project report

and conditions of approval were provided to the tribe on June 17, 2022, and the tribe responded that the concerns of the ACBCI THPO have been addressed and consultation was formally concluded.

The Quechan Indian Nation requested to consult in an email dated May 6, 2022. The project documents were sent to the tribe May 18, 2022, and the conditions of approval were sent to them on June 21, 2022. This project was discussed during a meeting held June 27, 2022. The tribe followed up this meeting with an email stating that the tribe was in agreement with the conditions of approval, and that Tribal Monitoring should be a condition of this project and requesting that the Quechan Tribe have a monitor present during ground disturbing activities for the project. Consultation was formally concluded the same day.

Although no specific Tribal Cultural Resources were identified both of the consulting tribes expressed concerns that the project has the potential for as yet unidentified subsurface tribal cultural resources. The tribes request that a Native American monitor be present during ground disturbing activities so any unanticipated finds will be handled in a timely and culturally appropriate manner.

As such, the Project has been conditioned for a Tribal Monitor from the consulting Tribe(s) to be present during grading activities. This will ensure that any Tribal Cultural Resources found during construction activities will be handled in a culturally appropriate manner. In addition, conditions of approval that dictate the procedures to be followed should any unanticipated resources or human remains be identified during ground disturbing activities have been placed on this project. With the inclusion of these Conditions of Approval/Mitigation Measures, impacts to any previously unidentified Tribal Cultural Resources would be mitigated to a level less than significant.

Mitigation:

MM TCR-1 **Unanticipated Resources** The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:

All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis.

Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other.

** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

MM TCR-2 **Native Monitor.** Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing,

tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition.

This agreement shall not modify any condition of approval or mitigation measure.

MM TCR-3 **Artifact Disposition.** Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. Prehistoric Resources- The following treatment shall be applied. a. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded.

MM TCR-4 **Human Remains.** If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.

Monitoring: Monitoring will be conducted by participating tribes. Tribal and cultural monitors will ensure implementation of procedures regarding identification of any potential unanticipated resources or human remains.

5.20. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
40. Water				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☒	☐	☐

Source(s): Project Application Materials, California Department of Water Resources Hydrologic Region Colorado River Chuckwalla Valley Groundwater Basin (CDWR 2004), California Department of Water Resources, Groundwater Management Website (CDWR 2023)

Findings of Fact:

a) *Construction and Decommissioning.* During construction, wastewater generation would be limited to construction workers and would be contained within portable toilet facilities which would dispose of wastewater with the local treatment provider. Water use during decommissioning is expected to be similar to water use during construction.

O&M. During operation, the Project would not generate substantial volumes of wastewater due to the minimal number of full-time or part-time employees, and it would be disposed of within the proposed on-site septic system. The electrolysis process requires that water is demineralized prior to being processed.

A Water Treatment Plant would be included as part of the Project. MM UTS-1, Water Treatment Plan, would ensure that wastewater, including the brine resulting from water treatment, would be disposed of in accordance with local regulations.

The CVGB is an unadjudicated groundwater basin. Owners of property overlying the basin have the right to pump groundwater from the basin for reasonable and beneficial use, provided that the water rights were never severed or reserved. Groundwater production in the basin is not managed by an entity and no groundwater management plan has been submitted to the California Department of Water Resources (CDWR 2023). There is no Urban Water Management Plan for the area, and there is no Integrated Regional Water Management Plan.

During construction, it is anticipated that a total of up to 5.2 acre-feet (1.7 million gallons) of water would be used for dust suppression, truck wheel washing, and other purposes. Water use for decommissioning is expected to be similar to water use during construction. Water used for the Project would be obtained from the on-site well, which the applicant has a permit to drill. The well on site is expected to produce approximately 5,000 gallons per hour. During operation of the Project, it is anticipated that the 50 MW of electrolyzers would use 54,632 gallons of water per day, if they were operated from 9:00 p.m. to 11:00 a.m.

Additionally, during operation and maintenance, approximately 2,000 gallons would be required annually for panel washing performed approximately two times per year, and 18,250 gallons would be required annually for the O&M buildings.

If the Project requires more water than the well can produce during construction or operations, the Project will acquire additional water via on or offsite wells or purchased from other sources. The acquisition of additional water would not cause the relocation or construction of new or expanded water systems.

The Project site is located on flat/low slope desert terrain that is intersected by small local drainageways, which handle stormwater, and no other stormwater management would be needed. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared for the Project, to reduce potential impacts related to erosion and surface water quality during construction activities and throughout the life of the facility.

The Proposed Project would not induce population or other facilities that may place increased demands on these utility services. Impacts will be less than significant with mitigation incorporated.

b) *O&M*. Annual water use during operation of 50 MW of electrolyzers would be up to 0.17 acre-feet (18,018 to 54,632 gallons) per day for 20 hour/day operations, which would be approximately 61 acre-feet (20 million gallons) per year, depending on hours of operation. If the applicant decides to pursue an expansion of the Project, to include 500 MW of electrolyzers, there would be an increase in the amount of water needed. Annual water use during operation of 500 MW of electrolyzers would be approximately 1.7 acre-feet (546,320 gallons) per day, which would be approximately 612 acre-feet (approximately 199 million gallons) per year. See Section 5.10, Impact b, and Mitigation Measure HYD-2, Groundwater Monitoring, Reporting, and Mitigation Plan for a discussion on groundwater supplies.

The applicant proposes to use water from the well on site, but if demand exceeds water supply, water will be purchased from other sources. The well on-site draws from the Chuckwalla Valley Groundwater Basin (CVGB), which has an estimated 15,000,000 acre-feet (over 4 trillion gallons) of recoverable storage capacity (CDWR 2004). Water purchased from other sources would still come from the CVGB. As discussed in Section 5.10.b, Hydrology, with implementation of Mitigation Measure HYD-2, the Project's impact on the CVGB would be less than significant.

Mitigation: MM UTS-1 and HYD-2

MM UTS-1 **Water Treatment Plan.** Prior to operation, the Applicant (in coordination with their contractors) shall prepare a Water Treatment Plan for review and approval by the County of Riverside that includes (but not be limited to) the following information and provisions:

- Responsibilities of the Project Applicant and their contractor(s) with respect to water treatment and disposal of wastewater
- Responsibilities of on-site personnel in charge of overseeing implementation of the Water Treatment Plan.
- Regulatory requirements with respect to brine storage and disposal.

Monitoring: Compliance will be verified through the implementation of mitigation requirements, including required plan and report submittals.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
41. Sewer				
a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	☐	☒	☐	☐
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Source(s): Project application materials

Findings of Fact:

a-b) *Construction and Decommissioning.* Wastewater generation for construction workers would either be contained within portable toilet facilities which would dispose of wastewater with the local treatment provider. Construction is expected to be short term, and therefore would not create a substantial amount of wastewater.

O&M. During operation, wastewater from the minimal number of full-time or part-time employees would be disposed of within the on-site septic system, that will be constructed as part of the Project. The construction of the septic system would not cause significant environmental effects and would be in compliance with Riverside County Department of Environmental Health requirements. The volume of wastewater generated by employees during operation would be minimal and would not impact the capacity of wastewater treatment providers serving the Project site.

Wastewater would be produced in the electrolysis process, and would be disposed of in accordance with local regulations. Impacts would be less than significant with mitigation incorporated.

Mitigation: MM UTS-1

Monitoring: No monitoring is required.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
42. Solid Waste				
a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	☐	☐	☐	☒

Source(s): Riverside County General Plan, Riverside County Department of Waste Services, CalRecycle Integrated Waste Management Plan Enforcement (CalRecycle 2015), Solid Waste Information System Facility/Site Activity Details for Desert Center Sanitary Landfill (CalRecycle 2018).

Findings of Fact:

a-b) *Construction, O&M, and Decommissioning*. Waste generated during construction, operation, and decommissioning of the Project would be limited and is not expected to be at or exceed a level that could impact daily throughput or overall capacity of any landfill or waste disposal facility. Riverside County must comply with the California Green Building Standards Code which includes mandatory recycling. Section 5.408 of the Code requires that 65 percent of the nonhazardous waste be recycled or salvaged for reuse.

Construction materials would be sorted on site throughout construction and transported to appropriate waste management facilities. Recyclable materials would be separated from non-recyclable items and stored until they could be transported to a designated recycling facility in accordance with recycling standards and regulations at the time at completion of construction. It is anticipated that at least 20 percent of construction waste would be recyclable.

Hazardous waste and electronic waste would not be placed in a landfill, but rather would be transported to a hazardous waste handling facility (e.g., electronic-waste recycling). Storage procedures for hazardous materials on site would be dictated by a Hazardous Materials Plan that would be developed prior to construction.

During decommissioning, the Project would comply with the Riverside County Source Reduction and Recycling Element, which is part of the Riverside CIWMP. Applicable materials would be resold or refurbished, then recycled if possible, and the rest of the material would be disposed of in the appropriate scrap or waste facilities.

The closest landfill to the Project is the Desert Center Landfill, located approximately 2.7 miles to the south, off of Kaiser Road, and has a remaining capacity of over 100,000 cubic yards, or 27,000 tons (CalRecycle 2018). The exact amount of solid waste produced during construction, operations and maintenance, and decommissioning is unknown, however, it can be estimated using average amounts of waste produced by similar projects. For every 1 MW of solar installed, it is estimated than an average of 4.65 tons of waste are produced during construction. However, when best practices for waste management are followed, including prioritizing recycling and material recovery, an average of 3 tons of waste can be diverted from landfills, and instead recycled or salvaged, which results in a rate of 1.65 tons per MW of solar (Green Clean Solar 2023). There is no estimate for amount of waste produced for electrolyzers. Based on the acreages developed per type of technology, the solid waste amount was adjusted. The site would have solar panels on approximately 90 percent of the site (120 acres), and electrolyzers on the other 10 percent (13 acres), therefore, the amount of solid waste was estimated for 50 MW of solar, plus 10%.

The Project proposes to install 50 MW of solar, and 50 MW of electrolyzers, eventually expanding to 500 MW of electrolyzers. For 50 MW of solar, 232.5 tons of solid waste would be produced. To estimate the amount of waste produced for the electrolyzers, 10 percent was added, resulting in approximately 255.75 tons of solid waste. After expansion to 500 MW of electrolyzers (which would increase the acres developed), approximately 511.5 tons of solid waste would be produced, before implementation of best practices for waste management. Additionally, not all of this waste would be created at once, as the expansion of the Project would take place at a later time.

Given that the Project would implement best practices and comply with all Riverside County regulations related to solid waste and recycling, these amounts of solid waste would be reduced to 90.75 tons and 181.5 tons of solid waste, respectively. Given the difference in magnitude between the amount of waste produced (up to 181.5 tons), and the capacity of the Desert Center Landfill (27,000 tons) there is ample capacity to accommodate the waste generated by the project. Therefore, solid waste generated during construction, operations and maintenance, and decommissioning of the Project would be properly disposed of in a manner that complies with federal, state, and local management.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
43. Utilities				
a) Electricity?	☐	☐	☒	☐
b) Natural gas?	☐	☐	☒	☐
c) Communications systems?	☐	☐	☐	☒
d) Street lighting?	☐	☐	☐	☒
e) Maintenance of public facilities, including roads?	☐	☐	☐	☒
f) Other governmental services?	☐	☐	☐	☒

Source(s): Project Application Materials, The Riverside County General Plan Safety Element, Desert Center Area Plan (Riverside County 2021a and 2021b_.

Findings of Fact:

a-f) *Construction, O&M, and Decommissioning*. The Project includes installation of a solar facility and a hydrogen production facility. After construction, there would be up to 10 employees at the site for operation and maintenance. This would create a small increase in demand for public utilities (i.e., electricity, communications systems or other government services). However, the number of employees at the site would be minimal compared to the current population of the area. Since the increase in demand would be very small, there would be no construction or expansion of such facilities due to the Project.

The Project may require additional energy to produce hydrogen. 50 MW of electrolyzers would be powered by on-site solar. If additional electrolyzers are added, the additional energy would be acquired from other renewable energy sources near the Project. This would increase the energy consumed by the Project, but the increase would not induce construction or relocation of electricity services.

The Project layout was designed based upon County requirements for safety setbacks from utilities, including present and potential future electrical transmission lines, natural gas pipelines, telephone and water lines, roads and other public utilities. The Project could choose to inject hydrogen directly into an

adjacent, existing SoCal Gas natural gas pipeline. Confirmation of the required utility setbacks will be conducted during the building permit process.

To avoid contact or damage to buried wet and dry utilities, the construction contractor is required to contact "Dig Alert" (Underground Service Alert of Southern California) prior to the start of ground disturbing activities to ensure that pipelines are properly located.

The Project Applicant would also be required to secure all appropriate amendments to rights-of-way or corresponding instruments from the Southern California Gas Company, MWD, SCE, and other utilities. Utility easements of record would be observed and unauthorized disturbance would be prohibited by law. The project shall also comply with conditions of approval such as AND Planning.14-No Connect w/o Final. Therefore, impacts associated with utilities would be less than significant.

The Project would use public roads to access the site and would use access roads within the ROW. The Project would not be required to improve any public roads.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.21. Wildfire

If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
44. Wildfire Impacts				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☒	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☒	☐	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☒	☐	☐

Source(s): GIS database, Project Application Materials, Desert Center Area Plan, Figure 9 "Wildfire Susceptibility Map," and Figure 12, "Slope Instability Map." (Riverside County 2021)

Findings of Fact:

a) *Construction and Decommissioning.* The Project would require the use of Interstate 10, Rice Road/SR-177, and Kaiser Road to transport construction equipment and materials. The Project would be accessed via Interstate 10 and Kaiser Road. Accessing the Project site from Interstate 10 requires travelling approximately 7 miles on Kaiser Road, a local roadway. The majority of vehicle and truck transport would

be standard sized and would not result in blockages of local roadways. Kaiser Road is not known to be part of an adopted or designated emergency evacuation route or plan.

O&M. During operation of the Project, hydrogen could be exported from the project site via tube trailers, or injected directly into an adjacent, existing SoCal Gas natural gas pipeline. If the Project used trucks to export hydrogen, there would be approximately 20-30 of these truck trips a day. An additional 30 truck trips a day on Interstate 10 corresponds to a 0.3% increase in daily trips. This small increase would not affect traffic in a way that would substantially impair an adopted emergency response plan or evacuation plan. With incorporation of MM FIRE-1, access for emergency vehicles would be ensured. For additional information on traffic impacts, see Section 5.18. Therefore, impacts would be less than significant with mitigation incorporated.

b) *Construction, O&M, and Decommissioning*. The Project is located in a region with high wildfires risk due to the presence of dense, dry fuels, paired with a warm and arid climate. However, areas of very high and high wildland fire susceptibility within the Desert Center Area correspond with areas of steep slope. The Project site has slopes ranging from 1% to 3%. With incorporation of MM FIRE-1, fire risk would be reduced due to the implementation of the Fire Management and Prevention Plan, which includes a vegetation management plan. Therefore, impacts would be less than significant with mitigation incorporated.

c) *Construction, O&M, and Decommissioning*. The Project would include the installation of a solar facility and hydrogen production facility, and SCE tie-in and SoCal Gas stub pipeline. The approach to fire prevention and defense includes both facility design and planned construction and operational activities. Although the solar facility is located in a remote desert setting and is not within a high or very high Fire Hazard Severity Zone, the electrical components could pose a small risk of fire if they become damaged or are tampered with. The Project is located in a sparsely vegetated and remote location away from densely populated areas. Therefore, the potential for faulty electrical equipment to substantially exacerbate fire risks for populated areas is minimal. Additionally, assembly and installation of the electrical equipment would meet existing electrical and safety standards.

The cleared access roads on the Project site could act as a firebreak. MM FIRE-1 requires vegetation management and other measures to prevent fires. The maintenance of the facility, including vegetation management, maintenance of power lines and access roads, will prevent fires and benefit fire response to a wildfire event. Construction, decommissioning, and operation of the Project would not directly require new or expanded infrastructure that may exacerbate fire risks. Therefore, impacts would be less than significant with mitigation incorporated.

d) *Construction, O&M, and Decommissioning*. The Desert Center Area Plan's Slope Instability Map shows that the Project is in an area that has no susceptibility to seismically induced landslides and rockfalls. The slopes in the Project site and surrounding area range from 1% to 3%.

The Project does not include extensive grading, excavation, or new structures that would significantly alter soil stability. The Project site is vacant desert land, on flat terrain in a warm and arid climate. The site has small, local drainageways. The Project does not propose any changes that would substantially change drainage that could cause flooding or erosion. Therefore, the Project would not increase the risk of flooding after a wildfire compared to existing conditions. Less than significant impacts would occur.

e) *Construction, O&M, and Decommissioning*. The Project is located in a warm, arid climate with moderate fire risks. According to the Riverside County Desert Center Area Plan Figure 9, the Project site is within a moderate local responsibility area. During construction, fires could be caused by a variety of factors, including vehicle exhaust, parking on dry vegetation, sparks associated with grading or welding activities, and the overall increase in human activity.

Consequences of a fire could be severe depending on the weather conditions and the availability of on-site firefighting personnel to quickly respond to the fire. Fires could happen as a result of accidental

ignition, which depending on the location, could spread. If noticed by the equipment operator or other construction officer, small fires can be suppressed by on-site equipment and designated fire-watch personnel. All construction equipment is required to have fire suppression equipment on board or on site, to ensure the availability of an adequate onsite supply of water with all-weather access for fire-fighting equipment and emergency vehicles. MM FIRE-1 includes measures to mitigate fire risk by preventing ignition sources, having fire suppression materials on site, and having a fire response plan. Less than significant impacts would occur with mitigation incorporated.

Mitigation:

MM FIRE-1 **Construction, Operation, and Decommissioning Fire Management and Prevention Plan.** Prior to construction, the Applicant (in coordination with their contractors shall prepare a Fire Management and Prevention Plan for review and approval by the Riverside County Fire Department (RCFD) that includes (but not be limited to) the following information and provisions:

- Responsibilities of the Project Applicant, their contractor(s), and RCFD with respect to fire prevention and inspection of work areas.
- On-site personnel in charge of overseeing Fire Plan implementation.
- Construction staff and equipment that can be used for fighting fire.
- Emergency measures for construction curtailment.
- Provisions for fire/emergency services access if roadway blockage during construction and operation.
- Cleared, maintained worker parking and construction staging areas shall be designated; no parking or construction activities shall be allowed in non-designated areas.
- Smoking and open fires shall be prohibited at the Project site during construction and operations. A copy of the notification to all contractors regarding prohibiting smoking and burning shall be provided to the RCFD.
- Assurances that all internal combustion construction equipment shall be equipped with appropriate spark arrestors and carry fire extinguishers.
- A fire watch with appropriate firefighting equipment shall be available at the Project site at all times when welding activities are taking place. Spark producing activities (such as welding and metal cutting) shall not occur when sustained winds exceed limits set forth by the RCFD.
- Appropriate hot work permits/approvals (for activities such as welding and metal cutting) shall be obtained from the jurisdictional fire agency.
- All construction activities shall be curtailed in the event of a fire or when fuel and weather conditions get into the “very high” and “extreme” ranges (Red Flag Warning), as deter- mined by the National Weather Service. Any specific Project-related activities to be allowed during very high or extreme weather conditions would be at the discretion of the RCFD.
- A vegetation management plan to address vegetation clearance around project compo- nents; and plans for regularly scheduled brush clearance of vegetation on and adjacent to all access roads, power lines, and other facilities. All vegetation clearance and fire breaks shall be consistent with federal and State requirements, whichever is most stringent.

- Means for ensuring on-site operational fire water supply (i.e. a functioning well or storage tank) is available prior to operation.
- Procedures for Supervisory Control and Data Acquisition (SCADA) system (or other constant monitoring equipment) providing immediate notifications to emergency fire services.
- For hydrogen facilities, follow the published guidance of the U.S. Department of Energy for fire management and prevention.
- Response to accidents involving downed power lines, damage to solar arrays, and all hydrogen related equipment.
- By December 31 of each operational year, the applicant shall provide a report to Riverside County Planning and Fire that summarizes ongoing fire abatement measures, results of RCFD inspections, any fires onsite, and any adaptive measures to further minimize fire risk.

Monitoring: Compliance will be verified through the implementation of mitigation requirements, including required plan and report submittals.

5.22. Mandatory Findings of Significance

Does the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
45. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Source(s): Staff Review, Project Application Materials

Findings of Fact:

Implementation of the proposed Project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

The Project is bordered by Kaiser Road and an adjacent existing solar development (Desert Sunlight). Additional solar developments, either constructed or in-construction, are located in the vicinity of Project to the southeast. Lands in the vicinity of the Project are previously disturbed and converted, and the Project would not substantially reduce the habitat of a fish or wildlife species. After construction, native vegetation will be allowed to recover from seed banks and root stocks wherever facilities do not require permanent vegetation removal (such as under solar arrays). Permanent impacts to jurisdictional waters would be compensated as required by mitigation as described in the Biological Resources section. Wildlife populations would not drop below self-sustaining levels as a result of habitat loss. Because vegetation communities would be restored or replaced, the Project would not threaten to eliminate a plant or wildlife

community. The Applicant would ensure the Project is consistent with laws, regulations, and Project permits. Mitigation Measures, as described in Section 5.4, would protect sensitive biological resources including threatened and endangered and special-status species, and their numbers and ranges would not be restricted. Design measures including vegetation and invasives management and minimization of night lighting will further protect wildlife species and their habitat from disturbance and degradation. With avoidance and minimization through Project design and implementation of mitigation measures, the Project would not degrade the quality of the environment or reduce the habitat and populations of fish and wildlife species.

No CRHR listed or eligible resources are located within the Project site. However, previously unknown buried resources could be uncovered, damaged, or destroyed during decommissioning or construction-related ground-disturbing activity, which would be considered a potentially significant impact. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce such potential impacts to unknown historical resources to a less than significant level.

Cultural resources surveys have been completed and Native American tribes have been consulted. There are no known TCRs located within the Project site and no known TCRs within one mile of the Project site's boundary and therefore, no significant impacts to TCRs are anticipated.

Does the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	☐	☒	☐	☐

Source(s): Staff Review, Project Application Materials

Findings of Fact:

CEQA requires lead agencies to consider the cumulative impacts of proposed projects under review. A project may result in significant adverse cumulative impacts when its effects are cumulatively considerable; that is, the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects regardless of what agency or person undertakes such other actions (Section 15130(a)(1)).

Under CEQA, there are two acceptable and commonly used methodologies for establishing the cumulative impact setting or scenario: the "list approach" and the "projections approach." The first approach would use a list of past, present, and probable future projects producing related or cumulative impacts. (Section 15130 (b)(1)(A)). The second approach is to use a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. (Section 15130 (b)(1)(B)).

The "list" approach was selected. As used in the analysis of cumulative impacts, the term "cumulative scenario" is used to include the proposed Project and other identified projects whose impacts have the potential to combine with or overlap with those of the Project.

Cumulative Projects. Projects used in the cumulative impact analysis are listed in Table 10 and Table 11 and shown on Figure 4. The projects considered in this analysis are within the Desert Center area and are part of the BLM DRECP and Riverside County regional planning efforts.

Desert Center Area Plan. As part of the Riverside County General Plan Update (2015), the County updated the Desert Center Area Plan. The Desert Center Land Use Plan reflects the limited development potential in this region. The Area Plan designates most of the area Open Space-Rural, with some agriculture, rural residential, and other low-density residential and commercial opportunities. The Area Plan notes that future development on the private land should focus on infill and contiguous expansion of the existing communities at Desert Center and Lake Tamarisk but is likely to be limited (Riverside County 2015a). This information was taken into consideration by the authors when drafting the cumulative analysis, as it indicates limited development on private land.

Cumulative Analysis. This section discusses whether the Project would result in cumulatively considerable significant short-term or long-term environmental impacts when combined with other past, present, and reasonably foreseeable future projects in the area. Short-term impacts are generally associated with construction of the Project, while long-term impacts result from ongoing O&M of the Project.

The Project would have no impact to Agriculture and Forestry, Energy, Land Use and Planning, Mineral Resources, Population and Housing, and Recreation so would not contribute to cumulative impacts on these resources. For Aesthetics, Air Quality, Geology and Soils, Greenhouse Gases, Hydrology and Water Quality, and Noise, the Project would result in less than significant effects and would not contribute to a cumulatively considerable impact. For the following issue areas, the Project would result in a less than significant impact with mitigation. The Project's contribution to cumulative impacts for these issues areas is described below.

Biological Resources. The geographic extent for this cumulative analysis includes activities and projects in the desert portion of Riverside County (Palm Springs to the Colorado River) because it consists of similar habitat areas and encompasses the home ranges of species such as those that would be directly or indirectly affected by the proposed Project (see Figure 4). Cumulative effects for biological resources apply to both plant and wildlife species and must consider distribution, habitat availability, designated critical habitat, local rarity or commonness, and likely responses to projects' effects for each species.

From a timing perspective, the project could contribute to cumulative effects to biological resources starting with the initiation of on-site activities and continuing throughout O&M, through final decommissioning.

As the number of solar projects and other development and land use changes increase in the region, the cumulative impacts to biological resources, such as habitat loss also increase. This analysis considers the current and foreseeable future projects identified in the cumulative scenario, listed in Tables 10 (Past or Present Projects or Programs in the Project Area) and 1 (Probable Future Projects in the Project Area).

This analysis presumes that MMs BIO-1 through BIO-9, identified in Section 5.4 to mitigate the Project's impacts to biological resources, would be implemented. Design measures including vegetation and invasives management and minimization of night lighting will further protect wildlife species and their habitat.

Cumulative impacts of the projects identified in the cumulative scenario to biological resources, as described below by resource type, would be cumulatively significant. With avoidance through Project design and implementation of mitigation measures, the Project contribution to cumulative impacts would not be considerable.

Table 11. Past and Present Projects or Programs in the Project Area

Project Name	Location	Ownership	Status	Acres	Project Description
West-wide Section 368 Energy Corridors	Riverside County, parallel to I-10	BLM, DOE, U.S. Forest Service	Approved by BLM & USFS, additional review of Region 1 ongoing	N/A	Designation of corridors on federal land in the 11 western states, including California, for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities (energy corridors). One of the corridors runs along the southern portion of Riverside County.
Desert Sunlight Solar Project	6 miles north of Desert Center	NextEra	Operational	4,400	A 550 MW solar PV project located on BLM land. The project includes a 230 kV transmission line that extends south from the site to interconnect with the Red Bluff Substation
SCE Red Bluff Substation	Southeast of Desert Center	SCE	Operational	75	220/500 kV substation to interconnect renewable projects near Desert Center to the Devers–Palo Verde (DPV) transmission line.
Devers–Palo Verde No. 1 Transmission Line	Palo Verde, Arizona, to Devers Substation near Palm Springs	SCE	Operational	N/A	Existing 500 kV transmission line parallel to I-10 from Arizona to the SCE Devers Substation, near Palm Springs. DPV1 loops into the SCE Colorado River Substation which is located 10 miles southwest of Blythe.
Devers–Colorado River Trans-mission Line	From Blythe to Devers Substation near Palm Springs	SCE	Operational	N/A	Existing 500 kV transmission line parallel to the I-10 from the SCE Colorado River Substation to the Devers Substation. ROW requires 130 feet on federal, state, and private land.
Blythe Energy Project Trans-mission Line	From Blythe to Julian Hinds Substation	Blythe Energy, LLC	Operational	N/A	Existing 230 kV transmission line.
Desert Harvest Solar Project	North of Desert Center	EDF-RE	Operational	1,208	A 150 MW solar PV project located immediately south of the Desert Sunlight project. The gen-tie route would parallel the existing Desert Sunlight line to interconnect with the existing SCE Red Bluff Substation.
Palen Solar Project	East of Desert Center	EDF-RE	Operational	3,400	A 457 MW solar PV and energy storage facility located 11 miles east of Desert Center on BLM-administered land. Includes a 6-mile gen-tie line that connects into SCE Red Bluff Substation.
Athos Renewable Energy Project	Desert Center	Soft Bank Energy	Approved by Riverside County and BLM in 2019. Operational	3,400	A solar PV and energy storage facility project located on private land in unincorporated Riverside County. Portions of the gen-tie line cross public land to reach the SCE Red Bluff Substation.

Project Name	Location	Ownership	Status	Acres	Project Description
Oberon Renewable Energy Project	Northeast of Desert Center	IP Oberon, LLC	Approved by BLM in January 2022 and RWQCB in December 2021. Construction completed and operational as of December 2023.	5,000 (application area) 2,600 (available for development)	A 500 MW solar PV and energy storage facility on BLM - administered land. A 0.5-mile 500 kV gen-tie line would connect into SCE Red Bluff Substation.
Victory Pass Solar Project	4.5 miles east of Desert Center, adja-cent to north side of I-10	Clearway Energy Group, LLC	Approved by BLM in December 2021. Construction com-pleted. Operational as of March 2024.	1,800	A 200 MW of solar energy with up to 200 MW of battery storage on BLM- administered land. A shared overhead 230 kV gen-tie line with Arica Solar Project connects to SCE Red Bluff Substation.
Arica Solar Project	Adjacent to north side of Victory Pass project, 5 miles east-northeast of Desert Center	Clearway Energy Group, LLC	Approved by BLM in December 2021. Construction com-pleted. Operational as of March 2024	2,000	A 265 MW solar PV project with up to 200 MW of battery storage. A shared overhead 230 kV gen-tie line with Victory Pass Solar Project connects to SCE Red Bluff Substation.

Source: BLM, Riverside County, 2023.

Table 12. Probable Future Projects in the Project Area

Project Name	Location	Ownership	Status	Acres	Project Description
Desert Southwest Transmission Line	118 miles primarily parallel to the Devers–Palo Verde 500 kV line	Imperial Irrigation District	Final EIR/EIS prepared in 2005, approved by the BLM in 2006	N/A	Approximately 118-mile 500 kV transmission line from a new substation near the Blythe Energy Project to the existing Devers Substation located 10 miles north of Palm Springs, California.
Eagle Mountain Pumped Storage Project	Eagle Mountain iron ore mine, north of Desert Center	Eagle Crest Energy Company	FERC License issued June 2014. Project approved by BLM in August 2018. On April 12, 2022, FERC issued an order granting an extension of project construction deadlines to commence project construction by June 19, 2024, and the extended deadline to complete project construction is June 19, 2027.	90	1,300 MW pumped storage project designed to store off-peak energy to use during peak hours. The off-peak energy would be used to pump water to an upper reservoir. The water is released to a lower reservoir through an underground electrical generating facility.
Sapphire Solar Project	Adjacent to Easley Project; northeast of Desert Center	EDF-RE	Under review by BLM (CACA 59623) and Riverside County in 2022.	1,140	The project on private would generation 117 MW of solar energy. The gen-tie line would cross BLM-administered land to connect into the Desert Harvest Substation/Red Bluff Substation.
Redonda Solar Project	East of Desert Center	Clearway Energy Group, LLC	Under review by BLM in 2022 (CACA 059387).	3,483	The project on BLM-administered land would generate 250 MW of solar PV energy and connect into Arica and Victory Pass Substation.
Easley Renewable Energy Project	North of I-10, north of Desert Center, west of the Athos Renewable Energy Project	Intersect Power, LLC	Under review by BLM (CACA _ 57822) and Riverside County in 2024.	3,727	The project on private and BLM- administered land would generate 650 MW of solar PV and have 650 MW of battery storage and would connect to the Oberon Project Substation.

Source: BLM, Riverside County, 2023.

Vegetation and habitat. Construction-related impacts of the cumulative projects would temporarily increase noise and activities, dust, and other habitat disturbances throughout the region. On completion of construction, longer-term land use conversion would contribute to reduced habitat availability and increased habitat fragmentation. In the context of the number of past, present, and future projects many of which are large solar projects, the effects of the proposed Project would contribute incrementally to the cumulative significant impacts to vegetation and habitat; however, the Project's contribution would be minor (0.4%) given that the Project site is 133 acres in comparison to the cumulative project total of approximately 30,000 acres. The loss of natural habitats that would result from the Project would be offset by acquiring offsite compensation lands.

Sensitive Habitat and Jurisdictional Waters of the State. The proposed Project would impact unvegetated ephemeral dry wash, which meets criteria as jurisdictional waters of the State. Many of the cumulative projects would have qualitatively similar impacts to unvegetated ephemeral dry wash due to the nature of the area and the large washes that cross the area, resulting in a significant cumulative impact. The effects of the proposed Project would contribute incrementally to the cumulative impacts to sensitive habitat and jurisdictional waters of the State; however, the Project's contribution would be minor (0.4%) given that the Project site is 133 acres in comparison to the cumulative project total of approximately 30,000 acres. Further, implementation of Mitigation Measure BIO-9 would reduce the impacts so that residual effects would be minimal.

Special-status plants. The proposed project could affect special status plants; however, no threatened or endangered plants were identified on the site. As described in Section 5.4, several widespread special-status plants could be affected but were not observed. The past, present, and future projects would have similar or greater impacts to special-status plants which would result in a cumulatively significant impact to regional special-status plants. The contribution of the Project would not be considerable because of the limited number of special-status plants on site and the mitigation presented in Section 5.4 to avoid, minimize, and offset the impacts to rare plants. Residual effects would be minimal.

Desert tortoise. Suitable habitat is present throughout the cumulative project area, including USFWS-designated critical habitat; however, no desert tortoises were observed on the project site, but one inactive Class 4 burrow (possibly desert tortoise, good condition) and one inactive Class 5 (possibly desert tortoise, deteriorated) burrow were observed on the Project site. The Project site is not located within designated desert tortoise critical habitat. Most of the past, present, and foreseeable future projects in the vicinity would impact desert tortoise habitat and many of them could directly affect desert tortoises. Due to the number and size of the cumulative projects they would result in a cumulatively significant impact; however, the Project's contribution would be minor (0.4%) given that the Project site is 133 acres in comparison to the cumulative project total of approximately 30,000 acres. Mitigation measures identified in Section 5.4 would prevent lethal take of desert tortoise and avoid, minimize, and offset impacts to its habitat. The project's contribution to cumulative impacts to desert tortoise and its critical habitat would not be considerable.

Native birds, including special-status passerine birds. Migratory birds are expected to occur throughout the cumulative project area during construction and O&M. Land use conversion for the Project and any of the cumulative projects would result in habitat loss and degradation, displacement, decreased foraging activities, and potentially disruption or failure of nesting, increased predation, or mortality. Solar panels of the proposed Project as well as other solar PV projects may cause collision hazards, such as a "lake effect," leading to bird mortality. Taken together, the projects would result in a cumulatively significant impact for native birds.

The proposed Project's impacts would be mitigated through pre-construction surveys, avoidance of active nests, and implementation of O&M phase adaptive management, depending on monitoring results of neighboring solar projects, as described in MM BIO-7 (Bird and Bat Protection). Natural habitat loss would

be minimized and offset through mitigation measures identified in Section 5.4. The incremental contribution of the proposed Project to the cumulative impacts to native bird habitat and nesting success would not be considerable because pre-construction nesting bird surveys would be performed, and native habitat loss would be offset. With implementation of the Project's mitigation measures, the contribution to cumulative impacts to native bird populations from the proposed solar facilities would not be considerable.

Special-status raptors, including golden eagle. No special-status raptors, except for burrowing owl, are expected to nest on the solar facility site due to a lack of suitable habitat. However, the site provides suitable seasonal or year-round foraging habitat for several raptor species and is within potential foraging distance of known golden eagle nesting territories. Several raptors are likely to forage infrequently on the solar facility site at any time of year, including winter and migration seasons. Effects of the other projects in the vicinity would be similar to potential effects of the proposed Project. Cumulatively, these projects could result in significant impact due to habitat loss. The incremental contribution of the proposed Project to the cumulative impacts to special-status raptors, including habitat and collision morality, would not be considerable because native habitat loss would be offset, and potential collision would be mitigated as described above for native birds.

Desert kit fox and American badger. During 2022 fall surveys one inactive kit fox burrow was encountered and no burrow were identified for American badger. Both species are expected to occur on the cumulative project sites and loss of the habitat and prey species could result in a significant cumulative impact. Mitigation measures in Section 5.4 would offset habitat loss for both species and prevent or minimize wildlife injury and mortality and require pre-construction surveys to exclude both species from work sites. The incremental contribution of the proposed Project to the cumulative impacts to these species would not be considerable because of the low potential for the individuals to occur and if observed individuals would be allowed to leave on their own accord or relocated out of harm's way to an off-site location in coordination with the wildlife agencies. In addition, native habitat loss would be offset. The Project's contribution to cumulative impacts to desert kit fox and American badger populations would not be considerable.

Cultural. Of the cultural resources are located on the Project site, none are eligible for the CRHR or NRHP, and no known unique archeological resources are present. As described in Section 5.5, the Project will implement measures to minimize impacts to resources that may be discovered during construction. Because of this, the Project's contribution to cumulative impacts to cultural resources would not be considerable.

Hazards and Hazardous Materials. Impacts due to hazards and hazardous materials are localized in nature and unlikely to combine with impacts of other projects unless in the immediate vicinity. The Project would involve the storage, use, disposal, and transportation of hazardous materials to varying degrees during construction and operation. Impacts from these activities would be less than significant because the storage, use, disposal, and transportation of hazardous materials are extensively regulated by various federal, State, and local laws, regulations, and policies. It is foreseeable that the Project and other cumulative projects would implement and comply with these existing hazardous materials laws, regulations, and policies. In addition, the implementation of Mitigation Measure TRA-1 would ensure that emergency service providers and local residences are notified in advance of any temporary lane closures. Therefore, the incremental contribution of the Project to cumulative impacts would not be considerable.

Paleontological Resources. The record search, literature review, and the survey did not indicate the presence of paleontological resources within the Project area. However, Quaternary alluvium in the general area and adjacent property have produced a number of fossil localities despite these deposits being mapped as Holocene-age alluvium, which would normally be considered to have low sensitivity. On the surface there is low potential for fossil recovery, but with increasing depth, 3-feet below the surface or

deeper, the potential for presence of fossils increases. As described in Section 5.14, the Project will implement measures to minimize impacts to resources that may be discovered during construction. Because of this, the Project's contribution to cumulative impacts to paleontological resources would not be considerable.

Public Services, Fire. The Project site is located within a State Responsibility Area, mapped as a Moderate Fire Hazard Severity Zone. Some parcels of land surrounding the Project area are either not within a State Responsibility Area or are mapped as Moderate. Emergency response via the fire department could be required at the Project site in the event of an accident during construction or operations. The Project will not induce an increase in population that would require additional fire protection. As required by Mitigation Measure FIRE-1, a comprehensive Fire Management and Prevention Plan will be prepared and implemented for construction, operation, and decommissioning of the Project to identify the fire hazards and response scenarios that may be involved with operating the facility. With the implementation of the Plan, the Project's contribution to cumulative impacts to fire services would not be considerable.

Transportation. The vehicles used for construction of the Project would be light and medium heavy-duty trucks (Class 6). Operations would use light and heavy-duty trucks (Class 7 or 8). These vehicles could cause wear on the roads used to access the Project. However, implementation of Mitigation Measure TRA-1 would ensure that roads used for construction and operations are restored to the same or better conditions after construction and maintained during operations.

The Project would result in a small increase in trips to and from the Project site during construction and operations, where approximately 32 daily trips would be required during construction and 45 daily trips during operation, on average. These Project related trips are nominal in comparison to the larger cumulative solar projects that are expected to average up to 500 trips per day during construction. Operational trips would be comparable. Further, the access to the Project would be off of Kaiser Road. Kaiser Road is a two-lane local county road that no future cumulative project would use during construction. Road and lane closures as part of the Project are not anticipated, but the County emergency service providers and local residents would be notified of any road and lane closures in advance, to prevent issues with emergency access as required by Mitigation Measure TRA-1. With the implementation of Mitigation Measure TRA-1, the Project's contribution to cumulative impacts to transportation would not be considerable.

Tribal Cultural Resources. Tribal concerns have been expressed through the AB52 consultation process for which the Project has been conditioned to include tribal monitoring and procedures for identified unanticipated discoveries and human remains, should they occur. The cumulative projects in the Desert Center area are expected to have the same or similar guidelines. Because of this, the Project's contributions to cumulative impacts to tribal cultural resources would not be considerable. As described in Section 5.8, the Project will implement measures to minimize impacts to resources that may be discovered during construction. Because of this, the Project's contribution to cumulative impacts to cultural resources would not be considerable.

Wildfire. Cumulative risk of fire depends on the combined short-term and long-term potential to start a fire or impede firefighting. The proposed Project will reduce the risk of fire compared with baseline given vegetation removal and management practices, and implementation of fire prevention measures. O&M activities would occur within a portion of the site cleared of vegetation and fire suppression equipment would be available on site. The Construction, Operation, and Decommissioning Fire Management and Prevention Plan to be prepared under Mitigation Measure FIRE-1, will define the specific fire management protocols for the Project site. Therefore, the incremental contribution of the Project to cumulative fire impacts would not be considerable.

Does the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Source(s): Project Application Materials

Findings of Fact: As noted throughout the Initial Study, with mitigation, the proposed Project would not result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly. The Project is located 330 feet away from the nearest receptor, and noise levels from construction at any time would be below the threshold as set by ordinances as acceptable. In addition, operation of the hydrogen electrolyzers would not generate noise levels at the nearest receptor 45 dB or above. The project would be required to comply with air district standards, including use of equipment that meets specific emission standards. Dust (particulate matter) has the potential of affect human health. The effects of fugitive dust would be less than significant with implementation of BMPs for fugitive dust control as required by the SCAQMD which will mitigate the effect of fugitive dust on humans. In addition, most construction would be short-term and would occur in locations remote from residences, schools, and other sensitive receptors. Seismic impacts on workers during construction would be less than significant, and the project would not exacerbate existing seismic conditions. Hazards impacts would be less than significant. During construction, the Project would be required to have a Hazardous Materials Business Plan (HMBP) which contains information regarding the presence and storage of hazardous materials on site to prevent spills and ensure safety. The Project would not alter emergency evacuation or access in the Project area. The required Vehicle Management Plan, Mitigation Measure TRA-1, would require early notification of closures to emergency services providers and residences. Mitigation Measure FIRE-1 would require the preparation and implementation of a Construction, Operation, and Decommissioning Fire Management and Prevention Plan to reduce risk to property and humans. Project impacts would be less than significant.

6. Earlier Analyses

None used for this project site.

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