

**To:** Office of Planning and Research  
 PO Box 3044  
 1400 Tenth Street, Room 113  
 Sacramento, CA 95812-3044

**From:** California Energy Commission  
 1516 Ninth Street, MS-48  
 Sacramento, CA 95814

**Project Applicant:** Rincon Band of Luiseño Indians

**Project Title:** Rincon Long Duration Multi-Storage Solar Microgrid

**Project Location – Specific:** 777 Harrah’s Rincon Way

**Project Location – City:** Valley Center 92082      **Project Location – County:** San Diego

**Description of Nature, Purpose and Beneficiaries of Project:**

The Rincon Band of Luiseño Indians is a federally-recognized Native American Tribe. The project will take place entirely on land that is self-governed by the Rincon Band of Luiseño Indians. The Rincon Band of Luiseño Indians conducted an Environmental Evaluation Addendum to the Harrah’s Rincon Casino and Resort pursuant to Tribal Environmental Policy Ordinance under Section 8.400 of the Rincon Tribal Code, which requires a detailed report on the environmental impacts of the proposed action that is in substantial compliance with the requirements set out in the National Environmental Policy Act.

The purpose of this project is to install and operate a renewable energy microgrid system that reduces electricity consumption and greenhouse gas (GHG) emissions, ensures reliability, and reduces operating costs at the Harrah's Rincon Casino and the Rincon Reservation located in the City of Valley Center, California. The project will occur within the existing developed area of the Rincon Reservation and is located within the central portion of the reservation. The microgrid system consists of a 2 megawatt (MW) solar photovoltaic (PV) carport system, a 4.8 megawatt-hour (MWh) flywheel energy storage system (ESS), and a 4.8 MWh vanadium redox flow battery (VRFB) ESS with electrical infrastructure upgrades and microgrid controls. Both ESS technologies can support up to 12 hours each (24 hours combined) of islanded off-grid operation. Existing electrical infrastructure at the casino and resort, wastewater treatment plant, gas station and convenience store, office storage building, and 1 MW solar field will be modified to integrate the new energy systems.

The solar PV carport system will involve installation of steel carport structures mounted on new concrete pilings within an existing parking lot for a total installed area of approximately 6.75 acres. The carport structures will be approximately 20 feet tall. Solar PV arrays will be mounted on top of the carport structures. Any potential glare from the installation of the solar PV carport structures will be minimal and similar to the existing solar facilities currently onsite. The flywheel ESS will involve the installation of 150 flywheel containment units. Flywheel containment units will be placed between solar arrays within existing ground-mounted solar fields that are located north of the solar PV carport system. Each flywheel unit is 5 feet by 10 inches in diameter and will be installed approximately 6 feet deep into the ground. The flywheel ESS will not be visible from on or off-reservation vantage points because all containment units will be buried between solar arrays within an existing solar field. The VRFB ESS will be installed next to the existing solar fields on a new concrete pad that will be approximately 1,165 square feet. The VRFB units measure 8 feet tall and may be stacked for a maximum height of 16 feet. The VRFB ESS will be located within the same parcel as the existing solar fields (APN 133-270-1500). The solar PV carport system, flywheel ESS, and VRFB ESS will be wired through 1,600 feet of underground conduit and connected to a microgrid controller. All trenching will occur entirely within previously disturbed and developed areas. These three systems will enable the facility to operate essential components in case of a power outage. The project will take place entirely within the existing casino and reservation boundary and all materials will be installed outdoors.

The project will require 30 to 60 construction workers and will take approximately one year to complete. During construction the project will require a total of 155 truck trips for material deliveries and 1,500 construction worker trips. A construction parking and staging area will be provided on site within an existing storage lot, located

Authority cited: Sections 21083 and 21110, Public Resources Code. Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

adjacent to the AC solar PV carport system (APN 133-180-1400). The VRFB ESS and flywheel ESS work area will be accessed by West Tribal Road, while access to the solar PV carport system and parking and staging area will be provided by Arviso Road. Any new sources of air emissions resulting from the construction of the project would be temporary and intermittent in nature and would not significantly affect onsite or offsite air quality. Stormwater collected from surface runoff would be managed with the current stormwater infrastructure in place and in accordance with current federal stormwater management practices. Furthermore, best management practices (BMPs) (such as a dust suppression and stormwater pollution prevention plans) used during construction and operation of the casino and resort project would also be used during the installation and operation of the solar PV carport system and flywheel and VRFB ESS. Therefore, no adverse effects to off-site water or air quality would occur as a result of the proposed project. The nearest off-reservation residences are located 1.2 miles to the north of the project site and 1.5 miles to the west of the site. Views from these vantage points are minimal due to the hilly topography and vegetation. Valley Center Road runs north-south along the western boundary of the project and is designated as a third priority County Scenic Highway in the County of San Diego General Plan. The speed limit along this road is 55 miles per hour. Motorists traveling along Center Valley Road do not have long-distance views from the south because a curve in the roadway results in the site being shielded by steep hills. There is limited long distance views from the north, which are obstructed in places by land form and vegetation barriers. Due to the high travel speeds of motorists, views of the solar PV carport system and VRFB ESS from passing cars traveling north or south along Center Valley Road will be brief. The installation of the solar PV carport system, flywheel ESS, and VRFB ESS will not significantly change off-reservation visual resources as these systems are not visually obtrusive and are similar to those currently onsite. Installation of the three systems is expected to reduce the Rincon community's GHG emissions by 1,004,898 kilograms of carbon dioxide during its first year of operation. Additionally, the project will reduce the Rincon community's electricity costs by \$625,366 during the first year of operation and \$26 million dollars over the project's expected 25-year lifetime. The Rincon Band of Luiseño Indians applied for a grant from the California Energy Commission to build the project, which is consistent with the California Energy Commission's mission of leading the state to a 100 percent clean energy future.

**Name of Public Agency Approving Project:** California Energy Commission

**Name of Person or Agency Carrying Out Project:** Rincon Band of Luiseño Indians

**Exempt Status:** *(check one)*

- Ministerial Exemption (Pub. Resources Code § 21080(b)(1); Cal. Code Regs., tit 14, § 15268);
- Declared Emergency (Pub. Resources Code § 21080(b)(3); Cal. Code Regs., tit 14, § 15269(a));
- Emergency Project (Pub. Resources Code § 21080(b)(4); Cal. Code Regs., tit 14, § 15269(b)(c));
- Categorical Exemption. State type and section number  
Cal. Code Regs., tit 14, § 15301
- Statutory Exemptions. State code number. PRC § 21080.35
- Common Sense Exemption. (Cal. Code Regs., tit 14, §15061(b)(3))

**Reasons why project is exempt:**

This project will involve the installation of a solar PV carport system, within an existing parking lot. The system will enable the generation of energy for onsite use. The PV system installation includes steel carport structures on new concrete pilings and electrical conduit to connect the system to a microgrid controller. Equipment associated with the PV carport system will not occupy more than 500 square feet of ground surface and will be located on the same parcel as the solar panels (APN 133-180-1500). The project does not involve a federal Clean Water Act permit; waste discharge requirements pursuant to the Porter-Cologne Water Quality Control Act; an individual take permit for species protected under the federal Endangered Species Act or the California Endangered Species Act; streambed alteration permit pursuant to the California Fish and Game Code; or removal of protected or

Authority cited: Sections 21083 and 21110, Public Resources Code. Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

native plants and trees. For these reasons, the PV portion of the project is statutorily exempt from CEQA under Public Resources Code, section 21080.35, provided for installation of a solar energy system on the roof of an existing building or at an existing parking lot.

This project will involve the installation of a ground mounted VRFB ESS and flywheel ESS within a fully developed property. The flywheel ESS and VRFB ESS installations will be minor alterations to two existing ground mounted solar fields within the interior of the Rincon Reservation with no expansion beyond the existing casino and reservation operation. The project will not have a significant adverse effect on the environment due to unusual circumstances, result in a significant cumulative impact, damage resources within a designated state scenic highway, cause substantial adverse change to the significance of a historical resource, or be located on a listed hazardous waste site. For these reasons, the VRFB and flywheel ESS portion of the project is categorically exempt from CEQA under California Code of Regulations, title 14, section 15301, as a minor alteration of existing facility.

The project consists of the installation of electrical components and infrastructure to accommodate a solar energy system and energy storage systems at the Harrah's Casino and Resort, within the Rincon Reservation. The new systems will reduce the Rincon Community's GHG emissions. The installation of these technologies will not result in the expansion of the existing use. The reservation is approximately 4,275 acres in size. The Harrah's Casino and Resort is located within the center of the Rincon Reservation. Vehicle trips associated with the construction of the project will be temporary and the operation of the energy systems will result in a negligible number of regular operational trips for maintenance of the systems. Motorists using Center Valley Road will view the new AC solar PV carport system briefly when passing by the Harrah's Casino and Resort; however, the new system is consistent with the existing development on site (e.g. existing solar fields). No adverse effects to off-site water or air quality would occur as a result of the proposed project. Therefore, for offsite impacts the project falls under the common sense exemption listed in California Code of Regulations, title 14, section 15061(b)(3). There is no possibility the installation of the energy systems will have a significant effect on the offsite environment.

The section 15301 and 15061(b)(3) exemptions each serve as an independent basis for finding the project exempt.

**Lead Agency**

**Contact Person:** Hatice Gecol **Area code/Telephone/Ext:** 916-327-2222

**If filed by applicant:**

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project?  Yes  No

**Signature:** *Hatice Gecol* **Date:** 7/9/2020 **Title:** Commission Agreement Manager

**Signed by Responsible Agency**

**Signed by Lead Agency**

**Signed by Applicant**

**Date received for filing at OPR:** \_\_\_\_\_