



# RIVERSIDE COUNTY PLANNING DEPARTMENT

*John Hildebrand*  
*Planning Director*

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

**DATE:** November 14, 2022

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

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

<b>LEAD AGENCY:</b>	County of Riverside TLMA Planning Department 4080 Lemon Street, 12th Floor Riverside, California 92501	Contact Person: Tim Wheeler Phone Number: (951) 955-6060 Email: TWheeler@rivco.org Website: <a href="http://planning.rctlma.org">http://planning.rctlma.org</a>
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<b>APPLICANT:</b>	IP Easley, LLC c/o Intersect Power, LLC 9450 SW Gemini Drive PMB#68743 Beaverton, OR 97008-7105	Contact Person: Camille Wasinger Phone Number: (303) 909-6396 Email: <a href="mailto:camille@intersectpower.com">camille@intersectpower.com</a>
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**PROJECT LOCATION:** The Easley Renewable Energy Project (Easley or Project) is located in Riverside County, north of Interstate 10 (I-10) and approximately 2 miles north of the town of Desert Center, CA. The Project consists of 24 parcels on private land (~990 acres), and 13 parcels on BLM-administered lands (~2,745 acres). The APNs of which are listed on the attached sheet titled "Assessor's Parcels for Project Site CUP 220021 Easley Renewable Energy Project." The 500 kilovolt (kV) generation tie (gen-tie) transmission line would transmit the solar power generated from an onsite substation, on the southern edge of the Easley Project just west of Rice Road/State Route (SR) 177, to interconnect into the regional transmission grid approximately 6.7 miles to the east-southeast.

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

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

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

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

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

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

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

### **Easley Renewable Energy Project Scoping Meeting**

Date: Monday December 5, 2022  
Time: 1:30pm or as soon as possible thereafter  
Location: Riverside County Planning Department  
4080 Lemon Street, 12th Floor  
Riverside, California 92501

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

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

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

Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT  
Attn: Tim Wheeler, Project Planner  
PO Box 1409; Riverside, CA 92502-1409  
[TWheeler@rivco.org](mailto:TWheeler@rivco.org)

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

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT

*Timothy Wheeler*

Tim Wheeler  
Project Planner for Easley Renewable Energy Project

# Easley Renewable Energy Project

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

**NOTICE OF PREPARATION**  
**ATTACHMENT A**  
**EASLEY RENEWABLE ENERGY PROJECT**

**A. Description of the Proposed Project**

**Project Location**

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

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

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

**Project Description**

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

The proposed Project would consist of the following major components:

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

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

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

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

## **Applicant's Project Objectives**

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

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

## **Land Use Considerations**

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

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

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

## **Project Components**

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

### **Solar Arrays**

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

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

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

### **Inverters, Transformers, and Electrical Collection System**

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



## **Project Substations and Switchyards**

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

## **500 kV Gen-tie Transmission Line**

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

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

## **Operation and Maintenance Building**

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

## **SCADA and Telecommunications Facilities**

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

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

### **Battery Energy Storage System**

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

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

### **Meteorological Data Collection System**

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

### **Access Roads**

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

### **Fencing**

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

## **Water Requirements**

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

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

## **General Construction Process**

### **Site Preparation**

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

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

### **Construction Activities**

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

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

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

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

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

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

## **Operation and Maintenance Activities**

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

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

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

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

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

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

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

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

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

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

## **Decommissioning**

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

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

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

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

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

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

## **B. Environmental Topics to be Addressed**

### **Introduction**

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

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

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

### **Aesthetics/Visual Resources/Reflection**

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

## **Agricultural and Forestry Resources**

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

## **Air Quality**

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

## **Biological Resources**

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

## **Cultural Resources and Tribal Cultural Resources**

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

## **Energy**

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

## **Geology and Soils**

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

## **Greenhouse Gas Emissions**

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

## **Hazards and Hazardous Materials**

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

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

## **Hydrology and Water Quality**

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

## **Land Use and Planning**

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

## **Mineral Resources**

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

## **Noise**

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

## **Paleontological Resources**

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

## **Population and Housing and Socioeconomics**

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

## **Public Services and Utilities/Service Systems**

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

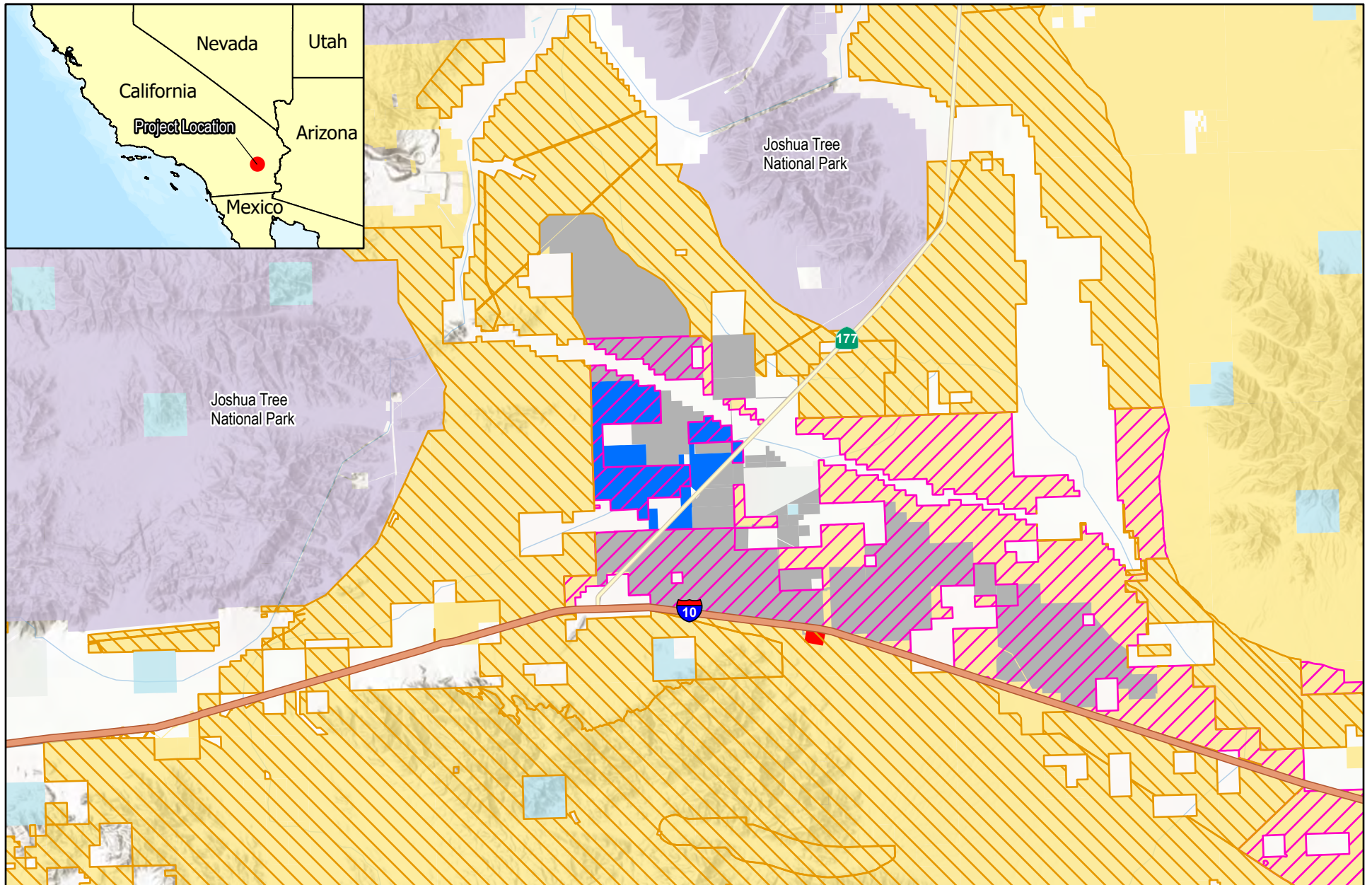
## **Traffic and Circulation**

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

## **Wildfire**

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





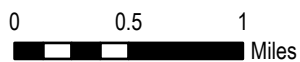
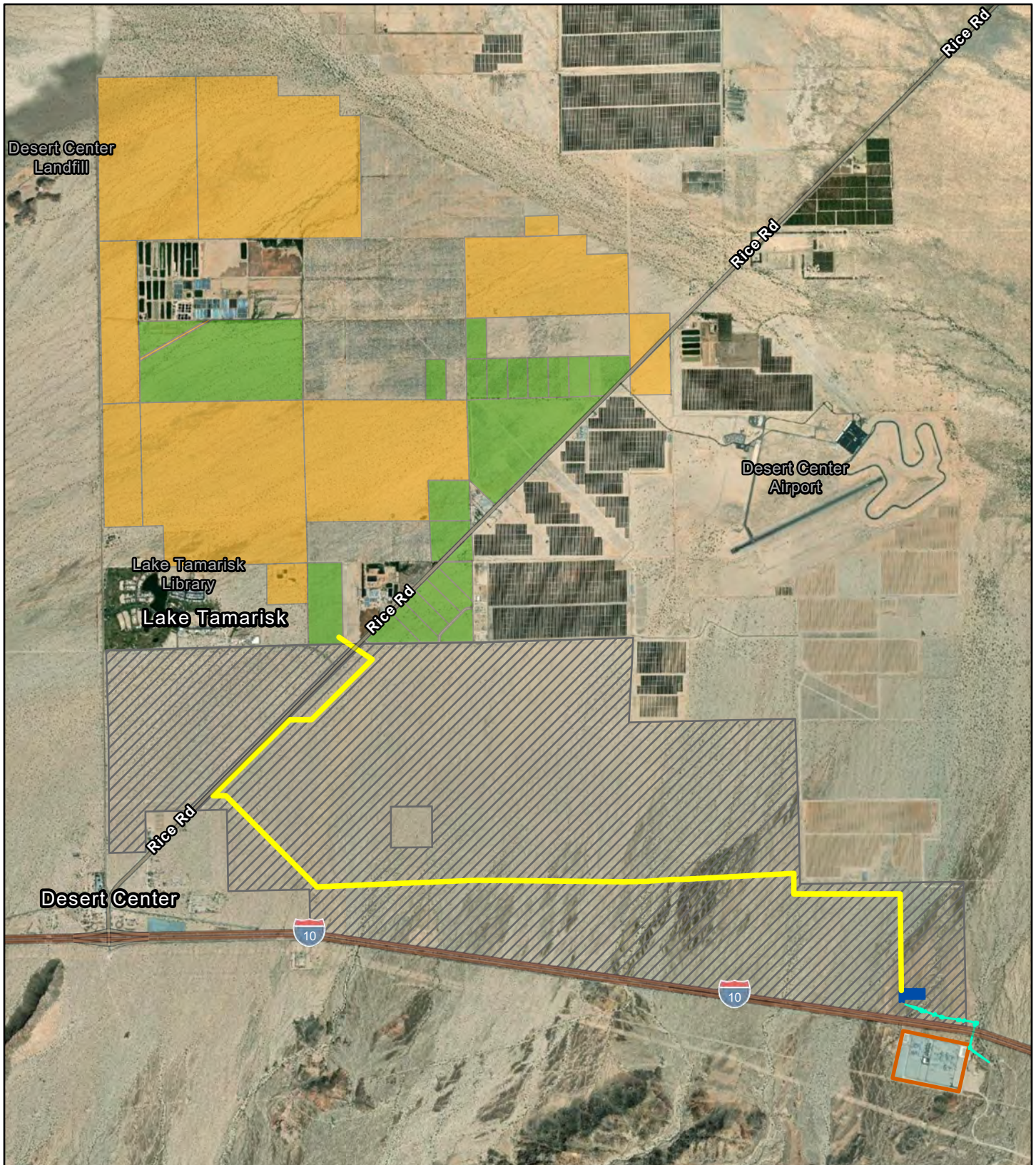
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|---|---|---|
|  Easley Renewable Energy Project       |  ACEC                                      |  National Park Service |
|  Surrounding Renewable Energy Projects |  Development Focus Area (All Technologies) |  State                 |
|  Red Bluff Substation                  |  Bureau of Land Management                 |   |

**Figure 1**

**Project Vicinity**

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



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

**Figure 2**

**Project Area**

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