

Riverside County
Facilities Management
 3450 14th Street, Riverside, CA 92501

NOTICE OF EXEMPTION

May 1, 2024

Project Name: Approval the 5-Year Operation & Maintenance (O&M) Agreement Engie Services U.S. Inc. to Provide Services for Solar Generating Facilities

Project Number: FM061030

Project Locations: 15 Solar-Generating Sites Countywide (See attached table)

Location	Address
Ben Clark Training Center (BCTC)	16763 Davis Ave, Riverside, CA 92518
Ben Clark NEM-A	16791 Davis Ave, Riverside, CA 92518
Cabazon Sheriff	50290 Main St, Cabazon, CA 92230
Crestmore Heights	1500 Castellano Rd, Riverside, CA 92240
Desert Hot Springs Mental Health	14320 Palm Dr, Desert Hot Springs, CA 92240
Hemet Sheriff Station	43950 Acacia Ave, Hemet, CA 92544
Palm Desert Sheriff	73700 Gerald Ford Dr, Palm Desert, CA 92211
Palm Springs CAC	3255 E Tahquitz Canyon Way, Palm Springs, CA 92262
Perris County Coroner	800 S Redlands Ave, Perris, CA 92570
Perris Sheriff	308 E San Jacinto Ave, Perris, CA 92570
Riverside Animal Shelter	6851 Van Buren Blvd, Jurupa Valley, CA 92509
Rubidoux Health Clinic	5256 Mission Blvd, Riverside, CA 92509
San Jacinto Animal Shelter-CP	581 S Grand Ave, San Jacinto, CA 92582
San Jacinto Animal Shelter-GM	581 S Grand Ave, San Jacinto, CA 92582
Temecula CAC	41002 County Center Dr, Temecula, CA 92591

Description of Project: On May 20, 2014 the county entered into a Program Development Agreement with Chevron Energy Solutions, which is now Engie Services U.S. Inc. (Engie) to provide and construct Energy Conservation Measures (ECMs) at various county facilities. The ECM opportunities focused on solar photovoltaic systems (PV generating facilities) and the enrollment of Riverside County in a special local-government program called the Renewable Energy Self-Generation Bill Credit Transfer (RES-BCT) program and tariff. allowed the County to generate solar electricity at one account and transfer any available excess bill credits (in dollars) to another county account-called a "benefitting" account. Engie provided two types of installations--Generating Sites RES-BCT tariff and Net Metering Sites (traditional sites providing a solar power offset for facility) at 15 County locations.

The implementation of the O&M Agreement would result in the provision of the following services to keep the facilities operating efficiently to maximize savings generated by the County.

- **Inspection:** Inspect PV modules, combiner boxes, inverters, isolation transformers, and PV service roof penetrations and support structure on an annual basis and semi-annual where central inverters exist at Ben Clark, Crestmore Heights, Palm Desert, Perris County Coroner, Perris Sheriff, and San Jacinto Animal Shelter.
- **Testing:** Perform voltage testing, amperage testing, and infrared scans of inverters, combiner boxes, disconnects and switchgear on an annual basis, and semi-annual where central inverters exist at Ben Clark, Crestmore Heights, Palm Desert, Perris County Coroner
- **Monitoring:** System performance will be monitored on a daily basis and evaluated monthly by comparing actual production data and actual local weather data to the production values predicted by PVsyst modeling software. Monthly email reports showing production for the month, production year to date, and monthly percent of expected production shall be generated.
- **Cleaning:** Dust, dirt, and debris shall be removed from outside cabinets of combiner boxes, inverters, transformers, and disconnect switches and PV modules will be washed and accumulated dust and debris will be removed annually.
- **Weed Abatement at Crestmore Heights and San Jacinto Animal Shelter Sites:** Use of mechanical equipment will be used to mow or whack the vegetation to a height of 12 inches or less from the ground within the fenced in area enclosing the PV system.

To date, the County has generated 6,232 megawatt hours of energy from its 15 PV generating sites.

Government Code Section 41217 authorizes local governments to enter into energy contracts on terms that are found to be in the best interests of the agency, which allows for the single source as long as the energy cost savings for the services are less than without those services. As Engie has designed, constructed, and operated the County facilities since their inception, they are best suited in experience to provide maintenance and report services that maximize energy savings to the County. In addition, Engie has a performance contract with the County that has identified Guaranteed savings to be met through the production of solar energy, which further demonstrates a commitment to maximize the value of services to the County by maintaining the most efficient equipment feasible. Therefore, the County is entering into a sole source Agreement for the continued maintenance and reporting of the 15 County sites for an additional five-year term. The O&M Agreement is identified as the proposed project under the California Environmental Quality Act (CEQA). The operation of the 15 County solar-generating sites will continue to provide public services and will not result in an expansion of existing use. No additional direct or indirect physical environmental impacts are anticipated.

Name of Public Agency Approving Project: Riverside County

Name of Person or Agency Carrying Out Project: Riverside County Facilities Management

Exempt Status: State California Environmental Quality Act (CEQA) Guidelines, Section 15301 Existing Facilities Exemption; and 15061(b) (3), General Rule or “Common Sense” Exemption, Codified under Title 14, Articles 5 and 19, Sections 15061, and 15301.

Reasons Why Project is Exempt: The proposed project is categorically exempt from the provisions of CEQA specifically by the State CEQA Guidelines as identified below. The project will not result in any specific or general exceptions to the use of the categorical exemption as detailed under State CEQA Guidelines Section 15300.2. The project will not cause an impact to an environmental resource of hazardous or critical concern nor would the project include unusual circumstances which could have the possibility of having a significant effect on the environment. The project would not result in impacts to scenic highways, hazardous waste sites, historic resources, or other sensitive natural environments, or have a cumulative effect to the environment. No significant environmental impacts are anticipated to occur with the operation and maintenance of the 15 County solar-generating sites.

- **Section 15301 –Existing Facilities:** This Class 1 categorical exemption includes the operation, repair, maintenance, leasing, or minor alteration of existing public or private structures or facilities, provided the exemption only involves negligible or no expansion of the previous site’s use. The project, as proposed, is limited to the operation and maintenance to the existing 15 solar-generating sites within Riverside County. The use of the facilities would continue to provide public services and would not result in a significant increase in capacity or intensity of use. Therefore, the project is exempt as it meets the scope and intent of the Categorical Exemption identified in Section 15301, Article 19, Categorical Exemptions of the CEQA Guidelines.
- **Section 15061 (b) (3) – “Common Sense” Exemption:** In accordance with CEQA, the use of the Common Sense Exemption is based on the “general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment.” State CEQA Guidelines, Section 15061(b) (3). The use of this exemption is appropriate if “it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.” *Ibid*. This determination is an issue of fact and if sufficient evidence exists in the record that the activity cannot have a significant effect on the environment, then the exemption applies and no further evaluation under CEQA is required. See *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal. 3d 68. The ruling in this case stated that if a project falls within a category exempt by administrative regulation or 'it can be seen with certainty that the activity in question will not have a significant effect on the environment', no further agency evaluation is required. With certainty, there is no possibility that the project may have a significant effect on the environment. The operation and maintenance to the 15 solar-generating sites that would occur as a result of the O&M Agreement will not result in any direct or indirect physical environmental impacts. The use of the facilities would remain unchanged, continuing to provide public services. Therefore, in no way, would the project as proposed have the potential to cause a significant environmental impact and the project is exempt from further CEQA analysis.

Based upon the identified exemptions above, the County of Riverside, Facilities Management hereby concludes that no physical environmental impacts are anticipated to occur and the project as proposed is exempt under CEQA. No further environmental analysis is warranted.

Signed:  _____ Date: 5-1-2024

Mike Sullivan,
County of Riverside, Facilities Management