Appendix H: WQMP Exemption Memo Prepared by WEBB Associates **CEQ 220011** Salvador Solar Uniun Energy Management Services



Technical Memorandum

To: Cassandra Simas, Assistant Engineer, Riverside County Transportation Dept.

From: Scott R. Hildebrandt, P.E., Chief Strategy Officer

Date: May 16, 2022

Re: Project Salvador Solar Facility: CZ2200004/CUP220003/DA2200003 – WQMP Exemption

Introduction

This Water Quality Exemption technical memorandum is prepared for the Project Salvador Solar Facility: CZ2200004/CUP220003/DA2200003. The Project Salvador is a proposed solar and battery project. The Conditional Use Permit and Development Agreement proposes the development of a 400-megawatt (MW) battery and 60-150 MW unmanned solar facility and associated improvements on a 147.1 net acre site, located south of Ramon Road and east of Interstate 10 in Thousand Palms in the unincorporated County of Riverside. The solar and battery facility would consist of 400 self-contained one MW storage batteries to be installed on elevated metal platforms. Grading would be minimal to match the natural contours and impervious areas would not be created as all facilities would be elevated to allow natural flooding patterns to be preserved so no concrete slabs would be constructed. Additionally, no asphalt paving would be constructed due to using road base gravel for road. The intent is that the rain will drain through the platforms or the road base into the native soils within the site and not create a water quality concern as water quality level storm events will infiltrate into the site soils. This is typical for projects in the surrounding area. Photovoltaic (PV) rows would consist of 96 modules each, 2 x 48 single axis trackers, bifacial passivated emitter rear cell (PERC) technology.

The project area is located downstream of the toe of the Thousand Palms Wash alluvial fan. Several other smaller alluvial fans exist upstream of the project site. Sediment sources in the project vicinity are the alluvial fan runoff from these fans as well as wind blown sands. Several small unnamed ephemeral streams cross the project limits draining primarily south to southeasterly. The ephemeral streams are generally not well defined and may experience some lateral movement during runoff events. As a result of the alluvial fan runoff the project site is subject to occasional shallow flooding. It is because of this condition, and the requirement to perpetuate historical runoff patterns, that the solar panels and the battery containers are elevated three to four feet above the natural terrain. By doing this, along with using road base instead of asphalt, no impervious areas are created. Because there is no proposed impervious area within the project site, there is no increased runoff and any direct rainfall will drain onto the existing terrain within the project area as it historically done in the past where it infiltrates into the soils within the project area.

As the project only consists of minor grading that replicates the existing landform and uses pervious road base materials instead of asphalt concrete, general pollutants are not created.

According to the Whitewater River Water Quality Guidance Document, a project requires a WQMP when it meets the thresholds for a Priority Development Project. The proposed project does not fall into the categories for a Priority Development Project based on the criteria shown in the tables in Appendix A.

The project does not propose any new development that would be used by people, such as industrial or commercial centers, housing or subdivisions that create impervious area. The project also does not propose any automotive repair shops, restaurants, parking lots, or retail gasoline outlets. The project is not located on a hillside and will not construct impervious areas that would generate pollutants. Since the solar and battery project does not fall into any of these categories, no Potential Pollutants of Concern are expected to be generated from the project.

Since the solar and battery project does not fall into the category of a Priority Development Project under the Guidance Document, does not generate pollutants of concern, does not create an impervious footprint or connected impervious areas, and preserves the natural terrain to allow rainfall infiltration, the project is exempt from the requirements of a WQMP.

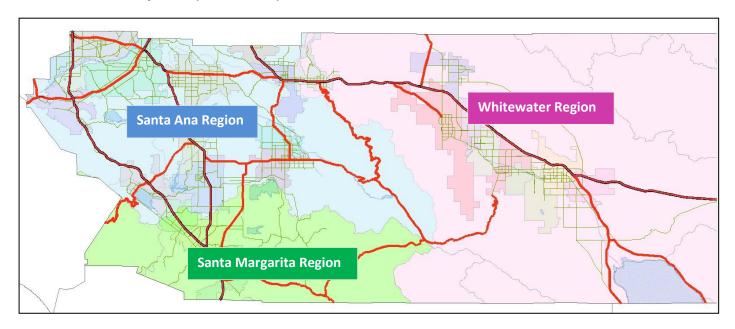
Appendix A: Priority Development Project Categories

Appendix B: Project Salvador CUP 220003

APPENDIX A

Water Quality Management Plan Applicability Checklists and Other Development Project Checklists for all watersheds/areas in unincorporated Riverside County.

All projects in unincorporated Riverside County shall complete the appropriate *Water Quality Management Plan (WQMP) Applicability Checklist* to confirm if WQMP requirements apply, and be submitted with your project's application. In addition, if the project is exempt from WQMP requirements and is in the **Santa Margarita Region**, the project shall complete the "*Other Development Project Checklist*" and submit to the Riverside County Transportation Department.



If WQMP requirements apply, a Preliminary WQMP shall be submitted and approved by the Transportation Department prior to entitlements, and a Final WQMP shall be submitted and approved by the Transportation Department prior to any building or grading permit.

Permanent Water Quality facilities (known as Post-Construction Best Management Practices (BMPs)) are required to address expected pollutant loads and higher runoff characteristics from most private development projects and public capital projects. These Post-Construction BMPs are designed with a Project-Specific WQMP. WQMP requirements are separate from the requirements for temporary impacts during the construction phase (i.e. Stormwater Pollution Prevention Plan (SWPPP), and construction BMPs).

Three State Regional Water Quality Control Boards regulate water quality requirements in Riverside County. Each State Regional Board has different WQMP requirements for their jurisdiction. Templates and guidance documents for each region are available through the compliance document links below. Applicability Checklists are included to verify if WQMP requirements apply for a given project or if no WQMP is required.

Santa Ana Region: http://rcflood.org/NPDES/SantaAnaWS.aspx

Santa Margarita Region: http://rcflood.org/NPDES/SMRWMA.aspx

Whitewater Region: http://rcflood.org/NPDES/WhitewaterWS.aspx

As of November 1, 2018, all WQMPs for development projects will be reviewed by the Riverside County Transportation Department, for the unincorporated portions of Riverside County. For Riverside County Flood Control facilities, typically storm drains larger than 36-inch diameter, the Riverside County Flood Control District will continue to review the Hydrology studies and their associated improvement plans, but Transportation will review the WQMP on behalf of Flood Control.

Checklist for Identifying Projects Requiring a Project-Specific Water Quality Management Plan (WQMP) within the Whitewater River Region		
Project File No.		
Project Name:		
Project Location:		
Project Description:		

All applications for discretionary New Development and Redevelopment projects that fall into one of the Priority Development Project categories submitted to the local permitting authority on or after December 31, 2014 require preparation, approval, and implementation of a project-specific WQMP that complies with the WQMP Guidance document.

The eight Priority Development Project Categories are:		
Single-family hillside residences that create 10,000 square feet or more of impervious area where the natural slope is 25% or greater;		
Single-family hillside residences that create 10,000 square feet of impervious area where the natural slope is 10% or greater where erosive soil conditions are known;		
Commercial and Industrial developments of 100,000 square feet or more;		
Automotive repair shops (Standard Industrial Classification (SIC) codes ¹ 5013, 7532, 7533, 7534, 7537, 7538, and 7539)		
Retail gasoline outlets disturbing greater than 5,000 square feet;		
Restaurants disturbing greater than 5,000 square feet;		
Home subdivisions with 10 or more housing units; and,		
Parking lots of 5,000 square feet or more or with 25 or more parking spaces, and potentially exposed to Urban Runoff.		

¹ Descriptions of SIC codes can be found at http://www.osha.gov/pls/imis/sicsearch.html.

DETERMINATION: Check the box for applicable determination.

<u>Any</u> questions answered "YES" Project requires a project-specific WQMP. Electronic submittals are

encouraged on CD and required for the approved documents.

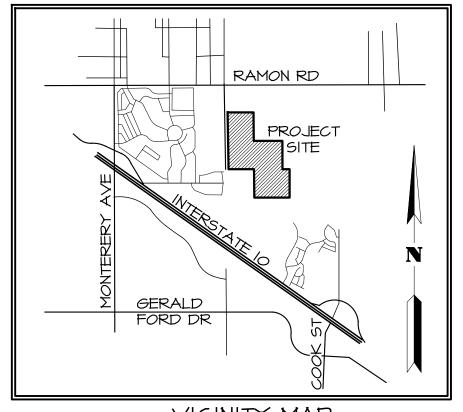
<u>All</u> questions are answered "NO" Project requires incorporation of Site Design Best Management Practices

(BMPs) and Source Control BMPs imposed through Conditions of Approval

or permit conditions.

Y:\Planning Master Forms\Application Forms\Project_Specific_WQMP_Checklist_Whitewater_River_updated_April_2019.docx Revised: 04/10/2019

APPENDIX B



<u>VICINITY MAP</u>

EXISTING/PROPOSED GENERAL PLAN LAND USE:

MEDIUM DENSITY RESIDENTIAL (MDR) AND RURA

EXISTING ZONING: R-I RESIDENTIAL (ALL APNS)

PROPOSED ZONING: R-D REGULATED

APPLICANT

THOUSAND PALMS 278, LLC UNIUN ENERGY MANAGEMENT SERVICES, LLC P.O. BOX 12950 2045 E. TAHQUITZ CANYON WAY PALM DESERT, CA 92255 PALM DESERT, CA 92262 CONTACT: FRED NOBLE CONTACT: FRED NOBLE

SOILS ENGINEER ENGINEER / REPRESENTATIVE

PHONE: (760) 323-9490

FAX: (760) 537-7284

ALBERT A. WEBB ASSOCIATES 3788 MCCRAY STREET 42-240 GREEN WAY, SUITE E RIVERSIDE, CA 92506 CONTACT: ALAN PACE, CEG CONTACT: OSCAR VALADEZ PHONE: (951) 686-1070 FAX: (951) 788-1256

LAND USE AND ZONING

RESIDENTIAL (RR)

DEVELOPMENT (ALL APNS)

651-130-062 THRU -065 EXISTING LAND USE: YACANT LOT 651-140-017 THRU -025

651-140-039 THRU -042 <u>ACREAGE</u>

PHONE: (760) 323-9490

PETRA GEOSCIENCES, INC.

PALM DESERT, CA 92211

PHONE: (760) 340-5303

FAX: (760) 340-5096

<u>A.P.N.</u>

FAX: (760) 537-7284

OWNER

165.2 GROSS ACRES NET ACRES 151.2

SCHOOL DISTRICT

PALM SPRINGS UNIFIED SCHOOL

DISTRICT

UTILITY PROVIDERS

WATER	COACHELLA VALLEY WATER DISTRIC
SEWER	N/A
ELECTRICAL	IMPERIAL IRRIGATION DISTRICT
GAS	SOUTHERN CALIFORNIA GAS COMPAN
TELEPHONE	FRONTIER
CABLE T.V.	CHARTER COMMUNICATIONS

LEGAL DESCRIPTION

PARCEL I:

PARCELS 21, 22, 23, 24, 25, 26, 27 AND 28, IN THE COUNTY OF RIVERSIDE STATE OF CALIFORNIA, AS SHOWN ON THE RECORDS OF SURVEY, FILED IN BOOK 22, PAGE 3 OF RECORDS OF SURVEY, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXCEPT THEREFROM THE WESTERLY 140.00 FEET OF SAID PARCELS 24 AND 25 AS CONVEYED TO SOUTHERN CALIFORNIA EDISON COMPANY BY THE DEED RECORDED AUGUST 7, 1984 AS INSTRUMENT NO. 172083, OFFICIAL RECORDS.

PARCEL IA:

AN EASEMENT FOR ROADWAY AND PUBLIC UTILITY PURPOSES TO BE USE IN COMMON WITH OTHER OVER VARIOUS STRIPS OF LAND DESIGNATED OF LAND DESIGNATED AS "ROAD EASEMENTS" AS SHOWN ON THE RECORD OF SURVEY FILED IN BOOK 22, PAGE 3 OF RECORDS OF SURVEY, RIVERSIDE COUNTY RECORDS.

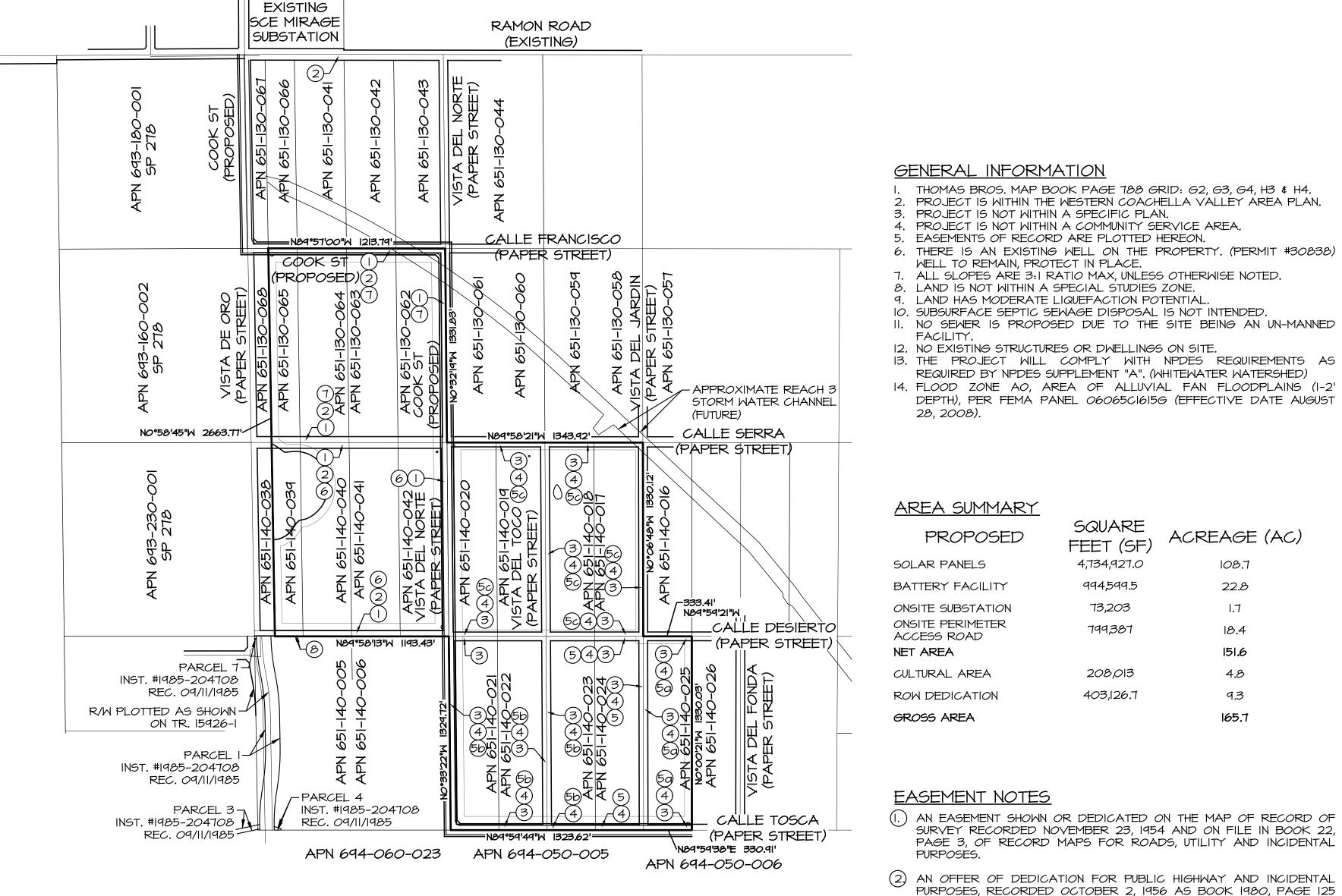
PARCEL 2:

PARCELS 41, 42, 43, 44, 45, 46, 47, 48, AND 49, IN THE COUNTY OF RIVERSIDE STATE OF CALIFORNIA, AS SHOWN ON THE RECORD OF SURVEY FILED IN BOOK 25, PAGE 44 OF RECORDS OF SURVEY, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 2A:

AN EASEMENT FOR ROADWAY AND PUBLIC UTILITY PURPOSES TO BE USED IN COMMON WITH OTHERS OVER VARIOUS STRIPS OF LAND DESIGNATED AS "ROAD EASEMENTS" AS SHOWN ON THE RECORD OF SURVEY FILED IN BOOK 25, PAGE 44 OF RECORDS OF SURVEY, RIVERSIDE COUNTY RECORDS.

(7.) AN EASEMENT FOR ROADWAY, PUBLIC UTILITIES TO BE USED IN DESCRIPTION COMMON WITH OTHERS AND INCIDENTAL PURPOSES, RECORDED INDEX MAP FEBRUARY 14, 1964 AS INSTRUMENT NO. 19009 IN BOOK 3611 PAGE 4 DETAILS OF OFFICIAL RECORDS, IN FAVOR OF TITLE INSURANCE AND TRUST CONCEPTUAL GRADING FENCE AND WALL



PROJECT DESCRIPTION

A CHANGE OF ZONE FOR THE PROJECT PROPOSES TO MODIFY THE ENTIRE PROJECT SITE FROM SINGLE-FAMILY RESIDENTIAL ZONE (R-I) TO REGULATED DEVELOPMENT AREA (R-D). A CONDITIONAL USE PERMIT (CUP) AND DEVELOPMENT AGREEMENT (DA) PROPOSES THE DEVELOPMENT OF A 400-MEGAWATT (MW) BATTERY AND 60-150 MW UNMANNED SOLAR FACILITY AND ASSOCIATED IMPROVEMENTS ON A 166± ACRE SITE, LOCATED SOUTH OF RAMON ROAD AND EAST OF INTERSTATE IO (I-IO) IN THOUSAND PALMS IN THE UNINCORPORATED COUNTY OF RIVERSIDE. THE BATTERY FACILITY WOULD CONSIST OF 400 SELF-CONTAINED ONE MW STORAGE BATTERIES TO BE INSTALLED ON ELEVATED METAL PLATFORMS. GRADING AND PAVING WOULD BE MINIMAL DUE TO USING ROAD BASE GRAVEL FOR ROAD. PHOTOVOLTAIC (PV) ROWS WOULD CONSIST OF 96 MODULES EACH, 2 X 48 SINGLE AXIS TRACKERS, BIFACIAL PASSIVATED EMITTER REAR CELL (PERC) TECHNOLOGY.

FIRE ACCESS WILL BE PROVIDED FROM RAMON ROAD TO THE PROJECT SITE. WATER SERVICES TO THE PROJECT SITE WOULD BE PROVIDED BY COACHELLA VALLEY WATER DISTRICT (CYMD) VIA AN EXISTING WATER LINE BENEATH RAMON ROAD TO ENSURE SOLAR PANEL MAINTENANCE AND POTENTIAL LANDSCAPING CARE ALONG THE PERIMETER OF THE SITE. NO SEWAGE OR STORM DRAIN FACILITIES WOULD BE NEEDED FOR THE PROPOSED PROJECT. ALL PROJECT RUNOFF WOULD BE DRAINED VIA CONTOUR GRADING, WHICH WOULD MATCH THE HISTORICAL DRAINAGE PLAN OF THE SITE. A PUBLIC USE PERMIT (PUP) WOULD BE REQUIRED TO ALLOW FOR AN APPROXIMATELY 1,400 FOOT POWER LINE EXTENSION FROM THE PROJECT SITE TO NORTH OF RAMON ROAD TO CONNECT TO THE SOUTHERN CALIFORNIA EDISON (SCE) MIRAGE SUBSTATION NORTH OF RAMON ROAD.

APPROXIMATE EARTHWORK QUANTITY ESTIMATE

CUT- 174,200 CU. YDS. FILL- 138,030 CU. YDS. SHRINKAGE- 26,130 CU. YDS. SUBSIDENCE- 10,040 CU. YDS. NET- O CU. YDS. (BALANCED)

500 1000

INCIDENTAL PURPOSES, RECORDED NOVEMBER 20, 1968 AS INSTRUMENT NO. 111526 OF OFFICIAL RECORDS. ADDRESED PLANNING PCI COMMENTS. REMOVED SOUTHERN 4/25/22 RSB PARKING, REPLACED W/ SOLAR. ADDED LIGHTING TO PLAN.

ALBERT A. SCALE: 1" = 50 DATE: 4/27/2 ASSOCIATES PLN CK REF: PLOT DATE: 27-Apr-22

THOMAS BROS. MAP BOOK PAGE 788 GRID: G2, G3, G4, H3 \$ H4.

REQUIRED BY NPDES SUPPLEMENT "A". (WHITEWATER WATERSHED)

SQUARE

4,734,927.0

994,599.5

73,203

208,013

403,126.7

SURVEY RECORDED NOVEMBER 23, 1954 AND ON FILE IN BOOK 22,

PAGE 3, OF RECORD MAPS FOR ROADS, UTILITY AND INCIDENTAL

PURPOSES, RECORDED OCTOBER 2, 1956 AS BOOK 1980, PAGE 125

SURVEY RECORDED OCTOBER 16, 1956 AND ON FILE IN BOOK 25,

PAGE 44, OF RECORD MAPS FOR ROADS, UTILITY AND INCIDENTAL

PURPOSES, RECORDED OCTOBER 18, 1956 AS BOOK 1987, PAGE 431

COMMON WITH OTHERS AND INCIDENTAL PURPOSES, RECORDED

MARCH II, 1958 IN BOOK 2236 PAGE 248 [5]; APRIL 18, 1958 AS

INSTRUMENT NO. 28370 IN BOOK 2257, PAGE 460 [5A]; SEPTEMBER

24, 1959 AS INSTRUMENT NO. 82091 [5B]; AND MARCH 28, 1960 AS

INSTRUMENT NO. 27115 IN BOOK 2663 PAGE 345 [5C], ALL OF

OFFICIAL RECORDS, IN FAVOR OF TITLE INSURANCE AND TRUST

COMMON WITH OTHERS AND INCIDENTAL PURPOSES, RECORDED

MARCH 28, 1960 AS INSTRUMENT NO. 27114 IN BOOK 2663 PAGE 344

OF OFFICIAL RECORDS, IN FAVOR OF TITLE INSURANCE AND TRUST

(6) AN EASEMENT FOR ROADWAY, PUBLIC UTILITIES TO BE USED IN

(8) A 4.00' WIDE EASEMENT FOR SEWER, WATER, TELEPHONE AND POWER LINES AND FOR OTHER UTILITY AND FOR ROADWAY AND RIGHT-OF-WAY PURPOSES AND FOR INGRESS AND EGRESS AND

(3) AN EASEMENT SHOWN OR DEDICATED ON THE MAP OF RECORD OF

(4) AN OFFER OF DEDICATION FOR PUBLIC HIGHWAY AND INCIDENTAL

(5) AN EASEMENT FOR ROADWAY AND PUBLIC PURPOSES TO BE USED IN

OF OFFICIAL RECORDS, TO COUNTY OF RIVERSIDE.

OF OFFICIAL RECORDS, TO COUNTY OF RIVERSIDE.

ACREAGE (AC)

108.7

22.8

1.7

9.3

DEPTH), PER FEMA PANEL 06065CI6I5G (EFFECTIVE DATE AUGUST

PROJECT IS NOT WITHIN A SPECIFIC PLAN.

WELL TO REMAIN, PROTECT IN PLACE.

28, 2008).

PURPOSES.

COMPANY.

COMPANY.

COMPANY.

DESIGNED:

CHECKED:

PROPOSED

PROJECT IS NOT WITHIN A COMMUNITY SERVICE AREA

LAND HAS MODERATE LIQUEFACTION POTENTIAL

PROJECT IS WITHIN THE WESTERN COACHELLA VALLEY AREA PLAN.

THERE IS AN EXISTING WELL ON THE PROPERTY. (PERMIT #30838)

ENGINEERING CONSULTANTS 3788 McCRAY STREET RIVERSIDE CA. 92506 PH. (951) 686-1070 FAX (951) 788-1256

CONDITIONAL USE PERMIT NO. 220003 SALVADOR SOLAR

INDEX MAP

LANDSCAPE

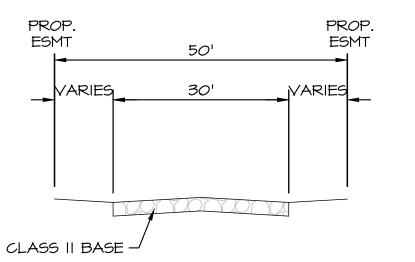
W.O. 2021-0186 SHEET OF 6 SHEET: DWG. NO.

C/L 44' 44' 29'

CLASS II BASE COOK STREET (INTERIM) MODIFIED SECONDARY HIGHWAY (88' R/W) N.T.S.

R/W 44' 32' FUT. C&G-FUT. BASE COURSE -

> COOK STREET (FUTURE) MODIFIED SECONDARY HIGHWAY MODIFIED STD. NO. 94 (88' R/W) N.T.S.



PERIMETER ACCESS ROAD (ONSITE) EMERGENCY ACCESS EASMENT OVER PERIMETER ACCESS ROAD N.T.S.

