

Appendix A

Scoping Summary Memo

CEQA Scoping Report

IP Athos, LLC

Athos Renewable Energy Project

Conditional Use Permit No. 180001

Public Use Permit No. 180001



RIVERSIDE COUNTY
PLANNING DEPARTMENT

CEQA Lead Agency:

Riverside County

Planning Department

4080 Lemon Street, 12th Floor

Riverside, CA 92502

Contact: Jason Killebrew

Phone: (951) 955-0314

June 2018

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Introduction

This scoping report documents the public scoping effort conducted by the Riverside County Planning Department (County) for the Athos Renewable Energy Project (Project). IP Athos, LLC, a subsidiary of Intersect Power, the Project Applicant, has filed an application with the County for a Conditional Use Permit (No. 180001) and a Public Use Permit (No. No. 180001). In compliance with California Environmental Quality Act (CEQA), the County held a 30-day public scoping period to allow the members of the public, regulatory agencies, and interested parties an opportunity to comment on the scope of the Environmental Impact Report (EIR) and to identify issues that should be addressed in the environmental document. This report documents the notification that occurred, the Scoping Meeting that was held, and the written comments received during the scoping period.

Project Scoping

This section describes the methods used to notify the public and agencies about the scoping process conducted for the Project. It outlines how information was made available for public and agency review and identifies the different avenues available for providing comments on the Project. The 30-day scoping period began on May 11, 2018 and continued through June 11, 2018.

Notice of Preparation

On May 11, 2018, the County issued a Notice of Preparation (NOP) consistent with CEQA Guidelines Section 15082, which summarized the proposed Project, stated its intention to prepare an EIR, and requested comments from interested parties (the NOP is provided in Appendix A). NOPs were mailed to responsible, trustee, and interested agencies, the State Clearinghouse, tribal governments, all residents within 2,400 feet of the project boundaries and individuals on the County's interested parties list. Fifteen copies were submitted to the State Clearinghouse. A copy of the NOP was also mailed to both the Desert Sun and Press-Enterprise newspapers, and the City of Riverside Public Library.

Scoping Meeting

On Monday June 4, 2018, the County held a Scoping Meeting at 1:30 p.m. at the County of Riverside, Desert Office in Palm Desert. At the Scoping Meeting, Kevin White, Planner, represented the County's Planning Department, and was assisted by Hedy Koczwara from Aspen Environmental Group. Kevin White and Hedy Koczwara presented the intent of the Scoping Meeting, the EIR timeline, the approval process, and a brief overview of the proposed Project. Attendees were then able to provide verbal comments.

The following information was part of the public scoping meeting:

- **Meeting Sign-in Sheet** to record contact names and addresses of all meeting attendees for use in future mailings.
- **Project Presentation Handout** including information on key components of the Project, the CEQA process, the purpose of scoping and how to provide comments.
- **Speaker Registration Card** to be filled out by anyone wishing to speak at the meeting.

Table 1, below, summarizes each of the verbal comments. Appendix B includes the sign-in sheet documenting the stakeholders who attended the meeting, and the speaker cards that were submitted during the meeting. As shown on the sign-in sheet, 18 people signed the sheet. Appendix C provides copies of the mailed and emailed comments.

Internet Website

The County has established a Project-specific website to provide ongoing information about the Project. The website includes an electronic version of the NOP, which provides a description of the proposed Project, as well as announcement of the Scoping Meeting's time, date and location. The website also includes County staff's contact information and IP Athos, LLC's, proposed site plan. The website will continue to provide Project information to the public throughout the application process. The website address is:

<http://planning.rctlma.org/Home/PlanningNotices/CUP180001PUP180001.aspx>

Email Address

Kevin White was the County Planner who was managing the EIR for the proposed Project at the time of scoping (he has since been replaced by Jason Killebrew). The Project website provided a direct link to Mr. White's email address, which was provided as another means of submitting comments on the scope and content of the EIR. Comments received by email will be considered in the EIR and have been incorporated into this scoping summary.

Distribution List

The County has compiled a Project-specific mailing list with over 205 entries. This list includes responsible and interested agencies, the County's 4th District Supervisor, the State Clearinghouse, tribal governments, all residents within 2,400 feet of the project boundaries, and individuals on the County's interested parties list.

The mailing list will be updated based on contact information from the comment letters received during the scoping comment period and from the Scoping Meeting sign-in sheets. This mailing or distribution list will continue to be used throughout the environmental review process for the Project to distribute public notices and will continue to be updated to ensure all interested parties are notified of key Project milestones.

Scoping Comments

A total of 10 commenters provided verbal comments during the Scoping Meeting. In addition, 15 written comment letters were submitted by mail or by email from public agencies, organizations, tribes, and private individuals. Table 1 lists all comment letters that were submitted during the scoping period along with a summary of the key comments. Table 2 lists the speakers at the Scoping Meeting and provides a similar summary of the key comments. Appendix C of this report includes copies of all comment letters in their original format.

Table 1. Summary of Written Scoping Comments			
Cmt No.	Date	From	Summary of Comments
A - Public Agencies, Written Comments			
A01	6/4/2018	California Department of Toxic Substances	<ul style="list-style-type: none"> • The EIR needs to determine whether current or historic uses of the site may have resulted in any release of hazardous wastes. • A Phase I Environmental Site Assessment might be needed. • If any environmental conditions are found to occur in the project area, sampling and remedial action should be conducted prior to construction. • Recommends evaluation, proper investigation, and mitigation for onsite areas with current or historic polychlorinated biphenyls (PCB)-containing transformers. • If soil contamination is suspected, the soil should be sample prior to export/disposal; and, if the soil is determined to be contaminated, it should be disposed of properly in accordance with all applicable laws and regulations. If the project requires importing soil to backfill excavated areas, proper evaluation should be conducted to ensure the imported soil is free of contamination. • If soil contamination is suspected during construction, then all construction should cease, and appropriate health and safety procedures should be implemented. • If it is determined that contaminated soil and/or groundwater exists, the EIR should identify how any required investigation and/or remediation will be conducted and the appropriate agency to provide regulatory oversight.
A02	6/5/2018	South Coast Air Quality Control District (SCAQMD)	<ul style="list-style-type: none"> • Requests a copy of the Draft EIR be sent directly to SCAQMD upon its completion. • Also send all appendices or technical documents related to air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files, including emission calculation spreadsheets and modeling input and output files (not PDF files), pursuant to the CEQA Guidelines Section 15174. • Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period. • Recommends the Lead Agency use the CEQA Air Quality Handbook (1993) as guidance when preparing the air quality analysis. • Recommends the Lead Agency use the CalEEMod land use emissions software available at www.caleemod.com. • Requests the Lead Agency quantify criteria pollutant emissions and compare the results to SCAQMD's CEQA regional pollutant emissions significance thresholds to determine impacts. • Recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LST) by either using the LSTs developed by SCAQMD or performing dispersion modeling as necessary. • The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project, including from indirect sources. • Recommends the Lead Agency perform a mobile source health risk assessment in the event the project would generate or attract vehicular trips, especially heavy-duty diesel-fueled vehicles. • An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should be included. • States the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective gives guidance on siting incompatible land uses and can be used as a general reference guide for reducing air pollution impacts. • States where to find guidance on strategies to reduce air pollution exposure near high-volume roadways. • States that CEQA requires that all feasible mitigation measures go beyond what is required by law be utilized during project construction and operation to

Table 1. Summary of Written Scoping Comments			
Cmt No.	Date	From	Summary of Comments
			<p>minimize these impacts; and, any impacts resulting from mitigation measures must also be discussed.</p> <ul style="list-style-type: none"> • SCAQMD notifies the Lead Agency of several resources useful for identifying potential mitigation measures for the project. • Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project. • If the project requires a permit from SCAQMD, then SCAQMD should be identified as a Responsible Agency. • SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated, and any significant impacts are mitigated where feasible.
A03	6/11/2018	United States Fish and Wildlife Service	<ul style="list-style-type: none"> • Federal trust resources to likely occur in the project area include the threatened Mojave desert tortoise, endangered Yuma clapper rail and Yuma Ridgway's rail, endangered southwestern willow flycatcher, and endangered yellow-billed cuckoo. • Other sensitive resources include the golden eagle and the western burrowing owl. • Comments are made based on familiarity with the locations for other large solar projects. • Recommends conducting appropriate protocol surveys so USFWS can more effectively advise the County of potential impacts. • Recommends representatives of the County and the applicant meet with BLM, USFWS, and California Department of Fish and Wildlife (CDFW) to discuss jurisdiction. • Suggest standard measures to avoid, minimize, and mitigate project impacts to Federal trust resources • Offers to further refine site-specific measures as more information becomes available.
B – Group, Organizations, & Companies, Written Comments			
No comments.			
C - Tribal Governments, Written Comments			
C01	5/29/2018	Twenty-Nine Palms Band of Missions Indians #1	<ul style="list-style-type: none"> • The Twenty-Nine Palms Band of Mission Indians Tribal Historic Preservation Office was aware of over 75 cultural resources within 1-mile of the Project area, as previously stated in a letter May 2, 2018. • The Project is in the vicinity of a culturally sensitive site and within the Chemehuevi Traditional Use Area. • The Project would have significant impacts on potential cultural resources that concern the Twenty-Nine Palms Band of Mission Indians. • The EIR should identify and evaluate the potential for the Project to adversely affect archaeological and historical resources. • A Phase II and III Cultural Resource Investigation should be done • Recommends creating a mitigation monitoring plan with input and participation from the consulting Tribes. • Requests copies of all available or forthcoming reports and noticed in regard to the project.
C02	6/7/2018	Twenty-Nine Palms Band of Missions Indians #2	<ul style="list-style-type: none"> • Since the previous correspondence, the Twenty-Nine Palms Band of Missions Indians became aware of 2 resources in the study area that fit into the category of a Tribal Cultural Resource (TCR). • Requests the updated cultural report with shapefiles and DPR reports of the new resources recorded. Once this documentation is received, the THPO will provide further recommendations. • Recommends a comprehensive Visual Impact Assessment emphasizing the visual effects that may compromise the integrity of cultural resources and TCRs. Representatives from the consulting Tribe(s) should be able to accompany the firm conducting the Visual Impact Assessment.

Table 1. Summary of Written Scoping Comments			
Cmt No.	Date	From	Summary of Comments
D - Private Citizens, Written comments			
D01	5/17/2018	Behrooz Mehri	<ul style="list-style-type: none"> Received the Notice regarding permit No. 180001. States that personal property looks to be in the middle of the proposed Project. Requests a way to view online or to receive digital copies of the proposed Project's plans.
D02	5/29/2018	Stephen Luth #1	<ul style="list-style-type: none"> Stephen Luth states he is a disabled Vietnam Veteran and suffers from post-traumatic stress disorder (PTSD). His residence is located on APNs 811-260-07, 811-260-08, and 811-260-09 and he has lived there for 30 years. Due to his PTSD, noise and movement around him is very difficult – he moved to the Desert Center to get away from city chaos. It will be difficult for him to have this Project located so close to him. Hopes to find a solution that will benefit all parties.
D03	6/5/2018	John Beach	<ul style="list-style-type: none"> Stated that Steve Jones is the county manager of Desert Center, and he can set up a local meeting at the community center, if interested. Suggested the meeting could be held at Lake Tamarisk, and that the winter is the best time because of the "snowbirds." There are four other nearby major projects that may coincide with construction: <ul style="list-style-type: none"> Eagle Crest Energy Pumped Storage Project, Eagle Mountain (former Kaiser mine site) Palen Solar Energy Project, Corn Springs Road (10 miles east of Desert Center) Desert Harvest Solar Energy Project, Kaiser Road (immediately south of Desert Sunlight Solar Energy Plant) Interstate 10 Upgrade & Repair, Desert Center to Blythe (\$400 million Caltrans budget) NextEra Energy of Juno Beach also has more work planned close to the McCoy and Blythe Solar Energy Plants north of Blythe Airport, somewhat outside of the immediate area.
D04	6/5/2018	Johnney Coon #1	<ul style="list-style-type: none"> Concerned about how the Project will affect him, his community, the environment, and the wildlife. There is only one access road he and his neighbors use and it is already being negatively impacted by the environmental studies crews. Concerned about the access road not being open during an emergency, and whose responsibility it is to maintain the road. Concerned about the migratory and other birds flying into the panels due to the fact that it may look like a lake. Curious about what will happen to the displaced animals, loss of habitat, and loss of migration patterns due to the Project. Concerned about massive water use lowering the water table and the Project interfering with their right to water. Concerned about flash floods and curious about any plans regarding this issue. Concerned about noise from the transmission lines and the on-site building throughout the Project area. Curious about the plans to mitigate noise and light pollution (they have very dark nights) and the aesthetic impacts. Will the Project add to the heat already felt in the area? Will the Project affect the next generation? Concerned about trash and proper waste disposal in the Project area. States that a positive of the Project is that it will be on already disturbed land, not on pristine desert land.

Table 1. Summary of Written Scoping Comments			
Cmt No.	Date	From	Summary of Comments
D05	6/1/2018	Jerry and Christine Samons	<ul style="list-style-type: none"> • State that they received the Notice from Riverside County and that it was the very first notice they received about the Project. • They agree that the Project would affect their property in Desert Center and state their opposition to the Project. • The Project is 2,000 feet from their 80-acre date ranch and would prevent them, from the quiet enjoyment of their property. • Do not want their access to be infringed upon in any way and provided a map of their property in reference to the proposed Project and the access road to Rice Road Hwy 177. • Concerned about the short amount of time between the notice, the public meeting, and the comment period. • Concerned about wildlife, birds, brightness, aesthetic impacts, and safety impacts due to the glare. • States a similar project is off of Interstate 15 near Prim, NV and it causes glare problems that affect drivers nearby. • Concerned that the new California law requiring new builds to have solar panels will make this project obsolete.
D06	6/6/2018	Stephen Luth #2	<ul style="list-style-type: none"> • Letter from Just Atchison on behalf of Steven Luth. • Concerned about physical impacts including: Dust that could trigger asthma in Esther Luth, noise and traffic that would cause severe stress to Steven Luth due to his PTSD, view from their home and use of open spaces, devaluation of home, and probability of being forced to move due to these physical impacts. • Concerned about environmental impacts: Flooding, berm destruction, increased heat, endangering wildlife (kangaroo rats, desert iguanas), increase snake problem as they migrate, and access from the home during emergencies (flash flood). • Notes attention to the fact that Steven Luth is a Vietnam Veteran with a Purple Heart. • States that Steven and Esther Luth just paid off their property in March 2018 and have lived at the property year-round for 30 years. • Requests communication with Steven and Esther go through Judy Atchison. • Requests a link to the map that also shows APNs 811-260-007, 811-260-008, and 811-260-009.
D07	6/11/2018	June Capp	<ul style="list-style-type: none"> • Concerns about the Project causing several issues in her area. • The increase tillage since the solar plant started being built blows silt and dirt. • Concerned the water diversions may cause runoff to flood their property and neighbors' properties. • Major rains caused land and access road damage. • Concerned about the excess of blowing silt that cannot be plowed into the ground or contained by wetting it. • States that after the rerouting of the water flow, the family and animals have suffered from allergies that they did not have in the past. • States the mud left something that is affecting plants and trees. • Questions what the plan is to mitigate the effect that the lines, substation, and inverters may have on the people, such as those who have pacemakers like her son). • Concerned about effects on their health due to the continuous buzzing of the lines and continuous lighting day and night. • Concerned for the wildlife and their habitat, including mountain lions, deer, big horn sheep, badger, coyote, fox, iguanas, snakes, lizards, buzzards, dove, geese, ducks, local birds, and desert turtles. • Concerned about water usage the solar plant is going to require. • Concerned about the Project's effect on the current drought conditions and lowering water table. • Concerned about the Project's impacts to roads. • Two lane roads on Hwy 177 are dangerous with a multitude of trucks on it. • Requests to be placed on mailing list.

Table 1. Summary of Written Scoping Comments			
Cmt No.	Date	From	Summary of Comments
D08	6/11/2018	Johnney Coon #2	<ul style="list-style-type: none"> • Stated that her and her husband have been in Desert Center for 42 years. • Concerned about birds crashing into panels. Are their mitigation measures for this? • Concerned about displaced animals, animal deaths, loss of habitat, and loss of migration and corridor patterns. Proposed fencing with large enough opening to let the small animals pass through. • Concerned about the project further dropping the water table and the effect it will have on the local population. Residents maintain their own pumps and wells; would there be compensation for the need to lower them? • Concerned about water diversions and flash flooding. Who would be responsible for providing and maintaining berms to protect residents? • Concerned about noise pollution since the substation will be right next to them. • Requests the substation be moved to the west of the gen-tie/project access road for there are no neighbors over there. • Concerned about her and her husband WHIP wildlife pond on their property and its proximity to the substation. • Concerned about transmission lines or substation having a negative effect on people with pacemakers. • Concerned about light pollution. Requests no to little lights around the Project to protect the moonless nights in the area. • Concerned about dust, especially during construction. States that asthma and respiratory issues are on the rise. • Concerned about heat generation and reflections issues. • Concerned about road access and maintenance. The only access road to their property is being used by those performing environmental studies for the Project. Also quotes a notice from the planning department on 5/9/2018 which states, "the applicant is also seeking to vacate interior roadways and merge contiguous project parcels." • Concerned about trash from workers and construction • Concerned about quality of life and aesthetics. • Requests that the issues are addressed in good faith to lessen the impacts of the Project and be a good neighbor.
D09	6/11/2018	Sharon Davis	<ul style="list-style-type: none"> • Submitted description and Plat Plan of the Green Acres Mobil Home Park, and recommended the property as a project staging site.
D10	7/17/18	Mark and Katrina Hedberg	<ul style="list-style-type: none"> • Supports clean renewable energy • Owns date farm and concerned that current zoning will be changed for surrounding properties, which could include height limits and setbacks for the date trees • Concerned about heat and reflection on agriculture, which could damage trees • Concerned about property access • Questions why their parcel was not considered for inclusion in the Project

Table 2. Summary of Oral Scoping Comments			
Cmt No.	Date	From	Summary of Comments
E - Scoping Meeting, Oral Comments (June 4, 2018)			
E01	6/4/18	Judy Atchison	<ul style="list-style-type: none"> • Residents suffer from PTSD and asthma, so are concerned about noise, dust and traffic • Cited visual concerns, because will be surrounded by proposed solar panels • Other concerns include property value impacts, and the cost of having to move • Requested a map with parcels, which Ken Baez said is on the County website

Table 2. Summary of Oral Scoping Comments			
Cmt No.	Date	From	Summary of Comments
E02	6/4/18	Johnney Coon	<ul style="list-style-type: none"> • Concerns about impacts to Loma Verde Road, which could preclude property access. Said that specialists performing environmental studies are already causing deterioration. Loma Verde Road also becomes a “river” in big rain events and this is the only access to their property. • Concerns about impacts to wildlife, including “lake effect” impacts of migratory and other birds flying into panels (people are calling the area Lake Chuckwalla) and from the blockage of wildlife corridors, especially with other projects in the area • Emergency access concerns with impacts to road conditions • Concerns about water use and groundwater supply, as well as water diversions and flash flooding • Concerns about corona noise from transmission lines and from solar facility buildings • Light pollution concerns • Concerns about heat generation and increase in temperatures from installation of solar panels • Trash and waste disposal concerns • Concerns about visual impacts • Supports use of already-disturbed lands
E03	6/4/18	Ann Richmond	<ul style="list-style-type: none"> • Concerns about access to her property
E04	6/4/18	Jeff Harvey, Eagle Crest Energy Company	<ul style="list-style-type: none"> • Concerned about the right-of-way of the Eagle Crest transmission line through several proposed Project parcels • Stated that federal approval is required by the Federal Energy Regulatory Commission (FERC) in addition to the U.S. Bureau of Land Management, so it doesn't interfere with a federally licensed project.
E05	6/4/18	Arthur Samons	<ul style="list-style-type: none"> • Access and ROW concerns • Land use concerns about access to game bird hunting areas northwest of the proposed Project • Concerns about impacts to desert tortoise • Concerns about flood control • Chuckwalla Raceway is noisy, so wondered if the panels could interfere and possibly amplify the racetrack noise
E06	6/4/18	Chris Braun	<ul style="list-style-type: none"> • Neutral on the project • Concerned about an increase in traffic accidents on Interstate 10 as travelers may take their eyes off the road to view the solar facility • Concerned about reflective (glare) issues for drivers on the Chuckwalla Raceway from the solar panels
E07	6/4/18	Rena Van Fleet, Colorado River Indian Tribes	<ul style="list-style-type: none"> • CRIT would like to be advised when the archaeological walkover will happen • Corridors in the area between Red Bluff Substation and Eagle Mountain are sacred to the Mojave Tribe, so they would like to be updated on the proposed Project
E08	6/4/18	Vince Samons	<ul style="list-style-type: none"> • Asked whether there is a chance that existing SCE power lines that go through the properties could be pulled out
E09	6/4/18	John Richards	<ul style="list-style-type: none"> • Summarized issues raised, namely property access concerns along unpaved roadways in the Project area due to use by construction workers and heavy equipment, during flooding/rain events and from an increase in windblown dust • Asked who will maintain the perimeter roads around the solar facility site parcels • Summarized concerns associated with rerouting of power lines, if applicable to the Project • Flood/drainage concerns if existing berms would be removed
E10	6/4/18	Unknown (no speaker registration card submitted)	<ul style="list-style-type: none"> • Concerns about how many people will be involved in construction and where the construction workers will live and shop

Appendix A:
Notice of Preparation
(filed with the State Clearinghouse on May 11, 2018)

Appendix B:
Scoping Meeting Materials

Appendix C
Written Comment Letters Received During Scoping Period

Appendix A:
Notice of Preparation
(filed with the State Clearinghouse on May 11, 2018)



RIVERSIDE COUNTY PLANNING DEPARTMENT

Charissa Leach, P.E.
Assistant Director of TLMA

Notice of Preparation of an Draft Environmental Impact Report

Date: May 11, 2018

To: Responsible and Trustee Agencies, Interested Organizations, and Individuals.

Project Title/Case No Athos Renewable Energy Project - Draft Environmental Impact Report
Conditional Use Permit No. 180001/ Public Use Permit No. 180001

Project Location: The Athos Renewable Energy Project is located in Riverside County, north of Interstate 10 (I-10) and approximately 4 miles east and northeast of the Desert Center Community. The Project consists of 65 parcels on private land, the APNs of which are listed on the attached sheet titled "Assessor's Parcels for the Athos Renewable Energy Project." A 220 kilovolt (kV) generation tie (gen-tie) transmission line would be located both north and south of the I-10 freeway to connect the facility into the existing Southern California Edison (SCE) Red Bluff 500/220 kV Substation. The solar facility site is located within the County of Riverside's jurisdiction. The 220 kV gen-tie line would traverse mainly BLM-administered public lands.

Project Description: IP Athos, LLC ("Applicant"), a subsidiary of Intersect Power, proposes to construct, operate, and decommission the Athos Renewable Energy Project, which includes a large 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, a PV solar power plant and 11-mile-long 220 kV gen-tie transmission line, would be located on approximately 3,400 acres across 7 non-contiguous groups of parcels northeast of the community of Desert Center. The Project would consist of a solar fields, inverters, powerlines, 4 substations, an O&M Building, access roads, telecommunications facilities, and related equipment. The facility would generate and provide storage for 500 megawatts (MW) of renewable energy using PV technology. The power produced by the Project would be conveyed to the statewide power grid via interconnection to the SCE Red Bluff Substation, an existing substation located south of I-10 and approximately 1.1 miles south of the Project area. As part of the Project, the applicant is also seeking to vacate interior roadways and merge contiguous project parcels. Roads along the project perimeter on the solar facility lands would remain dedicated public access.

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit guidance from your agency as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but not later than thirty (30) days after receiving this notice.

Probable Environmental effects of the project: *The County of Riverside has determined that an Environmental Impact Report (EIR) shall be prepared to address the potential significant impacts of the proposed Athos Renewable Energy Project. As a result, the probable environmental impacts that will be analyzed as part of the EIR include:*

Riverside Office • 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 • Fax (951) 955-1811

Desert Office • 77-588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 • Fax (760) 863-7555

Aesthetics/Visual Resources/Reflection

Air Quality

Cultural Resources and Paleontological Resources

Greenhouse Gas Emissions

Hydrology and Water Quality

Noise

Traffic and Transportation

Agricultural Resources

Biological Resources

Geology and Soils

Hazards and Hazardous Materials

Land Use and Planning

Population and Housing / Socioeconomics

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).

LEAD AGENCY:

Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Attn: Kevin White, Project Planner

PROJECT SPONSOR:

Applicant: IP Athos, LLC
Address: 548 Market Street # 68743
San Francisco, CA 94104-5401

PUBLIC SCOPING MEETING

Because the Project meets the CEQA Guidelines §15206 definition of a project having statewide, regional, or area-wide significance, the County of Riverside will hold a scoping meeting as specified in CEQA Guidelines §15082. The scoping meeting will be held at:

County of Riverside – Desert Office
77-588 El Duna Court, Suite H
Palm Desert, CA 92211
June 4, 2018 at 1:30 p.m.

If you have any questions, please contact Kevin White at **(951) 955-1417** or by email at **KEWhite@rivco.org**.

Sincerely,

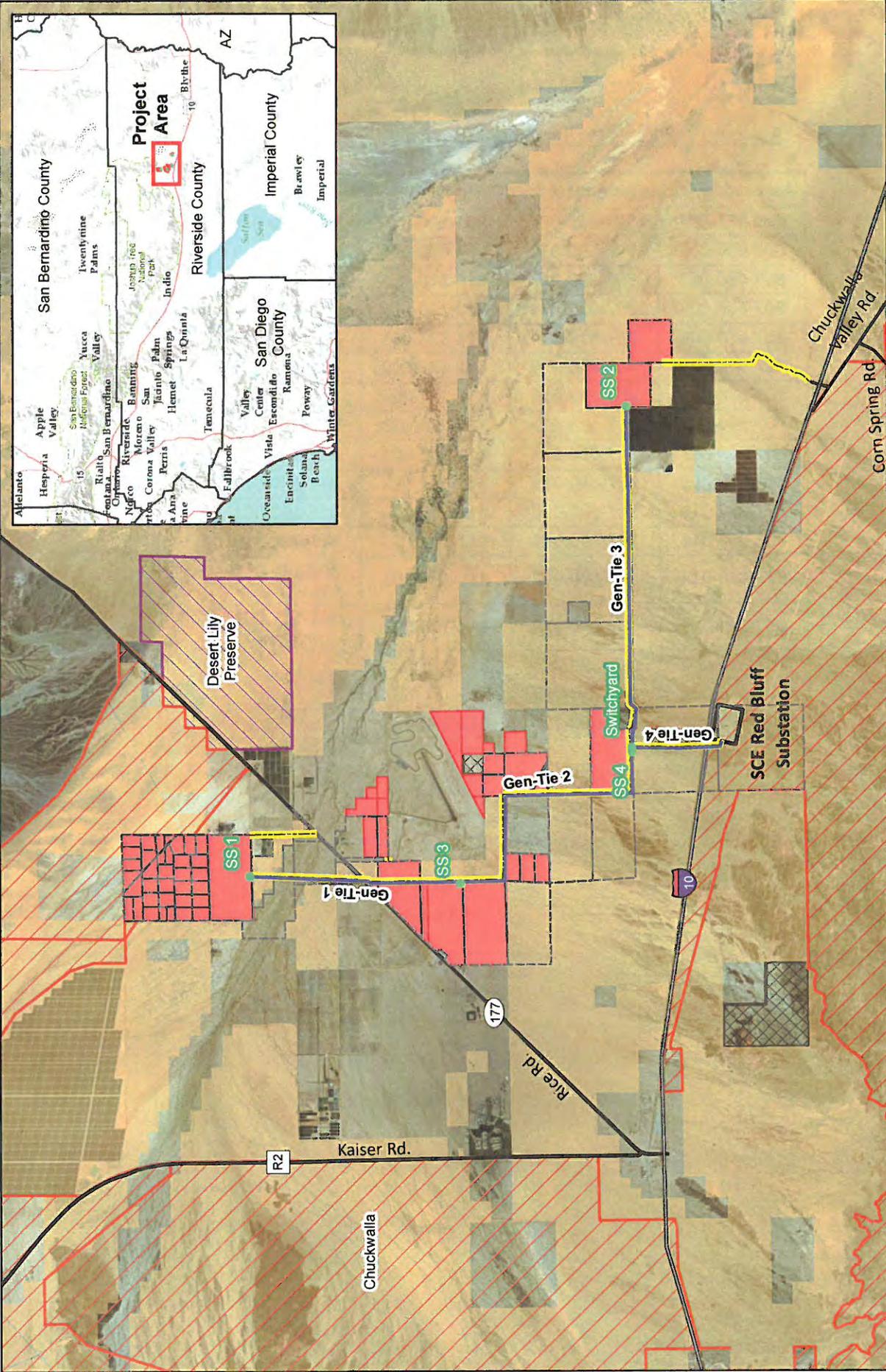
RIVERSIDE COUNTY PLANNING DEPARTMENT
Charissa Leach, P.E., Assistant Director of TLMA



Kevin White, Project Planner

Assessor's Parcels for the Athos Renewable Energy Project.

Assessor's Parcels for Project Site (CUP 180001 & PUP 180001)			
807-191-004	807-690-004	807-690-027	811-170-009
807-680-001	807-690-011	807-690-028	811-170-013
807-680-002	807-690-012	810-110-001	811-180-001
807-680-003	807-690-013	810-110-006	811-180-002
807-680-004	807-690-014	811-122-001	811-180-003
807-680-005	807-690-015	811-122-002	811-180-004
807-680-006	807-690-016	811-122-009	811-180-005
807-680-007	807-690-017	811-130-010	811-180-013
807-680-008	807-690-018	811-142-005	811-180-014
807-680-009	807-690-019	811-142-006	811-180-024
807-680-010	807-690-020	811-142-007	811-190-001
807-680-011	807-690-021	811-142-015	811-260-013
807-680-012	807-690-022	811-150-001	807-191-031 (gen-tie only)
807-680-013	807-690-023	811-150-002	811-121-003 (gen-tie only)
807-690-001	807-690-024	811-170-002	
807-690-002	807-690-025	811-170-007	
807-690-003	807-690-026	811-170-008	

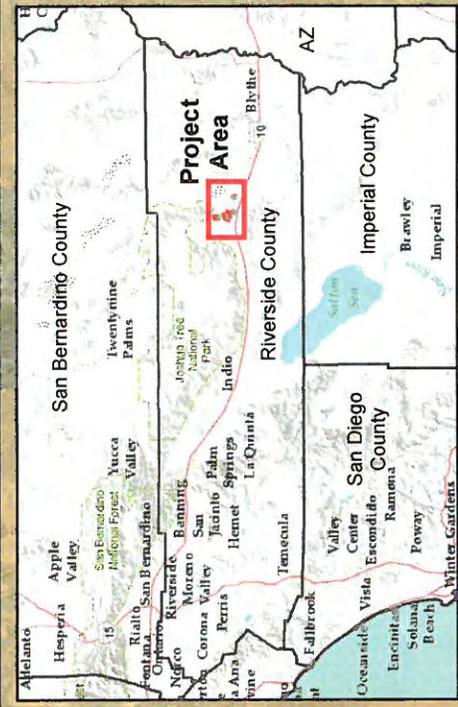


1:100,000

0 1 2 Miles

- Proposed Gen-Tie
- Substation
- Solar Facility (Private Land)
- Project Access Road
- Desert Lily Preserve
- Chuckwalla ACEC (on BLM Land only)
- Bureau of Land Management
- CA State Lands Commission
- Parcel Line

Athos Renewable Energy Project Area



Appendix B:
Scoping Meeting Materials

SIGN IN

Athos Renewable Energy Project

Scoping Meeting – Monday, June 4, 2018, Riverside County Planning Department

PLEASE PRINT CLEARLY

Name:* Marisa Mitchell	Affiliation (if any): Applicant		
Address:*	City:*	State:	Zip:
Email Address: marisa@intersectpower.com	Prefer to receive notices via email? → <input checked="" type="checkbox"/>		
Name:* Noelle Ronan	Affiliation (if any): USFWS		
Address:* 777 E. Tahquitz Canyon Way, Suite 205, Palm Springs	City:* Palm Springs	State: CA	Zip: 92264
Email Address: noelle_ronan@fws.gov	Prefer to receive notices via email? → <input type="checkbox"/>		
Name:* Jenness McBride	Affiliation (if any): USFWS		
Address:* 777 E Tahquitz Canyon Way	City:* Palm Springs	State: CA	Zip: 92262
Email Address: jenness-mcbride@fws.gov	Prefer to receive notices via email? → <input checked="" type="checkbox"/>		
Name:* J. Disney Coon & Timothy Anderson	Affiliation (if any):		
Address:* P.O. Box 436 Desert Center CA 92239	City:* Desert Center	State: CA	Zip: 92239
Email Address: jcoon0313@gmail.com	Prefer to receive notices via email? → <input checked="" type="checkbox"/>		
Name:* JEFF HARVEY	Affiliation (if any): EAGLE CREST ENERGY CO.		
Address:*	City:*	State:	Zip:
Email Address: harvey-jeff@sbcglobal.net	Prefer to receive notices via email? → <input checked="" type="checkbox"/>		
Name:* CHRIS BRAIN	Affiliation (if any): Desert Center Kamesha		
Address:* 43 Camino Res	City:* Rancho Mirage	State: CA	Zip: 92270
Email Address: advinture@gmail.com	Prefer to receive notices via email? → <input checked="" type="checkbox"/>		

*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety

SIGN IN

Athos Renewable Energy Project

Scoping Meeting – Monday, June 4, 2018, Riverside County Planning Department

PLEASE PRINT CLEARLY

Name:* Sharon L. DAVIS	Affiliation (if any): Green Acres / Desert Center CA		
Address:* 83 Sunset	City:*	State:	Zip:
Email Address: Sldavis63379@charter.net	Prefer to receive notices via email? → <input type="checkbox"/>		
Name:* RICHARD W. ZEILER	Affiliation (if any): OWNER - "GREEN ACRES"		
Address:* 639 S GRANITE ST	City:*	State:	Zip:
Email Address: ORANGE, CA 92666	Prefer to receive notices via email? → <input type="checkbox"/>		
Name:* JOHN BEACH	Affiliation (if any):		
Address:* PO Box 91	City:*	State:	Zip:
Email Address: jbeach1950@gmail.com	DESERT CENTER	CA	92239
			Prefer to receive notices via email? → <input checked="" type="checkbox"/>
Name:* Richard D. Lashmit	Affiliation (if any): Global Organics		
Address:* 26301 Rice Rd.	City:*	State:	Zip:
Email Address: richarddelashmit@gmail.com	Desert Center	CA	92239
			Prefer to receive notices via email? → <input checked="" type="checkbox"/>
Name:* Arthur Samois	Affiliation (if any): Wilder Palms Date Ranch		
Address:* 1511 Marita Dr.	City:*	State:	Zip:
Email Address: Arthur_Samois@NPS.GOV	Beulah City	NV	89005
			Prefer to receive notices via email? → <input checked="" type="checkbox"/>
Name:* Vince Samois	Affiliation (if any): Landowner		
Address:* 69215 Buck Dr.	City:*	State:	Zip:
Email Address: Vince.Samois@ucr.edu	Mountain Center	CA	92561
			Prefer to receive notices via email? → <input type="checkbox"/>

*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

SIGN IN

Athos Renewable Energy Project

Scoping Meeting – Monday, June 4, 2018, Riverside County Planning Department

PLEASE PRINT CLEARLY

Name:* JR Chiriaco		Affiliation (if any): Property owner h.t.	
Address:* 62450 Chiriaco Rd		City:* Chiriaco Summit	State: Zip: CA 92201
Email Address: JRCBOB@yahoo.com		Prefer to receive notices via email? → <input checked="" type="checkbox"/>	
Name:* MARGIT F. CHIRIACO RUSCHÉ		Affiliation (if any): Neighbor	
Address:* 62450 CHIRIACO ROAD		City:* CHIRIACO SUMMIT	State: Zip: CA 92201
Email Address: MCHIRIACOR@AOL.COM		Prefer to receive notices via email? → <input type="checkbox"/>	
Name:* Steve H. Jones		Affiliation (if any): Property Owner	
Address:* PO Box 246		City:* Desert Center	State: Zip: CA 92239
Email Address: SteveJB460@Earthlink.net		Prefer to receive notices via email? → <input checked="" type="checkbox"/>	
Name:* Ann Richmond		Affiliation (if any): Property Owner	
Address:* P.O. Box 1387		City:* Riverside	State: Zip: CA 92502
Email Address: ann@vanbrinc.com		Prefer to receive notices via email? → <input checked="" type="checkbox"/>	
Name:* Calvin Lott		Affiliation (if any):	
Address:* PO Box 272		City:* Desert Center	State: Zip: CA 92502
Email Address: dad@dc.rr.com		Prefer to receive notices via email? → <input type="checkbox"/>	
Name:* Rena Van Fleet		Affiliation (if any): Colorado River Indian Tribes	
Address:* 26600 Mohave Road		City:* Parker	State: Zip: AZ 85344
Email Address: rena.vanfleet@crit-nsn.gov		Prefer to receive notices via email? → <input checked="" type="checkbox"/>	

*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety

Both email & mail

SPEAKER IDENTIFICATION FORM
Riverside County Planning Commission or Director's Hearing

Submit request at Planning Commission to the Hearing Secretary or at Director's Hearing to the Case Planner.

Speakers are permitted to be heard up to three (3) minutes, subject to Public Hearing Rules listed on the reverse side of this form.

Date: 6-4-18 Agenda #: 91

SPEAKER'S NAME: Ann Richmond
(Print Name)

Address: _____
(Only required if follow-up mail response is requested)

City: _____ Zip: _____

Phone #: _____ Email: _____

I AM:

- The Applicant Applicant's Representative
 A Neighbor Other Interested Party
 The Appellant Respondent

PLEASE STATE YOUR POSITION BELOW:

- I wish to speak I DO NOT wish to speak

Position on Agenda Item:

- In Favor Neutral Opposed

I give my 3 minutes to: _____

SPEAKER IDENTIFICATION FORM
Riverside County Planning Commission or Director's Hearing

**Submit request at Planning Commission to the Hearing Secretary or
at Director's Hearing to the Case Planner.**

**Speakers are permitted to be heard up to three (3) minutes, subject
to Public Hearing Rules listed on the reverse side of this form.**

Date: 06/09/18 Agenda #: 4.0

SPEAKER'S NAME: JEFF HARVEY
(Print Name)

Address: _____
(Only required if follow-up mail response is requested)

City: INDIO Zip: 92203

Phone #: _____ Email: harvey-jeff@sbglobal.net

I AM:

- | | |
|--|--|
| <input type="checkbox"/> The Applicant | <input type="checkbox"/> Applicant's Representative |
| <input type="checkbox"/> A Neighbor | <input checked="" type="checkbox"/> Other Interested Party |
| <input type="checkbox"/> The Appellant | <input type="checkbox"/> Respondent |

PLEASE STATE YOUR POSITION BELOW:

- I wish to speak I DO NOT wish to speak

Position on Agenda Item:

- In Favor Neutral Opposed

I give my 3 minutes to: _____

SPEAKER IDENTIFICATION FORM
Riverside County Planning Commission or Director's Hearing

**Submit request at Planning Commission to the Hearing Secretary or
at Director's Hearing to the Case Planner.**

**Speakers are permitted to be heard up to three (3) minutes, subject
to Public Hearing Rules listed on the reverse side of this form.**

Date: 6-4-18 Agenda #: _____

SPEAKER'S NAME: Arthur Samois
(Print Name)

Address: 1511 Marita Dr.
(Only required if follow-up mail response is requested)

City: Boulder City, NV Zip: 89005

Phone #: 702-575-8770 Email: Arthur_Samois@NPS.gov

I AM:

- | | |
|---|---|
| <input checked="" type="checkbox"/> The Applicant | <input type="checkbox"/> Applicant's Representative |
| <input type="checkbox"/> A Neighbor | <input type="checkbox"/> Other Interested Party |
| <input type="checkbox"/> The Appellant | <input type="checkbox"/> Respondent |

PLEASE STATE YOUR POSITION BELOW:

- | | |
|---|---|
| <input checked="" type="checkbox"/> I wish to speak | <input type="checkbox"/> I DO NOT wish to speak |
|---|---|

Position on Agenda Item:

- | | | |
|-----------------------------------|---|----------------------------------|
| <input type="checkbox"/> In Favor | <input checked="" type="checkbox"/> Neutral | <input type="checkbox"/> Opposed |
|-----------------------------------|---|----------------------------------|

I give my 3 minutes to: _____

SPEAKER IDENTIFICATION FORM
Riverside County Planning Commission or Director's Hearing

Submit request at Planning Commission to the Hearing Secretary or at Director's Hearing to the Case Planner.

Speakers are permitted to be heard up to three (3) minutes, subject to Public Hearing Rules listed on the reverse side of this form.

Date: June 9, 2018 Agenda #: 4.1

SPEAKER'S NAME: CARIS BRAUN
(Print Name)

Address: _____
(Only required if follow-up mail response is requested)

City: _____ Zip: _____

Phone #: _____ Email: _____

I AM:

- The Applicant Applicant's Representative
 A Neighbor Other Interested Party
 The Appellant Respondent

PLEASE STATE YOUR POSITION BELOW:

- I wish to speak I DO NOT wish to speak

Position on Agenda Item:

- In Favor Neutral Opposed

I give my 3 minutes to: _____

SPEAKER IDENTIFICATION FORM
Riverside County Planning Commission or Director's Hearing

Submit request at Planning Commission to the Hearing Secretary or at Director's Hearing to the Case Planner.

Speakers are permitted to be heard up to three (3) minutes, subject to Public Hearing Rules listed on the reverse side of this form.

Date: 06/04/2018 Agenda #: 4.1

SPEAKER'S NAME: RENA VAN Fleet
(Print Name)

Address: _____
(Only required if follow-up mail response is requested)

City: Parker Zip: 85344

Phone #: (928) 216-0408 Email: rena.vanfleet@CRIT-NSN.GOV

I AM:

- | | |
|--|--|
| <input type="checkbox"/> The Applicant | <input type="checkbox"/> Applicant's Representative |
| <input type="checkbox"/> A Neighbor | <input checked="" type="checkbox"/> Other Interested Party |
| <input type="checkbox"/> The Appellant | <input type="checkbox"/> Respondent |

PLEASE STATE YOUR POSITION BELOW:

- | | |
|---|---|
| <input checked="" type="checkbox"/> I wish to speak | <input type="checkbox"/> I DO NOT wish to speak |
|---|---|

Position on Agenda Item:

- | | | |
|-----------------------------------|---|----------------------------------|
| <input type="checkbox"/> In Favor | <input checked="" type="checkbox"/> Neutral | <input type="checkbox"/> Opposed |
|-----------------------------------|---|----------------------------------|

I give my 3 minutes to: _____

SPEAKER IDENTIFICATION FORM
Riverside County Planning Commission or Director's Hearing

Submit request at Planning Commission to the Hearing Secretary or at Director's Hearing to the Case Planner.

Speakers are permitted to be heard up to three (3) minutes, subject to Public Hearing Rules listed on the reverse side of this form.

Date: 6/4 Agenda #: 4.1

SPEAKER'S NAME: John R. [Signature]
(Print Name)

Address: _____
(Only required if follow-up mail response is requested)

City: _____ Zip: _____

Phone #: _____ Email: _____

- I AM:
- The Applicant
 - Applicant's Representative
 - A Neighbor
 - Other Interested Party
 - The Appellant
 - Respondent

PLEASE STATE YOUR POSITION BELOW:

I wish to speak I DO NOT wish to speak

Position on Agenda Item:

In Favor Neutral Opposed

I give my 3 minutes to: _____

SPEAKER IDENTIFICATION FORM
Riverside County Planning Commission or Director's Hearing

Submit request at Planning Commission to the Hearing Secretary or at Director's Hearing to the Case Planner.

Speakers are permitted to be heard up to three (3) minutes, subject to Public Hearing Rules listed on the reverse side of this form.

Date: 6-4-2018 Agenda #: _____

SPEAKER'S NAME: Vince Samons
(Print Name)

Address: 69215 Buck Dr.
(Only required if follow-up mail response is requested)

City: Mountain Center Zip: 92561

Phone #: 760 349-9077 Email: Gmail@dategrove.com

- I AM:
- The Applicant
 - Applicant's Representative
 - A Neighbor
 - Other Interested Party
 - The Appellant
 - Respondent

PLEASE STATE YOUR POSITION BELOW:

I wish to speak I DO NOT wish to speak

Position on Agenda Item:

In Favor Neutral Opposed

I give my 3 minutes to: _____

SPEAKER IDENTIFICATION FORM
Riverside County Planning Commission or Director's Hearing

Submit request at Planning Commission to the Hearing Secretary or at Director's Hearing to the Case Planner.

Speakers are permitted to be heard up to three (3) minutes, subject to Public Hearing Rules listed on the reverse side of this form.

Date: 5-4-18 Agenda #: Solar

SPEAKER'S NAME: Johnney Coon
(Print Name)

Address: 23-379 Rice Rd
(Only required if follow-up mail response is requested)

City: Desert Center Zip: 92239

Phone #: 760-485-6807 Email: jcoon0313@gmail.com

- I AM:
- The Applicant Applicant's Representative
- A Neighbor Other Interested Party
- The Appellant Respondent

PLEASE STATE YOUR POSITION BELOW:

- I wish to speak I DO NOT wish to speak

- Position on Agenda Item:
- In Favor Neutral Opposed

I give my 3 minutes to: Tony Andes
Using 3 minutes from

SPEAKER IDENTIFICATION FORM
Riverside County Planning Commission or Director's Hearing

Submit request at Planning Commission to the Hearing Secretary or at Director's Hearing to the Case Planner.

Speakers are permitted to be heard up to three (3) minutes, subject to Public Hearing Rules listed on the reverse side of this form.

Date: 5-4-18 Agenda #: _____

SPEAKER'S NAME: Johnney Tony Andes
(Print Name)

Address: 23-375 Rice Rd
(Only required if follow-up mail response is requested)

City: Desert Center CA Zip: 92398

Phone #: 760 227 9291 Email: TJ Andes @ gmail.com

- I AM:
- The Applicant Applicant's Representative
- A Neighbor Other Interested Party
- The Appellant Respondent

PLEASE STATE YOUR POSITION BELOW:

- I wish to speak I DO NOT wish to speak

- Position on Agenda Item:
- In Favor Neutral Opposed

I give my 3 minutes to: Johnney Coon

Rep. Steven & Esther Luth

SPEAKER IDENTIFICATION FORM
Riverside County Planning Commission or Director's Hearing

Submit request at Planning Commission to the Hearing Secretary or at Director's Hearing to the Case Planner.

Speakers are permitted to be heard up to three (3) minutes, subject to Public Hearing Rules listed on the reverse side of this form.

Date: 6/4/18 Agenda #: solar panel 4.0
pro - Desert
Center

SPEAKER'S NAME: Judy Atchison
(Print Name)

Address: 1127-B Stone Pine Lane
(Only required if follow-up mail response is requested)

City: Corona Zip: 92879

Phone #: 909 633 7292 Email: jatchison909@gmail.com

I AM:

- The Applicant
- Applicant's Representative
- A Neighbor
- Other Interested Party
- The Appellant
- Respondent

PLEASE STATE YOUR POSITION BELOW:

- I wish to speak
- I DO NOT wish to speak

Position on Agenda Item:

- In Favor
- Neutral
- Opposed

I give my 3 minutes to: _____

IP Athos Renewable Energy Project



RIVERSIDE COUNTY
PLANNING DEPARTMENT

Public Scoping Meeting

June 4, 2018

Meeting Agenda

- **Welcome and Introduction**
- **Purpose of Scoping**
- **CEQA Process**
- **Description of the Proposed Project**
- **Riverside County Process**
- **Public Comments**

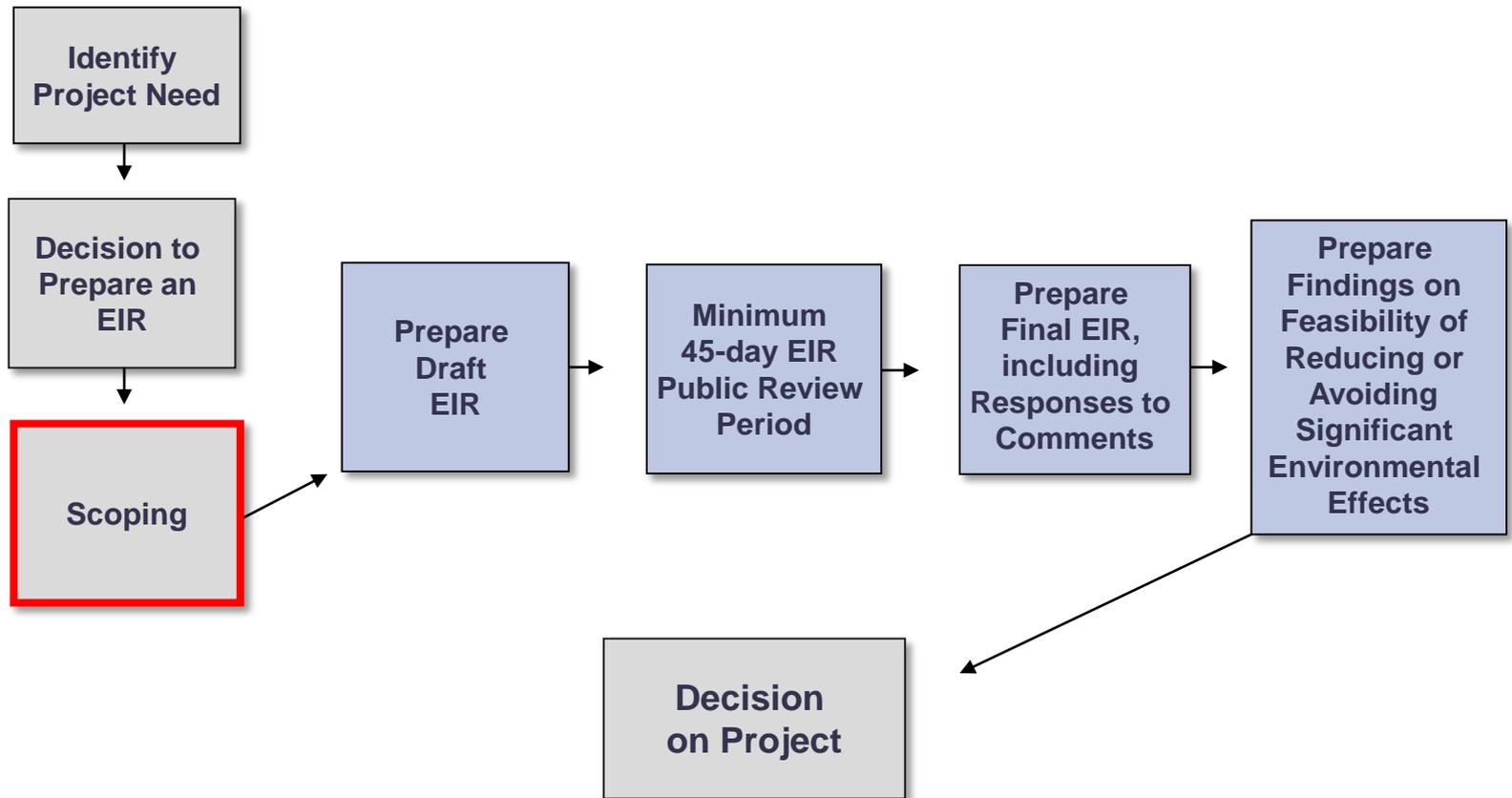
Key Players and their Roles in the CEQA Process

- **Riverside County Planning Department:**
Lead Agency under California Environmental Quality Act (CEQA)
- **IP Athos, LLC:**
The Applicant
- **Aspen Environmental Group:**
Environmental Consultant for Riverside County

The Purpose of Scoping

- To inform the public and responsible agencies about an upcoming project for which an EIR will be prepared
- To inform the public about the environmental review process
- To solicit input regarding potential alternatives to the proposed project and the appropriate scope of issues to be studied in the environmental document
- To identify issues of concern and areas of potential controversy

CEQA Process



General Purpose and Content of an Environmental Document

■ Purpose:

- Provide technically sound information for decision-makers to consider in evaluating the proposed project

■ Content:

- Describe the environmental setting of the project area
- Disclose potential environmental impacts of the project and alternatives
- Propose measures to reduce or avoid significant environmental impacts (mitigation measures)

Initial Study Analysis

Environmental Issue Areas

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

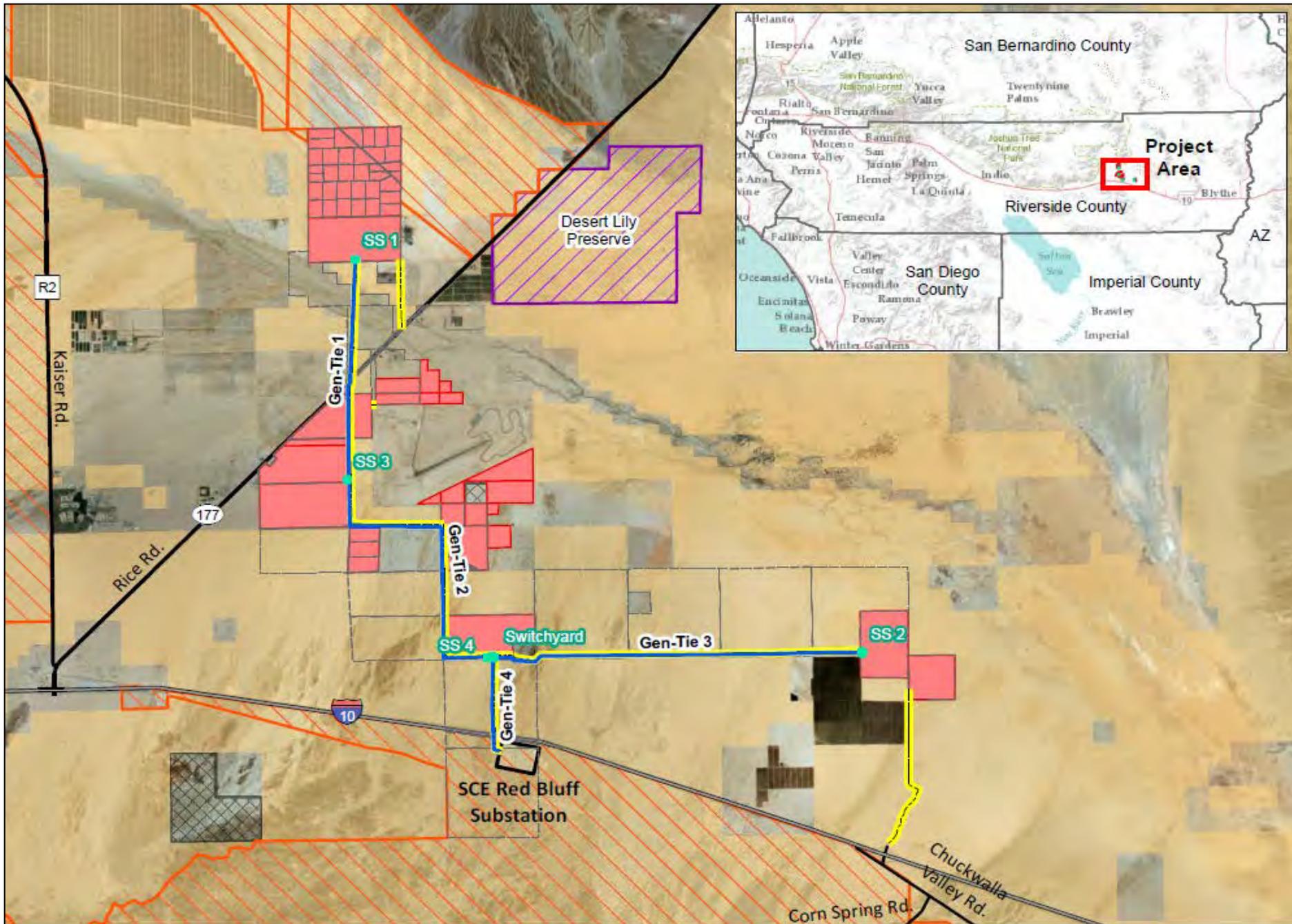
Applicant's Project Objectives

- Assist Californians in meeting their renewable energy generation goals under Senate Bill 350 and greenhouse gas emissions reduction goals of the California Global Warming Solutions Act (AB 32), as amended by Senate Bill 32 in 2016;
- Bring living-wage jobs to eastern Riverside County;
- Make the highest and best use of primarily disturbed, retired agricultural land in and around a federal “Solar Energy Zone” and “Development Focus Area” to generate, store, and transmit affordable, wholesale solar electricity.

Proposed Project

- **Solar Facility** (3,228 total acres, private land)
 - Solar array field with single-axis solar PV trackers
 - Inverters
 - Collector power lines (34.5 kilovolt [kV])
 - Up to 4 onsite substations and switchyards
 - O&M building
 - SCADA and telecommunications facilities.
 - Meteorological data collection system
 - Battery or flywheel storage system
 - Several interior access roads
 - Vacate interior roadways & merge contiguous project parcels
- **220 kV Gen-Tie Transmission Lines**
(11 miles, private and BLM-administered land)
 - Connect solar facility parcels with SCE Red Bluff Substation

Athos Proposed Project Area



What's Next?

- Public scoping period will be held from **May 11 through June 11, 2018.**
 - All public comments will be reviewed.
 - Environmental issues raised will be addressed in the EIR.
- Following review of public scoping comments, the County will prepare an EIR to be released for public review and comment.

Environmental Review Schedule

Activity	Date
IP filed a CUP Application	January 30, 2018
County issued Completeness Letter	March 13, 2018
IP filed PUP Application (under County review)	April 16, 2018
Notice of Preparation of an Environmental Document	May 11, 2018
Public Review of Draft Environmental Document <ul style="list-style-type: none">• At least 45-day comment period	Fall 2018 **
Final Environmental Document	Early 2019 **
County Planning Board Hearing	Early/Mid 2019 ** (**Estimated)

Scoping Comments

The most useful scoping comments:

1. Identify potential environmental concerns regarding the proposed project
2. Identify issues where the proposed project would not result in impacts
3. Recommend alternatives that would avoid or reduce impacts of the proposed project
4. Provide in writing

Comments

Please send comments by June 11th to:

Kevin White
Riverside County Planning Department
4080 Lemon Street, 12 Floor
Riverside, CA 92501

or

Email: **kewhite@rivco.org**

Please be sure to include your name, address, and email or phone number on all comments.



Thank You for Your Input!

Appendix C
Written Comment Letters Received During Scoping Period



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

June 4, 2018

Mr. Kevin White
Project Planner
Riverside County Planning Department
4080 Lemon St., 12th Floor
P.O. Box 1409
Riverside, California 92502-1409
KEWhite@rico.org

NOTICE OF PREPARATION (NOP) OF AN ENVIRONMENTAL IMPACT REPORT (EIR) FOR ATHOS RENEWABLE ENERGY PROJECT, CONDITIONAL USE PERMIT NO, 18-0001, LOCATED AT EAST AND WEST OF RICE ROAD AND SOUTH OF INTERSTATE FREEWAY 10 SOUTH, RIVERSIDE COUNTY (SCH# 2018051034)

Dear Mr. White:

The Department of Toxic Substances Control (DTSC) has reviewed the subject NOP. The following project description is stated in the NOP: "IP Athos, LLC ("Applicant"), a subsidiary of Intersect Power, proposes to construct, operate, and decommission the Athos Renewable Energy Project, which includes a large 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, a PV solar power plant and 11-mile-long 220 kV gen-tie transmission line, would be located on approximately 3,400 acres across 7 non-contiguous groups of parcels northeast of the community of Desert Center. The Project would consist of a solar fields, inverters, powerlines, 4 substations, an O&M Building, access roads, telecommunications facilities, and related equipment. The facility would generate and provide storage for 500 megawatts (MW) of renewable energy using PV technology."

Based on the review of the submitted document, DTSC has the following comments:

1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

Mr. Kevin White
June 4, 2018
Page 2

2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
3. The NOP states, "The Project consists of 65 parcels on private land, the APNs of which are listed on the attached sheet titled "Assessor's Parcels for the Athos Renewable Energy Project. A 220 kV generation tie (gen-tie) transmission line would be located both north and south of the 1-10 freeway to connect the facility into the existing Southern California Edison (SCE) Red Bluff 500/220 kV Substation." DTSC recommends evaluation, proper investigation and mitigation, if necessary, on onsite areas with current or historic polychlorinated biphenyls (PCB)-containing transformers.
4. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if the project proposes to import soil to backfill the excavated areas, proper evaluation and/or sampling should be conducted to make sure that the imported soil is free of contamination.
5. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted and the appropriate government agency to provide regulatory oversight.

If you have any questions regarding this letter, please contact me at (714) 484-5380 or by email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,



Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program – Cypress

kl/sh/ja

cc: See next page.

Mr. Kevin White
June 4, 2018
Page 3

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2018051034



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

June 5, 2018

KEWhite@rivco.org

Kevin White, Project Manager
Riverside County Planning Department
4080 Lemon Street, 12th Floor/P.O. Box 1409
Riverside, CA 92502-1409

**Notice of Preparation of a Draft Environmental Impact Report for the
Athos Renewable Energy Project
(Conditional Use Permit No. 180001/Public Use Permit No. 180001)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 of SCAQMD's CEQA Air Quality Handbook
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as Responsible Agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD's webpage at: <http://www.aqmd.gov>.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

RVC180516-04

Control Number



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Palm Springs Fish and Wildlife Office
777 East Tahquitz Canyon Way, Suite 208
Palm Springs, California 92262



In Reply Refer To:
FWS-ERIV-18B0223-18CPA0233

June 11, 2018
Sent by email

Mr. Kevin White
Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, California 92501

Subject: Athos Renewable Energy Project, Notice of Preparation of a Draft Environmental Impact Report, Conditional Use Permit No. 180001/Public Use Permit No. 180001, Riverside County, California

Dear Mr. White:

The U.S. Fish and Wildlife Service (Service) provides for your information our comments on the scope and content of the environmental analysis to be included in a draft Environmental Impact Report (EIR), as solicited in the County of Riverside's May 9, 2018, Notice of Preparation (NOP) under the California Environmental Quality Act. IP Athos, LLC (the applicant), a subsidiary of Intersect Power, proposes to construct, operate, and decommission the Athos Renewable Energy Project north of Interstate 10 (I-10), approximately 4 miles east of the Desert Center Community in eastern Riverside County.

The proposed Athos project is a utility-scale solar photovoltaic (PV) electrical generating and storage facility with a 220 kilovolt (kV) generation tie (gen-tie) transmission line. The solar facility would be located on approximately 3,400 acres across seven non-contiguous groups of privately owned parcels within the County's jurisdiction, and would generate and provide storage for 500 megawatts (MW) of renewable energy. The 11-mile-long gen-tie transmission line would traverse lands mainly administered by the Bureau of Land Management (BLM) both north and south of I-10 to connect the facility into the existing Southern California Edison Red Bluff 500/220 kV Substation.

The Service's mission is working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people. We offer our comments on this project according to authorities of the Department of the Interior, including our legal responsibility for threatened and endangered animals and plants listed under the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*). Federal trust resources that likely occur in the project area include the threatened Mojave desert tortoise (*Gopherus agassizii*); endangered Yuma clapper rail (*Rallus longirostris yumanensis*),

recently renamed Yuma Ridgway's rail (*Rallus obsoletus yumanensis*) by the American Ornithologists Union; endangered southwestern willow flycatcher (*Empidonax traillii extimus*); and endangered western distinct population segment of yellow-billed cuckoo (*Coccyzus americanus*). Other sensitive species in the project vicinity include golden eagle (*Aquila chrysaetos*) and western burrowing owl (*Athene cunicularia*).

We have received no habitat assessment information about the proposed Athos project. Our comments are based on our familiarity with the locations for other large solar projects in the vicinity, such as the existing Desert Sunlight Project to the northwest and the proposed Palen Solar Project to the east. Biological assessments for those projects indicated potential impacts to the Federal trust resources identified above, which we assume would be similar to potential impacts at the proposed Athos site. We recommend that the applicant conduct appropriate protocol surveys at the project site so that we may more effectively advise the County of potential impacts to ESA-listed species and other sensitive resources; recommend measures to avoid, minimize, and mitigate project impacts to them; and facilitate the applicant's compliance with the ESA. We also recommend that representatives of the County and the applicant meet with BLM, the Service, and the California Department of Fish and Wildlife (CDFW) to discuss how BLM's jurisdiction over the proposed location for the ge-tie transmission line would interface with the County's jurisdiction over the private lands for the solar facility.

To assist you with developing the draft EIR, we offer our standard comments for utility-scale solar projects, which suggest standard measures to avoid, minimize, and mitigate project impacts to Federal trust resources. We would be glad to work with you to refine site-specific measures for the Athos site as more information becomes available during the planning process.

Mojave Desert Tortoise

Surveys at the Desert Sunlight and Palen solar projects found suitable desert tortoise habitat inhabited by the species in low densities. Accordingly, we assume the proposed Athos site also provides available habitat for desert tortoise, which the applicant should confirm through onsite habitat assessment and pre-construction protocol surveys for desert tortoise conducted according to the Service's most recent survey guidelines. Habitat assessment should include evaluation of linkage habitat that may provide important connectivity for desert tortoise and other desert species to available habitat outside the proposed project site. Because construction and operation of the Athos project would result in permanent elimination or degradation of 3,400 acres of desert tortoise habitat, we recommend that the County require a suite of avoidance, minimization, and mitigation measures as permit terms and conditions to offset any adverse effects to desert tortoise. We recommend that the draft EIR describe the results of habitat and protocol surveys for desert tortoise, and specify that the applicant would implement general conservation measures for desert tortoise that include, but are not limited to, the following:

- Retain an onsite designated biologist, authorized desert tortoise biologists, and biological monitors,
- Develop and present a worker environmental awareness program;
- and Implement site-specific impact avoidance and minimization measures.
- Conduct desert tortoise clearance surveys, construct exclusion fencing, and develop and implement a desert tortoise translocation plan, as necessary;
- and Compensate for desert tortoise habitat eliminated by the project.
- Manage and monitor the presence of common ravens (*Corvus corax*) onsite, and contribute a per-acre fee to the Service's Regional Common Raven Management Program (see below).

We recommend that the draft EIR evaluate the impacts to desert tortoise associated with increasing numbers of common ravens. Human development in the desert, including solar facilities, typically leads to a local increase in the number of common ravens, which prey on desert tortoises. Ravens are highly attracted to human activity, which “subsidizes” more ravens by providing new food sources and sites for nesting, roosting, and perching. Therefore, to reduce project impacts on desert tortoises from common ravens that may be attracted to the project site, we recommend that the County require the applicant to establish on-site measures to eliminate or minimize the availability of subsidies and discourage the potential for common ravens to occupy the site during all project phases, including construction, operation, and maintenance. In addition, the draft EIR should evaluate the effects of any local increase in raven numbers at the project site to desert tortoises elsewhere, as these birds travel long distances on a daily basis between roosting and foraging sites. To address these indirect and cumulative effects, we recommend that the County require the applicant to contribute a per-acre fee to the Service's Regional Common Raven Management Program; please contact our office for more information on this regional plan.

Yuma Ridgway's Rail and Other Listed Birds

Breeding Yuma Ridgway's rail populations in southeastern California are primarily restricted to freshwater marshes along the lower Colorado River Valley and near the Salton Sea, although the species has been observed sporadically in desert locations. Available data suggest that solar facilities in the desert pose a hazard to which various rail species and other water-associated birds are particularly vulnerable. To date, we know that two Yuma Ridgway's rails have been killed at solar PV projects, one at the Desert Sunlight project in May 2013 and one in Imperial County in April 2014. Vulnerability of the Ridgway's rail also is evidenced by several incidentally observed fatalities of sora (*Porzana carolina*) and Virginia rail (*Rallus limicola*) at solar and transmission projects along the I-10 corridor and in the Imperial Valley. These data indicate a risk of mortality to all rail species caused by project-related features such as gen-tie lines, solar panels, and perimeter fencing.

We are concerned that utility-scale solar and transmission projects within the resident and dispersal range of Yuma Ridgway's rail may result in multiple fatalities over the life span of these projects, especially given the large cumulative disturbance footprint of existing and planned projects in the California desert. Because of the large size of these projects and the apparent lack of effective adaptive management measures and other design modifications sufficient to avoid the risk of incidental take¹, we anticipate recurrent but low levels of take of Yuma Ridgway's rail at various project sites. Therefore, we recommend the draft EIR address the risk of take to Yuma Ridgway's rail, considering the direct, indirect, and cumulative effects of the Athos project to this endangered species. We also recommend the project include a risk analysis, monitoring program, and a range of avoidance, minimization, and mitigation measures (see below).

We are concerned that the proposed Athos project would increase fatalities of other listed birds (southwestern willow flycatcher, yellow-billed cuckoo) and non-listed sensitive species (golden eagle, burrowing owl), which are known to breed and migrate in riparian habitats in the project vicinity and westward through the Coachella Valley and beyond. Dead willow flycatchers and yellow-billed cuckoos have been documented on or near existing solar projects in the California desert within their migratory range yet distant from suitable habitat. Therefore, the draft EIR should include a rigorous analysis to determine the vulnerability of all avian taxa that could occur at the project site, with a risk assessment that quantifies potential fatalities and incidental take of listed species. This risk analysis should be based on a robust program of post-construction monitoring (see below).

Non-listed Migratory Birds

In general, systematically-collected mortality monitoring data for utility-scale solar facilities are limited and the magnitude of potential impacts has not yet been accurately quantified. However, such projects currently under construction or recently put into operation are reporting incidental observations of fatalities and injuries to a wide range of avian species due to various features such as solar panels, evaporation ponds, fencing, distribution lines within the facility, and gen-tie lines. There is growing recognition that "polarized light pollution" or a "lake effect" presents a particular hazard to water-associated birds and other species seeking aquatic migratory stopover habitat. Therefore, we recommend that the County require the applicant to design and construct any aboveground electrical lines to reduce powerline bird collisions and the likelihood of electrocution of large birds, such as raptors. Please consult the guidance of the Avian Powerline Interaction Committee (APLIC) for options to reduce bird collisions and electrocutions at powerlines.

Given these multiple sources of bird hazards at solar facilities, we recommend that the draft EIR thoroughly address the risk potential on project-specific as well as cumulative scales. To help the applicant reduce potential adverse effects to avian species, we encourage the applicant to develop

¹"Take" is defined by the ESA as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct.

and implement a statistically robust, systematic avian monitoring program as a component of a project-specific Bird and Bat Conservation Strategy (BBCS), which should be analyzed as part of the draft EIR. The draft EIR also should include an adaptive management program that outlines the implementation and success of various bird deterrents during the construction and operational phases of the project. We advise you that mortality monitoring typically requires carcass collection, which must be authorized by a Special Purpose Utility Permit (SPUT). We encourage the County and applicant to begin the SPUT application process as early as possible to allow us to issue a permit prior to the onset of construction. Please contact us for BBCS guidance and SPUT permit requirements. We would also be glad to work with you and the applicant to develop and implement options for appropriate mitigation of avian impacts.

Cumulative Effects

We understand that many applications are in process for utility-scale solar and wind energy projects on public and private lands to meet California renewable energy priorities. The draft EIR should consider the acreage already lost to solar development along the I-10 solar corridor, and the acreage reasonably certain to occur as future development. Given the extent of existing and proposed renewable energy projects in the vicinity, we recommend that the draft EIR include a thorough analysis of all direct, indirect, and cumulative effects of the proposed Athos project. The Service is particularly concerned about impacts to desert tortoise habitat connectivity and the potential loss of gene flow within and among designated critical habitat units across the species' range. Therefore, the draft EIR should examine potential impacts to the population connectivity requirements of desert tortoise and other wildlife species throughout the project area and its vicinity.

In addition to the minimization and mitigation measures discussed above, we recommend that the draft EIR include the following standard measures for utility-scale solar projects:

- Analyze a range of alternatives, such as a reduced-footprint alternative that would minimize adverse effects to avian and other wildlife species.
- Eliminate any water features, such as evaporation ponds.
- Retain natural vegetation as much as possible beneath the solar panels.
- Place onsite distribution lines and gen-tie lines underground or use monopoles.
- For any above-ground distribution and gen-tie lines, install visual deterrents to minimize avian collisions.
- Investigate ways to modify solar panels to break-up any illusion of a large water body, especially at night.
- Mark fences or install deterrents to reduce avian collisions.
- Avoid use of lattice-type structures or placing external ladders and platforms on any infrastructure to minimize perching and nesting.
- Avoid use of guy wires on meteorological towers.
- Avoid night-time lighting to the extent possible and focus any necessary lighting downward to reduce sky illumination.

- Minimize permanent disturbance area by limiting construction of new roads, and by reducing vegetation clearing and grading wherever possible.
- Develop and implement a Nesting Bird Plan that establishes methods and timing for vegetation clearing to protect active nests.
- Survey for golden eagle nests any year when construction occurs during the nesting season.
- Conduct pre-construction clearance surveys for burrowing owls and implement standard burrowing owl mitigation guidelines in coordination with the Service and CDFW.
- Conduct mandatory site training for all construction personnel regarding avoidance of bird nests, bat colonies, and other biological resources.

If you have any questions about our comments, please contact Noelle Ronan of my staff at (760-322-2070, extension 407; noelle_ronan@fws.gov). We would be glad to provide additional information.

Sincerely,

JENNESS MCBRIDE  Digitally signed by JENNESS
MCBRIDE
Date: 2018.06.11 12:08:51 -0700

For Kennon A. Corey
Assistant Field Supervisor

cc:

Magdalena Rodriguez, CDFW
Brandon Anderson, BLM



TWENTY-NINE PALMS BAND OF MISSION INDIANS

46-200 Harrison Place . Coachella, California . 92236 . Ph. 760.863.2444 . Fax: 760.863.2449

May 29, 2018

Heather Thomson, Archaeologist
Riverside County Planning Department
4080 Lemon St., 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409

RE: Athos Renewable Energy Project – Draft Environmental Impact Report Conditional Use Permit No. 180001/Public Use Permit No. 180001

Dear Ms. Thomson,

This letter is in regards to continued consultation in compliance with AB 52 (California Public Resources Code § 21080.3.1) and CEQA (California Environmental Quality Act) for CUP 180001. This project entails the construction of a 220 kilovolt (kV) generation tie (gen-tie) transmission line. As stated in our letter sent May 2nd, 2018, the Twenty-Nine Palms Band of Mission Indians Tribal Historic Preservation Office (THPO) was aware of over 75 cultural resources within 1-mile of the project area that may be impacted by the construction that may take place. Additionally, the project is in the vicinity of a culturally sensitive site and within the Chemehuevi Traditional Use Area (TUA). For these reasons, the project could have significant impacts on potential cultural resources that concern the Twenty-Nine Palms Band of Mission Indians (Tribe).

Since there are numerous cultural resources in the vicinity of the project the Environmental Impact Report (EIR) should identify and evaluate the potential for the project to adversely affect archaeological and historical resources in the project area. This should include a Phase II and III Cultural Resource Investigation to identify resources and define site boundaries within the project area and to evaluate if there are any cultural resources eligible for inclusion in the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR). Additionally, a mitigation and monitoring plan is recommended to be created; with input and participation from the consulting Tribe(s). As stated in our previous correspondence, the THPO requests copies of all available or forthcoming reports and notices in regards to this project.

The Tribe and THPO look forward to working with Riverside County on this project. If you have any questions, please do not hesitate to contact the Tribal Historic Preservation Office at (760) 775-3259 or by email: TNPConsultation@29palmsbomi-nsn.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anthony Madrigal, Jr.", is written over a light blue circular stamp.

Anthony Madrigal, Jr.
Tribal Historic Preservation Officer

cc: Darrell Mike, Twenty-Nine Palms Tribal Chairman
Sarah Bliss, Twenty-Nine Palms Cultural Resources Manager
Kevin White, Riverside County Planning Department

Email: Athos Renewable Energy Project EIR Team

From: Sarah Bliss [<mailto:sbliss@spotlight29.com>]
Sent: Thursday, June 07, 2018 10:55 AM
To: 'Evan Mills' <emills@appliedearthworks.com>
Cc: TNP Consultation <TNPConsultation@29palmsbomi-nsn.gov>; Thomson, Heather <HTHOMSON@RIVCO.ORG>
Subject: RE: Scoping Letter for Athos Renewable Energy Project

Hello Evan,

The Twentynine Palms Band of Mission Indians (Tribe) has been in consultation under the California Environmental Quality Act (CEQA) with the Riverside County Planning Department for the Athos Renewable Energy Project. In our previous correspondence, the Tribe has noted a substantial number of cultural resources within the vicinity of the project. Additionally, in this previous correspondence, the Twenty-Nine Palms Band of Mission Indians Tribal Historic Preservation Office (THPO) was not aware of any additional cultural resources or any Tribal Cultural Resources, as defined California Public Resources Code § 21074 (a) (1) (A)-(B) within the project area. However, there are two (2) resources in the study area (within the 5-mile buffer) that fit into the category of a Tribal Cultural Resource (TCR) defined as sites, features, places, cultural landscapes, sacred places, and objects that have cultural value to the Tribe. Since the project has had an updated layout from our previous correspondence with the lead agency, the THPO requests the updated cultural report with shapefiles and DPR reports of the new resources recorded. Once the Tribe receives this documentation, the THPO will provide further recommendations to the Lead Agency.

Additionally, because of the increased project footprint and its vicinity to culturally sensitive areas to the Tribe, the THPO recommends a comprehensive Visual Impact Assessment. This assessment should emphasize the visual effects that may compromise the integrity of cultural resources and TCRs. Representatives from the consulting Tribe(s) should be able to accompany the firm conducting the Visual Impact Assessment.

If you have any questions, please do not hesitate to contact the Tribal Historic Preservation Office at (760) 775-3259 or by email: TNPConsultation@29palmsbomi-nsn.gov.

Thank you,

Sarah Bliss

Twenty-Nine Palms Band of Mission Indians
Cultural Resources Manager
46-200 Harrison Place, Coachella, CA 92236
Ofc: (760) 863-2489
Cell: (760) 702-0679
E-mail: sbliss@29palmsbomi-nsn.gov



Email: Athos Renewable Energy Project EIR Team

From: Behrooz Mehri [<mailto:behrooz.inc@gmail.com>]

Sent: Thursday, May 17, 2018 2:59 PM

To: White, Kevin C. <KEwhite@rivco.org>

Subject: Athos Renewable Energy Project

Hi Kevin,

I received the Notice regarding permit No. 180001. It looks like my property sits somewhere in the middle of the proposed project.

Is there any chance of viewing online or receiving a digital copy of the proposed project's plans?

I am attaching a screen shot of the notice I received for your convenience.

Thanks!

Behrooz Mehri
858-689 4142

To whom it may concern,

I am a disabled Vietnam Veteran and I suffer from Post traumatic stress disorder. My residence is located on Parcel # 811-260-07, 811-260-08, 811-260-09. I have lived here for over 30 years. Noise and movement around me is very difficult. I moved to Desert Center, to be away from the city chaos. It will be very difficult for me to handle this project being located right on top of me. We need to come up with a solution that will be beneficial to both parties.

Stephen Luth
25750 Rice road
Desert Center, Ca. 92239
760-533-4682

From: John Beach
To: [Hedy Koczwar](#); [Marisa Mitchell](#)
Subject: Athos Solar Energy Project - Desert Center
Date: Tuesday, June 5, 2018 8:42:15 AM

Good morning, Hedy and Marisa -

Thank you for the meeting yesterday, and we look forward to learning about the project as it proceeds. Steve Jones was there - he's the county manager for Desert Center - and if you are interested in holding a meeting locally, he can set that up at the community center at Lake Tamarisk. Other projects have done this and the best time is during the winter, when the snowbirds are here.

Four other nearby major projects that may coincide with your construction (not news to you, just a recap):

- Eagle Crest Energy Pumped Storage Project, Eagle Mountain (former Kaiser mine site)
- Palen Solar Energy Project, Corn Springs Road (10 miles east of Desert Center)
- Desert Harvest Solar Energy Project, Kaiser Road (immediately south of Desert Sunlight Solar Energy Plant)
- Interstate 10 Upgrade & Repair, Desert Center to Blythe (\$400 million Caltrans budget)

My former employer, NextEra Energy of Juno Beach, Florida, has more work planned close to the McCoy and Blythe Solar Energy Plants north of Blythe Airport, but that is somewhat out of the immediate area.

Marisa - I didn't think to say yesterday, but Kaye Paugh may have been one of your English teachers at Paly - she and her husband Bob are good friends of mine.

On the last day of the Genesis Solar Energy Project (March 2014), at Ford Dry Lake midway between Desert Center and Blythe, I took the photo below. There were only three or four of us left after a construction peak of 1100 or so. Unlikely there will ever be another parabolic trough project, at least in the US, since the cost of PV has come down so much and the construction is "order of magnitude" simpler.

John



Johnney Coon
P.O. Box 436
Desert Center, CA. 92239
760-485-6807

My name is Johnney Coon. I've lived in Desert Center for 42 years. I live right next to this proposed large scale solar site.

I'm concerned about a variety of issues & how they will effect me, my neighbors, the environment & the wildlife.

We are already being impacted by the use of the dirt road, we depend on, by the people you employ to do the environmental studies. This is the only road we have to get to & from our home. We have to locate & often pay someone to fix it for us, as we no longer have a tractor. We have almost gotten stuck in the sand on this road due to the people who are doing these studies. We depend on this road for everything including for fuel & water deliveries, ect. If it is not passable then we are stuck. What if we have an emergency?

Are you going to maintain this road to keep it passable for us?

I'm very concerned about the migratory birds or any birds flying into the panels. The other large scale solar project in this valley looks just like a lake at certain times of the day. I know theres a problem

with birds flying into these panels & dying.

What about the displaced animals, loss of habitat & loss of migration patterns. Are wildlife just supposed to go around all of these projects? How will that affect their hunt for food, mating, etc?

Water use is a big issue. You can't live in the desert without it or anywhere. We maintain our own well & pump. As you will probably use vast sums of water for this project, how do you intend to deal with the local population & our right to water. What happens when our ^{water} table drops due to your usage? Do you have any remedies in place or thoughts on this?

What about water diversion during flash floods? Your solar fields will likely change the current flow of water during flash flooding. Are these projects going to flood us? What do you intend to do about this very real possibility?

I know residents are bothered by the transmission line noise. What about those on site buildings located throughout the solar fields? I've heard that they produce a constant noise.

So what do you intend to do about

Noise & light pollution? We have very dark nights. You can see the Milky Way & so much more during moonless nights. Are we going to lose that ability?

What about heat generation? Will this project add to the already oppressive heat we have in the summer?

Trash is another concern. People don't seem to have much respect for the environment & properly disposing of their waste. This would probably be an easy one to deal with. Please are you able to make sure your workers don't further trash the desert.

Last but not least is the quality of life issue & aesthetics. I'm sure you realize this will affect us greatly, in particular, because we are right next to the largest proposed project. As I said I came here 42 yrs ago because it was peaceful, quiet & with very few people around. I see all that being slowly destroyed now. What can you do to lessen the impact that this project will have on us who have lived here so long?

One positive point regarding this proposal is that at least it will be on already disturbed land & not on pristine, undisturbed desert land.

Jerry & Christine Samons
69-215 Buck Drive
Mountain Center, CA 92561

June 1, 2018

Riverside County Planning Department
Attn: Kevin White, Project Planner
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409

Re: Athos Renewable Energy Project – Draft Environmental Impact Report Conditional Use Permit No. 180001/Public Use Permit No. 180001

Dear Mr. White,

We received a Public Hearing Notice from your office last week that stated boldly on the envelope that it may affect our property in Desert Center. We agree with that and hereby register our opposition to the Athos Project. This notice is the first we have received about this project.

- 1.) We definitely have concerns as our 80 acre date ranch is located less than 2000 feet from the proposed project. If this moves forward we believe that the solar project will absolutely prevent us from quiet enjoyment of our property.
- 2.) We do not want our access to be infringed upon or blocked in any way. Our property was purchased in 1965. On the view map I have marked our property in yellow and labeled the 320 and the 640 acre pieces. Our right-of-way runs along with the established SCE powerlines in from Rice Road or Hwy. 177.
- 3.) We plan to attend the June 4, 2018 meeting however feel pressed for time with just two weeks of notice on this project.
- 4.) It is common knowledge that these mega projects have problems by endangering wildlife and birds. No one wants to get close to these projects because they are bright, glaring and unattractive. Off of Interstate 15 near Prim, NV there is a large project of this type that turns with the sun and at certain times of the day causes a glare and problems for drivers nearby.
- 5.) Another consideration is that a new California law just went into effect requiring solar panels on every new house built going forward. That may quickly make these projects obsolete.

We look forward to discussing this matter further with you. If you have any questions, please call Jerry and Christine Samons at 760-349-9077.

Sincerely,


Jerry V. Samons
Christine Samons

Enclosures

SAMO'S property



640

320

Rice Road
July 177

MAG 995

MAG 717

WATER WELL DRILLERS REPORT

State Well No. _____

Other Well No. _____

(1) OWNER:

Name: **Desert Water Drilling Co. Inc.**
 Address: **133 N. Main St., Indio, Calif.**

(11) WELL LOG:

Total Depth	900	Depth of casing	150
Formation Described by depth			
0	45	Fine to Cor sand, gravel, shell blcks	
45	90	Fine to Cor sand, gravel thin strks clay	
90	112	Fine to Cor sand, gravel, blcks.	
112	135	Fine to Cor sand, cemented streaks	
135	177	Fine to Cor sand, gravel, thin strks clay	
177	191	Fine to Cor sand, gravel, cemented strk	
191	291	Fine to Cor sand, gravel, thin strks clay	
291	337	Fine to Cor sand - tight streaks	
337	359	Fine to Cor sand, strks brown sandy clay	
359	402	Brown sandy clay, strks fine to coarse sand	
402	425	Fine to Cor sand, thin strks brown clay	
425	560	Brown sandy clay, thin strks fine and medium sand	
560	583	Fine to Cor sand, gravel, thin strks clay	
583	605	Fine to Coarse sand	
605	673	Fine, medium sand, strks clay	
673	740	Fine to Cor sand, gravel, thin strks clay	
740	898	Fine to Cor sand, gravel, cemented strk	
898	943	Fine to Cor sand gravel; cemented thin streaks clay	

(2) LOCATION OF WELL:

County: **Riverside** Owner's number, if any: _____
 Township, Range, and Section: **NR2 NR2 Sec 36 T4S R15E**
 Distance from cities, roads, railroads, etc.: _____

(3) TYPE OF WORK (check):

New Well Deepening Reconditioning Destroying
 If destruction, describe material and procedure in Item 11.

(4) PROPOSED USE (check):

Domestic Industrial Municipal
 Irrigation Test Well Other

(5) EQUIPMENT:

Rotary
 Cable
 Other

(6) CASING INSTALLED:

STEEL: _____ OTHER: _____
 SINGLE DOUBLE

If gravel packed

From ft.	To ft.	Diam.	Gage or Wall	Diameter of Bore	From ft.	To ft.
0	216	16 ⁰⁰	1/4	20 ⁰⁰		
216	900	12 3/4	3/16		150	900

Size of shoe or well ring: _____

Size of gravel: **Bird eye**

Describe joint: **Collar**

(7) PERFORATIONS OR SCREEN:

Type of perforation or name of screen

From ft.	To ft.	Perf. per row	Rows per ft.	Size in. x in.
216	360			3/32
360	600			
672	900			

(8) CONSTRUCTION:

Was a surface sanitary seal provided? Yes No To what depth: **150** ft.

Were any strata sealed against pollution? Yes No If yes, note depth of strata

From _____ ft. to _____ ft.

From _____ ft. to _____ ft.

Method of sealing: **Standard Mud Slurry**

(9) WATER LEVELS:

Depth at which water was first found, if known _____ ft.

Standing level before perforating, if known _____ ft.

Standing level after perforating and developing: **105** ft.

(10) WELL TESTS:

Was pump test made? Yes No If yes, by whom? _____

Yield: _____ gal./min. with _____ ft. drawdown after _____ hrs.

Temperature of water _____ Was a chemical analysis made? Yes No

Was electric log made of well? Yes No If yes, attach copy

Work started **4/22** 19 **74**, Completed **5/24** 19 **74**

WELL DRILLER'S STATEMENT:

This well was drilled under my jurisdiction and this report is true to the best of my knowledge and belief.

NAME: **Desert Water Drilling Co. Inc.**

(Person, firm, or corporation) (Typed or printed)

Address: **P. O. Box 133, Indio, Calif. 92201**

[SIGNED] **2 B Brown**
 (Well Driller)

License No. **219051** Dated _____, 19____

SKETCH LOCATION OF WELL ON REVERSE SIDE

3/3

Email: Athos Renewable Energy Project EIR Team

From: Judy [<mailto:jjatchison909@gmail.com>]

Sent: Wednesday, June 06, 2018 9:28 AM

To: White, Kevin C. <KEwhite@rivco.org>

Subject: Desert Center renewable energy project

Good morning, this is Judy Atchison who spoke for Steven Luth at the Monday meeting in Palm Desert. Our comments regarding the environmental impact are as follows:

Physical impacts:

- Dust that could trigger asthma in Esther Luth
- Noise and traffic that could cause severe distress for Steven Luth due to existing diagnosis of PTSD
- View from home and use of open space ruined
- Financial concerns over devaluation of home and probability of being forced to move due to above physical impacts which would be very costly and stressful

Environmental impacts

- Flooding concerns, berm destruction
- Increased heat
- Wildlife: Kangaroo Rats already endangered, desert iguanas, increased snake problem as they migrate to property
- Rear access to exit the property when exit onto highway is not possible during a flash flood

Please note Steven Luth is a Viet Nam veteran with a Purple Heart. He and his wife just paid off their property in March 2018. This is their full-time home year-round and has been for the past 30 years.

Please communicate to Steven and Esther Luth through this email address. Also, please send a link to the map that shows parcel numbers and if possible, along with parcel numbers

811260007

811260008

811260009

Thank-you

Judy Atchison on behalf of Steven Luth
25940 Rice Road
Desert Center, Ca 92239
760-533-4682

Double JJ Capp Ranch
June Capp
P.O. Box 343, Desert Center, CA 92239
Phone: 760-227-3432

June 10, 2018

TO: Riverside County Planning Department
Kevin White, Project Planner
County of Riverside – Desert Office
P: 951-955-1417 – F: KEWhite@rivco.org

RE: Athos Renewable Energy Project - Draft Environmental Impact Report Conditional Use
PERMIT no. 180001/Public Use Permit No. 180001

FROM: June Capp, Double JJ Capp Ranch
Assessment Number – 811130011-0

I've lived in the Desert Center/Eagle Mountain area since 1956. We've begun to have unusual issues ever since the original solar plant started being built. Our area is dry and with the increase tillage and movement of the land blowing silt and dirt are an everyday occurrence. (Also, not appreciated since it affects our quality of life.)

We are also the low area in the valley so when the water course was and will be diverted, which you WILL do, the runoff floods my property as well as the other small land owners around me. The major rains caused land and access road damage. Because of this we are forced to live with excessive blowing silt. This does not plow into the ground nor does wetting it contain it. My family and I now suffer from allergies which we did not have until the rerouting of water flow. (This includes my horses, cat and dog. My husband had COPD which this aggravated.) Whatever the mud left has affected my plants and trees.

We have people in the area who have pacemakers including my son. How do you mitigate the affect of your lines, substations and inverters on these people? The continuous buzzing of the lines is detrimental to health. Continuous lighting, day and night is also an assault on our health. After all, we've been here almost 50 years

On my property I see mountain lions, deer, and big horn sheep as well as the occasional badger, regular coyote and fox. There are not many places for the animals to go for water or forage. Iguanas, snakes and a myriad of lizards are in the area along with migrating buzzards, dove, geese, ducks and local birds including hummingbirds. Let's not forget our desert turtles. Further destruction of their natural habitat should be of great concern.

What kind of water usage are the solar plants going to need for installation and upkeep? We've been in drought conditions for a number of years and the water table is dropping. How will your installation affect it?

What is this going to do to the roads? Will you keep them in good repair? With your construction the traffic will increase considerably. They are not currently prepared for it. Two lane roads on Highway 177 are dangerous with a multitude of trucks on it.

My concerns are as listed. Please place me on your mailing list.

-----Original Message-----

From: Johnney Coon [mailto:jcoon0313@gmail.com]

Sent: Monday, June 11, 2018 11:18 AM

To: White, Kevin C. <KEwhite@rivco.org>

Cc: jcoon0313@gmail.com

Subject: Comments for Athos Renewable Energy Project in Desert Center

Kevin White

Riverside County Planning Department

4080 Lemon St., 12 Floor

Riverside, CA. 92501

Dear Mr. White,

Following are my concerns and comments regarding the proposed Athos Renewable Energy Project in Desert Center. First, I'd like to state, that I've spent all of my adult years, 42 to be exact, in Desert Center. I own, along with my husband 305 acres here. We were previously grape growers for over 30 years. Our land is located adjacent to the largest proposed solar field. I would like these comments to be addressed and be part of the public record. They are in no particular order of concern.

1. Bird deaths due to crashing into panels. These solar fields look like lakes during certain times of the day. I'm not sure how you would go about mitigating this. Is there any way to lessen the destruction?

2. Displaced animals and animal deaths, loss of habitat, and loss of migration and corridor patterns. Fencing with large enough openings can be used to allow small rodents, snakes and lizards to travel mostly without impediment.

3. Water usage and drop in our water table. How will this be addressed regarding effects on local population? Do you plan on any compensation if we need to lower our pumps due to your usage? Many residents here maintain their own wells and pumps.

4. Water diversion and flash flooding. How do you plan on addressing this issue so your project doesn't cause local residents to get flooded out.

This is very important. Do you plan on providing and maintaining berms? Your project will probably divert water in new directions possibly causing additional flooding.

5. Noise pollution. We are very concerned about the substation that appears to be right next to us. Is it possible to site it further to the west, possibly to the west of your Gen-Tie / project access road? There are no neighbors to the west of us. My husband and I are the only one's living next to this proposed solar parcel. We also have on our property a WHIP wildlife pond very near to this proposed substation.

6. Transmission lines, substations, ect., would these have a negative effect on those who have a pacemaker? If so, what can be done to prevent or lessen potential problems?

7. Light pollution is a quality of life and aesthetics issue. Many residents and visitors to this area love our dark moonless nights in which to view the many stars, planets and the milky way. Please don't light it up like a car lot at night. No lights or very few lights at night would mitigate this.

8. Dust generation, especially during construction. How will you prevent or lessen the effects to our health? Asthma and respiratory issues seem to be on the rise. Are you planning on watering roads and construction areas?

9. Heat generation and reflection issues. How do you intend to mitigate or lessen the impacts?

10. Road access and maintenance. The road currently being used by those doing the environmental studies, is the same road we use to get to and from our property. We want to make certain this remains accessible to us and remains passable. We have lived on this particular road since 1980.

Will you exclusively use the Project Access Road when it is completed? If not, do you intend to maintain the current road?

A statement in the notice from the Planning Department dated 5/9/18 has us concerned by stating “the applicant is also seeking to vacate interior roadways and merge contiguous project parcels”. There are other land owners near this project who depend on access to their property.

11. Trash generation by workers and construction in general. Please entail that your employees do not trash the roadways and desert in general. This is an easy issue to mitigate.

12. Quality of life and aesthetics is very important, as that is why we live here. That will change but by addressing these issues and concerns in good faith you can help lessen the impacts that this will have on all of us and be a good neighbor.

Sincerely,

Johnney Coon
Timothy Anderson
P.O. Box 436
Desert Center, CA. 92239
760-485-6807
jcoon0313@gmail.com
Confidentiality Disclaimer

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure.

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County of Riverside California <<http://www.countyofriverside.us/>>

From: Sharon L. Davis
To: marisa@intersectpower.com; [Hedy Koczwara](#)
Subject: Athos Solar Project - Desert Center CA
Date: Monday, June 11, 2018 6:09:21 PM
Attachments: [Plat Survey.pdf](#)

From: Sharon L. Davis <sldavis63379@charter.net>
Sent: Monday, June 11, 2018 4:53 PM
To: Marisa Mitchell, Hedy Koczwara
Subject: Athos Solar Project - Desert Center CA

Dear Marisa Mitchell and Hedy Koczwara,

My name is Sharon L. Davis and I am the Trustee for Mary E. Zeiler, owner of Green Acres Mobile Park 25950 Rice Road in Desert Center CA 92239.

My brother Richard W. Zeiler and I attended the scoping session meeting on June 4, 2018 coordinated by the Riverside Planning Department regarding the Athos Solar Project; this project has a direct impact on our property as our east property line borders the solar project.

Green Acres is a 9.4 acre mobile park with approximately 4.4 acres developed with 27 mobile home/RV spaces with cement pads. There are seven (7) park-owned mobiles furnished with stove, refrigerator, central heating and cooling. Each of the 27 spaces has septic and water hook-up and individual electric meters. The remaining 5.0 acres (front footage) is undeveloped but graded and flat.

Green Acres has:

- 400 ft well
- Water tank
- street lights
- (5) septic tanks
- propane tanks on park owned mobile home spaces
- 30'x30' storage/utility garage
- 10'x20' shed and several other storage sheds
- Direct access to Rice Road (Highway 177)

Marisa, as I mentioned to you after the meeting, I feel our property would be an ideal asset as the project staging site as we have all the necessary amenities. For your convenience I have attached a Plat Plan of Green Acres Mobil Home park.

I look forward to speaking with you soon and perhaps arranging a site visit.

Sharon L. Davis
Cell: (314) 401-2738

From: Mark Hedberg [<mailto:hedberginc@icloud.com>]
Sent: Tuesday, July 17, 2018 10:46 PM
To: White, Kevin C. <KEwhite@rivco.org>
Cc: Hedberg Construction, Inc. <hedberginc@icloud.com>; Home Hedberg <katrinahedberg@me.com>
Subject: Athos Renewable Energy Project

Hi Kevin,

My name is Mark Hedberg my wife and I own a 40 acre parcel of vacant land directly adjacent to a section of the solar project, parcel #811180007-2. First off I would like to say that we are supporters of clean renewable energy and in fact have solar panels on our personal home. We do have a few concerns that we would like to have addressed regarding the projects possible post completion impact to our property.

Our family has a rich date tree farming history in the Coachella Valley which goes back about 100 years and still continues today. We purchased this 40 acre parcel based on the fact that it was zoned agricultural with plans to carry on and continue the date tree business in an area where we would not need to worry about being forced out by development as we have experienced in the Coachella Valley, unfortunately it looks as though we might be facing this same problem now. Our first concern is that if and when the project is completed the current zoning will be changed for properties surrounding this project, changes which may include limits to the height and set backs from property lines of items such as date trees (which can grow upwards of 60'-80' tall) which create a considerable amount of shade as this would block sunlight from reaching the solar ray at certain times of the day and as a result effect the energy production. Our second concern is what negative impacts the solar panels pose on agricultur such as heat or reflective issues which might damage trees. Our third concern is that we will no longer have access to our property.

Something else we are curious about and you might not be able to answer is how the project area layout and boundaries were determined. The proposed project area runs along our North and West property lines, is there a reason why our parcel was not considered to be included in this project?

I hope this email does not reach you to late and these concerns will hopefully be able to be addressed.

Respectfully,
Mark & Katrina Hedberg
73-535 Silver Moon Trail
Palm Desert, CA 92260
Cell phone, (760) 601-5404