



Jim Minnick
DIRECTOR

Imperial County Planning & Development Services Planning / Building

TO: Commissioner Mike Goodsell
Commissioner Jenell Guerrero
Commissioner Dennis Logue
Commissioner Sylvia Chavez
Commissioner Jerry Arguelles

FROM: Jim Minnick, Secretary
Planning & Development Services Director

SUBJECT: Public Hearing for the consideration of the Orni 30 LLC, Brawley Solar Energy project to determine Consistency with the Airport Land Use Compatibility Plan (ALUCP) [David Black, Project Planner] (ALUC 02-22)

DATE OF REPORT: May 18, 2022

AGENDA ITEM NO: 1

HEARING DATE: May 18, 2022

HEARING TIME: 6:00 p.m.

HEARING LOCATION: County Administration Center
Board of Supervisors Chambers
940 Main Street
El Centro, CA 92243

STAFF RECOMMENDATION

It is Staff's recommendation that the Airport Land Use Commission finds the proposed General Plan Amendment GPA #21-0003, Zone Change ZC #21-0003 and Conditional Use Permit CUP #20-0030, for the Brawley Solar Generation and Storage Project, to be consistent with the 1996 Airport Land Use Compatibility Plan.

SECRETARY'S REPORT

Project Location:

The proposed project would be located on 227 acres of private and Imperial County-owned land located approximately 1 mile north of the City of Brawley and across the city's water plant, within Township 13 S, and Range 14 E, Assessor's Parcel Numbers APN: 037-140-006, 020, 021, 022 and 023, San Bernardino Base and Meridian (SBB&M).

Project Description:

The project applicant, ORNI 30, LLC, proposes to construct and operate a 40-megawatt (MW) photovoltaic (PV) solar facility with an integrated 40 MW battery energy storage system (BESS) (not to exceed 80 MW) on five parcels 037-140-006, -020, -021, -022 and -023 totaling approximately 227 acres of privately owned land. Power would be transferred via a 1.8-mile-long double circuit 13.8 and 92 kV gen-tie line with 66-foot-high poles to interconnect to the Imperial Irrigation District's existing North Brawley Geothermal Power Plant substation, located at Hovley Road and Andre Road, southwest of the project site. A proposed fiberoptic line from the project substation would be connected with the existing North Brawley Geothermal Power Plant substation to connect the project substation to the region's telecommunications system. The proposed fiber optic telecommunications cable, once past the point of interconnection, would utilize existing transmission lines to connect to the existing North Brawley Geothermal Power Plant substation. Alternatively, a 40 to 100-foot tall microwave tower could replace the need for a fiberoptic line to transmit data offsite. The entire project site is currently zoned General Agricultural. Pursuant to Title 9, Division 5, Chapter 8, "Non-Residential structures and commercial communication towers shall not exceed one hundred twenty (120) feet in height..." The proposed transmission poles and microwave tower do not exceed the height limit of 120 feet; therefore, a Variance is not required for the proposed project.

The applicant is requesting a General Plan Amendment to include/classify three (3) of the project parcels (Assessor Parcel Nos. [APN] 037-140-022, 037-140-023 and 037-140-006 into the Renewable Energy Overlay Zone. No change in the underlying General Plan land use (Agriculture) is proposed. The entire project site is currently zoned General Agricultural. The applicant is requesting a Zone Change to include/classify all five project parcels into the Renewable Energy/Geothermal (RE-G) Overlay Zone (A-2-RE-G). Implementation of the project would also require the approval of a conditional use permit by the County to allow for the construction and operation of the proposed solar energy facility with a BESS on land zoned General Agricultural with a RE-G Overlay Zone (A-2-RE-G). Additionally, the project would require the approval of a water supply assessment by the County. The project site is approximately one mile north from the City of Brawley's jurisdictional limit. (Supervisory District #4)

The project is being presented for the Imperial County Airport Land Use Commission (ALUC)'s review and their determination of consistency with its 1996 Compatibility Plan.

General Plan/ALUCP Analysis:

The project is subject to the Airport Land Use Commission's review to determine their consistency with the 1996 ALUC Plan and policies as stated below.

ALUC Plan Part 1, Chapter 2, Policies, Section 3.2. (a) & (b) "Statutory Requirements Review" by the Commission, which shall include:

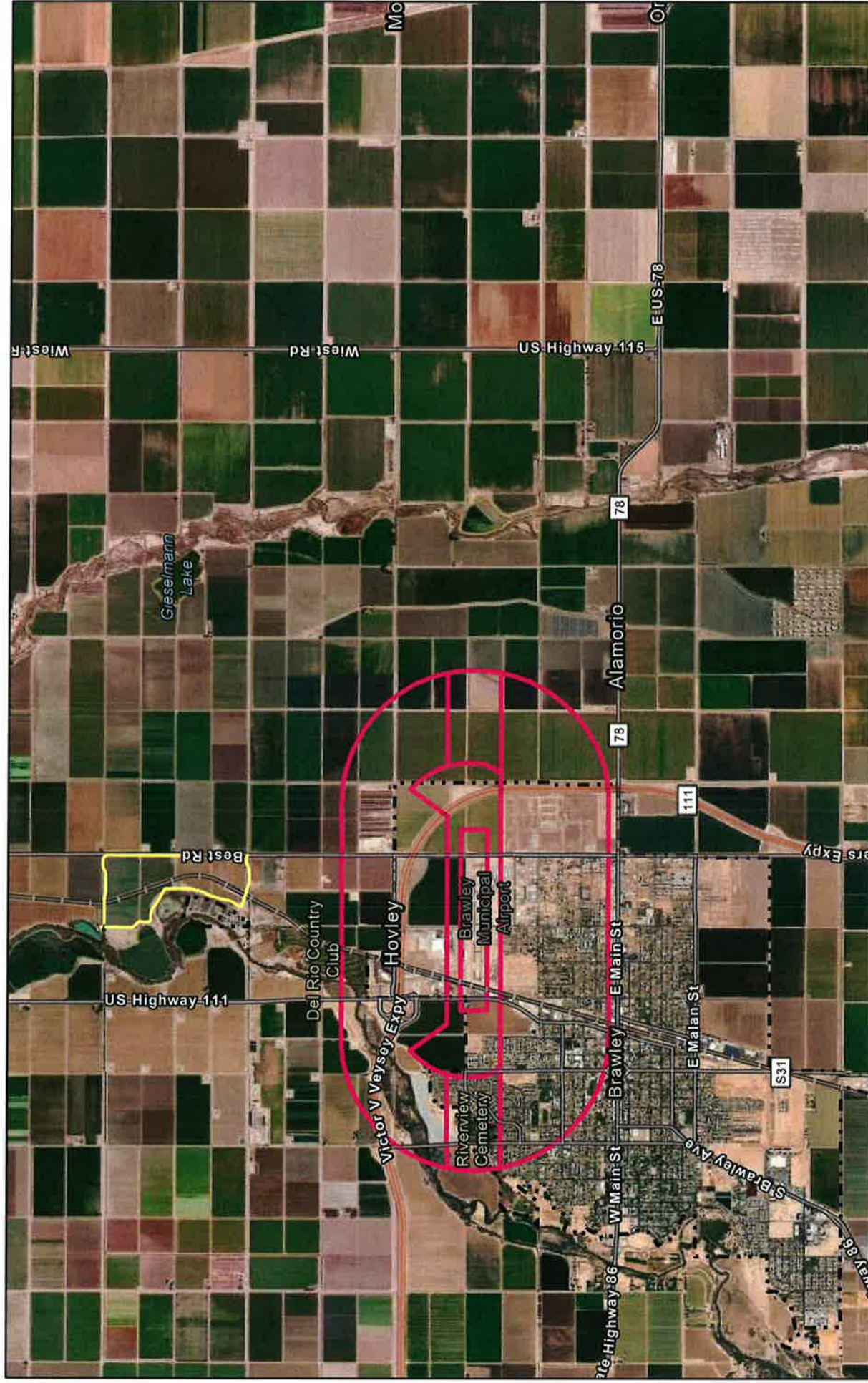
a) The adoption or approval of any amendment to a general plan or specific plan affecting the Commission's geographic area of concern as indicated in Paragraph 1 (Section 21676 (b)).

b) The adoption or approval of a zoning ordinance or building regulation which (1) affects the Commission's geographic area of concern as indicated in Paragraph 1 and (2) involves the types of airport impacts concerns listed in Paragraph 2 (Section 21676 (b)).

It is staff's recommendation that the proposed project (GPA 21-0003, ZC 21-0003 & CUP 20-0030), be considered consistent with the Airport Land Use Compatibility Plan (ALUCP).

Attachment A.
SITE PLAN

BRAWLEY SOLAR



3/25/2022, 1:33:14 PM

 ALUC Compatibility Zones

 City Limits

1:72,224



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, Sources: Esri,

Project site in Yellow

Earthstar Geographics | California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA | ArcGIS Web AppBuilder

Attachment B.
ALUC POLICIES

Policies

1. SCOPE OF REVIEW

1. Geographic Area of Concern

The Imperial County Airport Land Use Commission's planning area encompasses:

1. *Airport Vicinity* - All lands on which the uses could be negatively affected by present or future aircraft operations at the following airports in the County and lands on which the uses could negatively affect said airports. The specific limits of the planning area for each airport are depicted on the respective *Compatibility Map* for that airport as presented in Chapter 3.
 - (a) Brawley Municipal Airport.
 - (b) Calexico International Airport.
 - (c) Calipatria Municipal Airport.
 - (d) Holtville Airport.
 - (e) Imperial County Airport.
 - (f) Salton Sea Airport.
 - (g) Naval Air Facility El Centro.

2. *Countywide Impacts on Flight Safety* - Those lands, regardless of their location in the County, on which the uses could adversely affect the safety of flight in the County. The specific uses of concern are identified in Paragraph 2.
3. *New Airports and Heliports* - The site and environs of any proposed new airport or heliport anywhere in the County. The Brawley Pioneers Memorial Hospital has a heliport area on-site.

2. Types of Airport Impacts

The Commission is concerned only with the potential impacts related to aircraft noise, land use safety (with respect both to people on the ground and the occupants of aircraft), airspace protection, and aircraft over-flights. Other impacts sometimes created by airports (e.g., air pollution, automobile traffic, etc.) are beyond the scope of this plan. These impacts are within the authority of other local, state, and federal agencies and are addressed within the environmental review procedures for airport development.

3. Types of Actions Reviewed

1. *General Plan Consistency Review* - Within 180 days of adoption of the *Airport Land Use Compatibility Plan*, the Commission shall review the general plans and specific plans of affected local jurisdictions to determine their consistency with the Commission's policies. Until such time as (1) the Commission finds that the local general plan or specific plan is consistent with the *Airport Land Use Compatibility Plan*, or (2) the local agency has overruled the Commission's determination of inconsistency, the local jurisdiction shall refer all actions, regulations, and permits (as specified in Paragraph 3) involving the airport area of influence to the Commission for review (Section 21676.5 (a)).
2. *Statutory Requirements* -As required by state law, the following types of actions shall be referred to the Airport Land Use Commission for determination of consistency with the Commission's plan *prior to their approval* by the local jurisdiction:

- (a) The adoption or approval of any amendment to a general or specific plan affecting the Commission's geographic area of concern as indicated in Paragraph 1 (Section 21676 (b)).
- (b) The adoption or approval of a zoning ordinance or building regulation which (1) affects the Commission's geographic area of concern as indicated in Paragraph 1 and (2) involves the types of airport impact concerns listed in Paragraph 2 (Section 21676 (b)).
- (c) Adoption or modification of the master plan for an existing public-use airport (Section 21676 (c)).
- (d) Any proposal for a new airport or heliport whether for public use or private use (Section 21661.5).

3. *Other Project Review* - State law empowers the Commission to review additional types of land use "actions, regulations, and permits" involving a question of airport/land use compatibility if either: (1) the Commission and the local agency agree that these types of individual projects shall be reviewed by the Commission (Section 21676.5 (b)); or (2) the Commission finds that a local agency has not revised its general plan or specific plan or overruled the Commission and the Commission requires that the individual projects be submitted for review (Section 21676.5 (a)). For the purposes of this plan, the specific types of "actions, regulations, and permits" which the Commission shall review include:

- a) Any proposed expansion of a city's sphere of influence within an airport's planning area.
- b) Any proposed residential planned unit development consisting of five or more dwelling units within an airport's planning area.
- c) Any request for variance from a local agency's height limitation ordinance.
- d) Any proposal for construction or alteration of a structure (including antennas) taller than 150 feet above the ground anywhere within the County.

- e) Any major capital improvements (e.g., water, sewer, or roads) that would promote urban development.
- f) Proposed land acquisition by a government entity (especially, acquisition of a school site).
- g) Building permit applications for projects having a valuation greater than \$500,000.
- h) Any other proposed land use action, as determined by the local planning agency, involving a question of compatibility with airport activities.

4. Review Process

1. *Timing of Project Submittal* - Proposed actions listed in Paragraph 3.1 must be submitted to the Commission for review prior to approval by the local government entity. All projects shall be referred to the Commission at the earliest reasonable point in time so that the Commission's review can be duly considered by the local jurisdiction prior to formalizing its actions. At the local government's discretion, submittal of a project for Airport Land Use Commission review can be done before, after, or concurrently with review by the local planning commission or other local advisory bodies.
2. *Commission Action Choices* - When reviewing a land use project proposal, the Airport Land Use Commission has a choice of either of two actions: (1) find the project *consistent* with the *Airport Land Use Compatibility Plan*; or, (2) find the project *inconsistent* with the Plan. In making a finding of inconsistency, the Commission may note the conditions under which the project would be consistent with the Plan. The Commission cannot, however, find a project consistent with the Plan subject to the inclusion of certain conditions in the project.

Attachment C

APPLICATIONS

General Plan

Zone Change

Conditional Use Permit

**MEMO: Brawley Solar Project General Plan
Amendment**



May 25, 2021

Mr. Jim Minnick, County of Imperial
Director, Planning and Development Services
801 Main Street
El Centro, CA 92243

RE: Brawley Solar Project Application for a General Plan Amendment

Dear Mr. Jim Minnick,

ORNI 30, LLC (ORNI) is proposing to build, operate and maintain the Brawley Solar Energy Facility, a 40 Megawatt (MW) photovoltaic (PV) solar farm and 40 MW/160 Megawatt hour (MWh) battery energy storage system (BESS) in Brawley, Imperial County (Project). The Project would connect to the North Brawley Geothermal Power Plant substation southwest of the Project site via an aboveground 92 kilovolt (kV) generation tie line (gen-tie line). Energy generated and stored by the Project will be sold to the wholesale market or retail electric providers in furtherance of the goals of the California Renewable Energy Portfolio Standards and other similar renewable programs in the Pacific Southwest power market.

The Project is located at 5003 Best Ave, Brawley, California on five privately owned parcels, totaling approximately 225 total acres. The Project site encompasses Assessor's Parcel Numbers (APNs) 037-140-020, 037-140-021, 037-140-022, 037-140-023, and 037-140-006. The northern two parcels are located within the existing Geothermal Overlay Zone as shown in Figure 1. However, as the Applicant is requesting to develop a solar project, ORNI would like to request your consideration of a General Plan Amendment for the Project to include all five parcels within the Renewable Energy Overlay Zone as shown in Figure 2. No change in the underlying general plan land designation "Agriculture" is proposed.

Please let us know if you have any questions or concerns regarding this memo.

Sincerely,

CHAMBERS GROUP, INC.

A handwritten signature in blue ink that reads "Victoria Boyd".

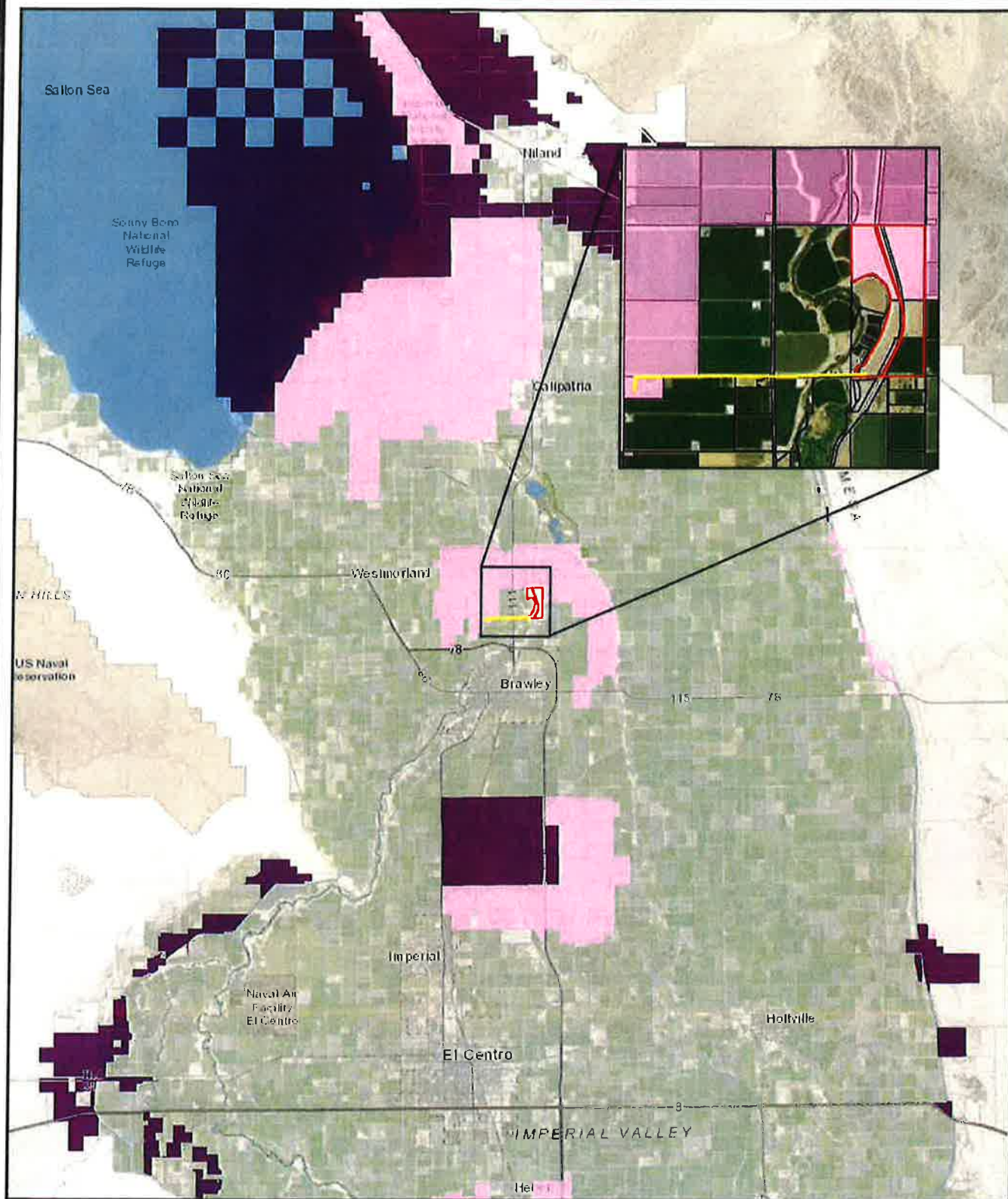
Victoria Boyd
Project Manager/Environmental Planner
vboyd@chambersgroupinc.com
(760)685-4838
9620 Chesapeake Dr Suite 202
San Diego, CA 92123

RECEIVED

MAY 28 2021

**IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES**





- Project Area
 Gen-Tie Line
- Existing Renewable Energy Overlay Zones
- Geothermal
 Renewable Energy/Geothermal

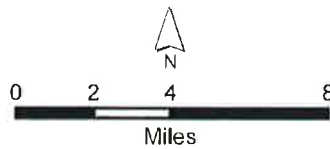


Figure 1
 Brawley Solar
 Existing Renewable Energy
 Overlay Zones

Existing Renewable Energy Overlay
Geothermal

Zoning (Imperial Co.)

Project Area — **Gen-Tie Line**

Proposed Renewable Energy Overlay Zone Area

Legend:

- Project Area (Red outline)
- Gen-Tie Line (Yellow line)
- Proposed Renewable Energy Overlay Zone Area (Blue hatched)
- Geothermal (Pink hatched)
- Zoning (Imperial Co.)
 - A-2-G (Light Green)
 - A-2-G-U (Light Green)
 - A-2-R-G (Dark Green)
 - A-3-G (Dark Green)
 - Brawley (Blue)
 - M-1-G (Red)
 - S-1-G-U (Yellow)



CHANGE OF ZONE

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black & blue) SPACES - Please type or print -

1. PROPERTY OWNER'S NAME ORNI 17 LLC; ORNI 19 LLC		EMAIL ADDRESS asanchez@ormat.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 6140 Pulmas Street, Reno, NV		ZIP CODE 89519	PHONE NUMBER 755-356-9029
3. ENGINEER'S NAME	CA. LICENSE NO.	EMAIL ADDRESS	
4. MAILING ADDRESS (Street / P O Box, City, State) 6140 Pulmas Street, Reno, NV		ZIP CODE 89519	PHONE NUMBER 755-356-9029
5. ASSESSOR'S PARCEL NO. 037-140-020, 037-140-021, 037-140-022, 037-140-023, 037-140-008	ZONING (existing) A-2-G and (-020 and -021 In Geothermal RE Overlay)	ZONING (proposed) A-2-G and RE Overlay	
6. PROPERTY (site) ADDRESS 5003 Best Ave, Brawley, California		SIZE OF PROPERTY (in acres or square foot) 223 Acres	
7. GENERAL LOCATION (i.e. city, town, cross street) Northwest of Best Ave and Ward Road intersection			
8. LEGAL DESCRIPTION 5003 Best Ave, Brawley, California Section 15, Township 13 South, Range 14 East			
8. DESCRIBE CURRENT USE ON / OF PROPERTY (list and describe in detail) Fallow alfalfa agricultural fields.			
9. PLEASE STATE REASON FOR PROPOSED USE (be specific) Construction and operation of a 40 MW solar farm and 40 MW/ 160 MWh battery storage facility. Energy generated and stored by the Project will be sold to the wholesale market or retail electric providers in furtherance of the goals of the California Renewable Energy Portfolio Standards and other similar renewable programs in the Pacific Southwest power market.			
10. DESCRIBE SURROUNDING PROPERTY USES North and east of the site is undeveloped agricultural land. South of the Project site is a mixture of undeveloped agricultural land and dirt lots used for staging activities. The City of Brawley Wastewater Treatment Plant is located along the western edge.			

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY
CERTIFY THAT THE INFORMATION SHOWN OR STATED
HEREIN IS TRUE AND CORRECT.

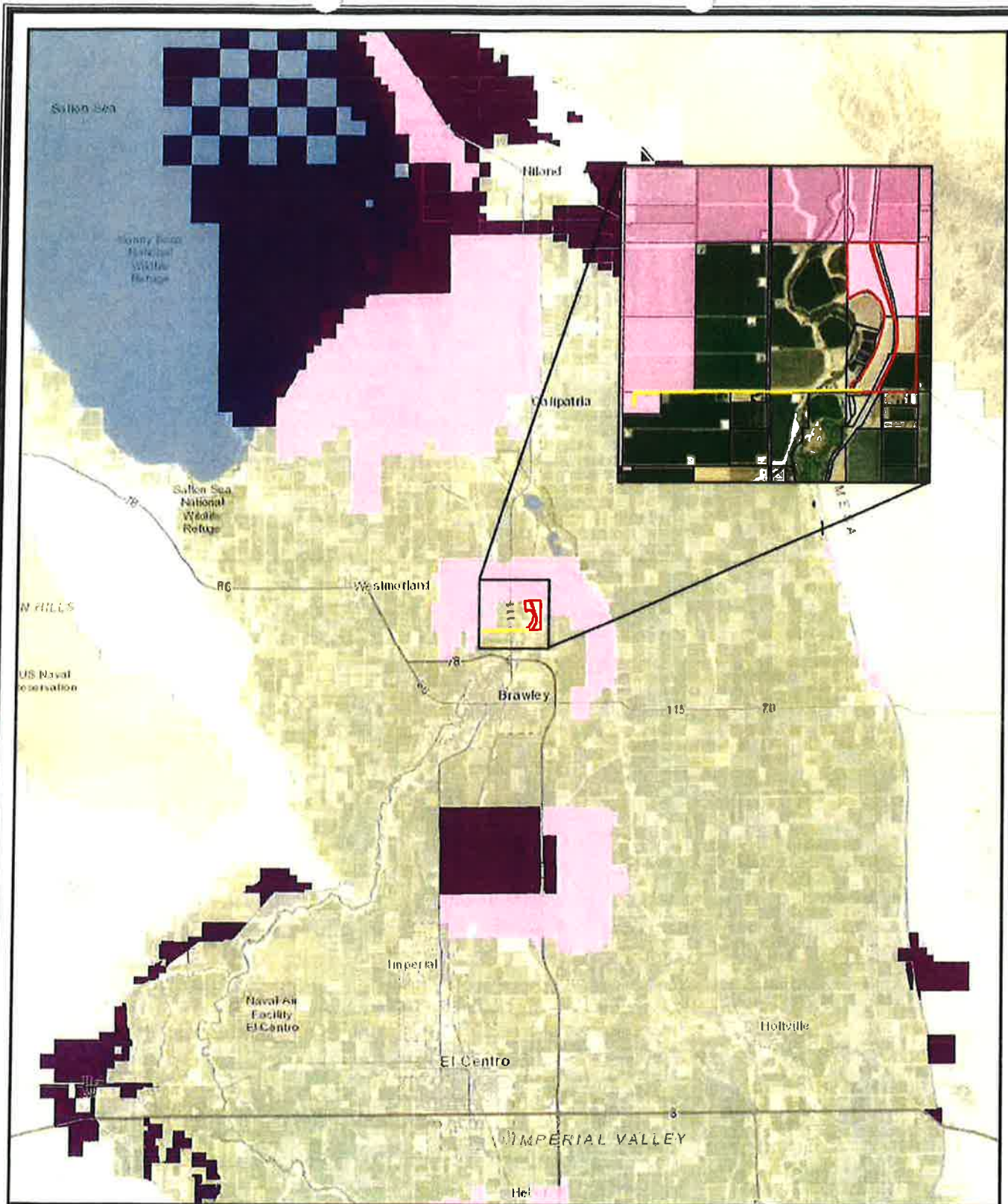
Connie Stechman 5-27-2021
Print Name Date
Connie Stechman
Signature

REQUIRED SUPPORT DOCUMENTS

- A. SITE PLAN
- B. PRELIMINARY TITLE REPORT (6 months or newer)
- C. FEE _____
- D. OTHER _____

APPLICATION RECEIVED BY: <u>DA</u>	DATE <u>6/1/21</u>	REVIEW / APPROVAL BY OTHER DEPT'S required.
APPLICATION DEEMED COMPLETE BY: _____	DATE _____	<input type="checkbox"/> P. W.
APPLICATION REJECTED BY: _____	DATE _____	<input type="checkbox"/> E. H. S.
TENTATIVE HEARING BY: _____	DATE _____	<input type="checkbox"/> A. P. C. D.
FINAL ACTION: <input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	DATE _____	<input type="checkbox"/> O. E. S.
		<input type="checkbox"/> _____

ZC #



- Project Area
 Gen-Tie Line
- Existing Renewable Energy Overlay Zones
- Geothermal
 - Renewable Energy/Geothermal

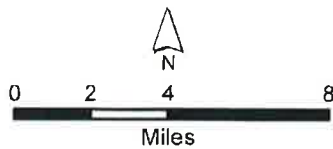


Figure 1
Brawley Solar
Existing Renewable Energy
Overlay Zones

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES - Please type or print -

1. PROPERTY OWNER'S NAME ORNI 17 LLC; ORNI 19 LLC		EMAIL ADDRESS mwendt@ormat.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 6140 Pulmas Street, Reno, NV		ZIP CODE 89519	PHONE NUMBER 755-356-9029
3. APPLICANT'S NAME ORNI 30 LLC		EMAIL ADDRESS mwendt@ormat.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 6140 Pulmas Street, Reno, NV		ZIP CODE 89519	PHONE NUMBER 755-356-9029
4. ENGINEER'S NAME		CA. LICENSE NO.	EMAIL ADDRESS
5. MAILING ADDRESS (Street / P O Box, City, State) 6140 Pulmas Street, Reno, NV		ZIP CODE 89519	PHONE NUMBER 755-356-9029
6. ASSESSOR'S PARCEL NO. 037-140-020, 037-140-021, 037-140-022, 037-140-023, 037-140-006		SIZE OF PROPERTY (in acres or square foot) 223 acres	ZONING (existing) A-2-G
7. PROPERTY (site) ADDRESS 5003 Best Ave, Brawley, California			
8. GENERAL LOCATION (i.e. city, town, cross street) Northwest of the Best Ave and Ward Road intersection			
9. LEGAL DESCRIPTION 5003 Best Ave, Brawley, California Section 15, Township 13 South, Range 14 East			

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail) Construction and operation of a 40 MW solar farm and 40 MW / 160 MWh battery storage facility. See attached CUP application for details.	
11. DESCRIBE CURRENT USE OF PROPERTY	Agriculture
12. DESCRIBE PROPOSED SEWER SYSTEM	No additional sewer service proposed
13. DESCRIBE PROPOSED WATER SYSTEM	No additional water service proposed
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	Built-in fire protection system
15. IS PROPOSED USE A BUSINESS? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? No full-time site personnel; periodic security, maintenance, and system monitoring visits

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY
CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN
IS TRUE AND CORRECT.

Connie Flechman
Print Name
Connie Flechman
Signature

12-11-2020
Date

Print Name

Date

Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN	_____
B. FEE	_____
C. OTHER	_____
D. OTHER	_____

APPLICATION RECEIVED BY:

JDR

DATE

12/28/20

REVIEW / APPROVAL BY
OTHER DEPT'S required.

APPLICATION DEEMED COMPLETE BY:

DATE

☐ P. W.

LOCATION REJECTED BY:

DATE

☐ E. H. S.

ACTIVE HEARING BY:

DATE

☐ A. P. C. D.

ACTION:

☐

APPROVED

☐

DENIED

DATE

☐ O. E. S.

☐

☐

CUP #

20-0030

IS 20-0041

Letter of Transmittal

CHAMBERS GROUP

December 21, 2020

Mr. Jim Minnick, County of Imperial
Director, Planning and Development Services
801 Main Street
El Centro, CA 92243

RE: Brawley Solar Project Application for a Conditional Use Permit

Dear Mr. Jim Minnick,

ORNI 30, LLC (ORNI) is proposing to build, operate and maintain the Brawley Solar Energy Facility, a 40 Megawatt (MW) photovoltaic (PV) solar farm and 40 MW/160 Megawatt hour (MWh) battery energy storage system (BESS) on approximately 225 acres in Brawley, Imperial County (Project). The Project would connect to the North Brawley Geothermal Power Plant substation southwest of the Project site via an approximately 1.6-mile-long aboveground 92 kilovolt (kV) generation tie line (gen-tie line). Energy generated and stored by the Project will be sold to the wholesale market or retail electric providers in furtherance of the goals of the California Renewable Energy Portfolio Standards and other similar renewable programs in the Pacific Southwest power market.

Enclosed is one original CUP application with ink signatures, two hard copies of the CUP application, and one CD copy of the CUP application. The enclosed application includes the following items:

- CUP Application Form
- Site Plan (20 copies)
- Imperial County Planning & Development Services (ICPDS) General Indemnification Agreement
- CUP Application Fee (check for \$11,000)
- Owner's Affidavits for parcels: 037-140-006, 037-140-020, 037-140-021, 037-140-022, and 037-140-023
- CUP Application Package, including:
 - Appendix A - Project Description

In addition to submitting an application for a Conditional Use Permit, ORNI would like to request a pre-application meeting with the County in order to discuss project details and confirm the technical studies that the County will expect to be required as part of the County's review.

Sincerely,

CHAMBERS GROUP, INC.

Corinne Lytle-Bonine
Vice President
clittle-bonine@chambersgroupinc.com
(858) 541-2800
9620 Chesapeake Dr Suite 202
San Diego, CA 92123

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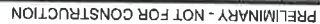
DEC 28 2020

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES



www.chambersgroupinc.com





the PV arrays would include installation of mounting posts, module rail assemblies, PV modules, inverters, transformers and buried electrical conductors. Concrete would be required for the footings, foundations and pads for the transformers and substation work. Tracker foundations would be comprised of either driven or vibrated steel posts/pipes, and/or concrete in some places (depending on soil and underground conditions).

All access to the Project site would be located off Best Avenue. Access roads would be constructed with an all-weather surface, to meet the County Fire Department's standards, and lead to a locked gate that can be opened by any emergency responders. An all-weather surface access road, to meet the County's standards, would surround the perimeter of the Project site, as well as around solar blocks no greater than 500 by 500 feet. The Project would be required to conform to all California Public Utilities Commission (CPUC) safety standards. The Project site perimeter would be fenced with a 6-foot high chain link security fence topped with barbed wire, with gates at the access points.

1.3.1 Gen-Tie Line

The Project would connect to a switchyard located in the southwest corner Project site and then routed through the BESS building for energy storage. Power would then be transferred to the North Brawley Geothermal Power Plant substation via a 1.6-mile-long double circuit 13.8 and 92 kV gen-tie line with 66-foot-high poles to interconnect to the Imperial Irrigation District (IID) at the North Brawley 1 substation located at Hovley Road and Andre Road, southwest of the Project site. The transmission line would span the New River. A 12-inch diameter conduit railroad undercrossing would connect the PV arrays from the western side of the railroad tracks to the inverters on the eastern side.

1.3.2 BESS Building

The Project's BESS component will be housed in a 100,800 square-foot BESS building at the southwestern corner of the Project site. The BESS building will consist of 12 banks of racks, each having 40 rack units capable of 372.7 kWh. Each bank of batteries will be supported by an inverter and transformer located on the outside of the building, along the edges. To support liquid cooling of the system, up to two 200-ton air cooled screw chillers may be needed adjacent to the building. All batteries will be lithium-ion based capable of storing 40 MW/160 MWh.

1.3.3 Fiberoptic Cable and Microwave Tower

A proposed fiberoptic line from the Project substation would be connected with the existing North Brawley substation approximately 1.6 miles to the southwest, which is required to connect the Project substation to the region's telecommunications system. Overall, this would provide Supervisory Control and Data Acquisition (SCADA), protective relaying, data transmission, and telephone services for the proposed Project substation and associated facilities. New telecommunications equipment would be installed at the Project substation within the unmanned Mechanical and Electrical Equipment Room (MEER). The proposed fiber optic telecommunications cable, once past the POI, would utilize existing transmission lines to connect to the North Brawley substation. The length of this proposed fiber optic telecommunications cable route would be approximately 1.6 miles. Alternatively, a microwave tower 40 to 100-feet tall could replace the need for a fiberoptic line to transmit data offsite. If selected, this microwave tower would be located within the Project substation footprint.

Equipment	Use
Air compressor	Operate air tools
Air tampers	Compact soil around structure foundations
Concrete trucks	Pour concrete
Dump trucks	Haul excavated materials/import backfill
Fuel and equipment fluid trucks	Refuel and maintain vehicles
Water trucks	Suppress dust and fires

1.4.2 Construction Schedule, Sequence and Phasing

Construction is anticipated to start in quarter four of 2021 and would take approximately 6-9 months to complete. Construction would commence only after all required permits and authorizations have been secured. Construction would generally occur during daylight hours, Monday through Friday. However, non-daylight work hours may be necessary to make up schedule deficiencies, or to complete critical construction activities. For example, during hot weather, it may be necessary to start work earlier to avoid pouring concrete during high ambient temperatures. If construction is to occur outside of the County's specified working hours, permission in writing will be sought at the time. The County's construction equipment operation shall be limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. Saturday. No commercial construction operations are permitted on Sunday or holidays.

Construction of the Project would occur in phases beginning with site preparation and grading and ending with equipment setup and commencement of commercial operations. Overall, construction would consist of three major phases over a period of approximately 6-9 months:

1. Site Preparation, which includes clearing grubbing, grading, service roads, fences, drainage, and concrete pads; (1 month)
2. PV system installation and testing, which includes installation of mounting posts, assembling the structural components, mounting the PV modules, wiring; (7 months) and
3. Site clean-up and restoration. (1 month)

1.4.2.1 Site Preparation

Project construction would include the renovation of existing dirt roads to all-weather surfaces (to meet the County standards) from Best Avenue to the City of Brawley wastewater treatment plant. Construction of the proposed Project would begin with clearing of existing brush and installation of fencing around the Project boundary.

Fencing will consist of a six-foot chain-link fence topped with barbed wire. A 20-foot road of engineering-approved aggregate will surround the site within the fencing. Approximately 20,000 to 30,000 gallons of water per day would initially be required for grading, dropping to much less for the remainder of the Project construction. Construction water needs would be limited to earthwork, soil conditioning, dust suppression, and compaction efforts. Water would be obtained from a ground storage tank existing onsite which fills from the Best Canal along the eastern property boundary. Material and equipment staging areas would be established on-site within an approximate 4-acre area. The staging area would include an air-conditioned temporary construction office, a first-aid station and other temporary facilities including, but not limited to, sanitary facilities, worker parking, truck loading and unloading, and a designated area

1.4.2.3 Clean-up and Demobilization

After construction is complete, all existing roads would be left in a condition equal to or better than their preconstruction condition. All other areas disturbed by construction activities would be recontoured and decompacted.

Waste materials and debris from construction areas would be collected, hauled away, and disposed of at approved landfill sites. Cleared vegetation would be shredded and distributed over the disturbed site as mulch and erosion control or disposed of offsite, depending on agency agreements. Rocks removed during foundation excavation would be redistributed over the disturbed site to resemble adjacent site conditions. Interim reclamation would include also re-contouring of impacted areas to match the surrounding terrain, and cleaning trash out of gullies. Equipment used could include a blader, front-end loader, tractor, and a dozer with a ripper.

A covered portable dumpster would be kept on site to contain any trash that can be blown away. After completion of the proposed Project, the project engineer would complete a final walk-through and note any waste material left on site and any ruts or terrain damage or vegetation disturbance that has not been repaired. The construction contractor would be given this list and final payment would not be received until all items are completed.

1.5 PROJECT OPERATION AND MAINTENANCE ACTIVITIES

Once fully constructed, the Project would be operated on an unstaffed basis and be monitored remotely from the Brawley Geothermal Power Plant control room, with periodic on-site personnel visitations for security, maintenance and system monitoring. Therefore, no full-time site personnel would be required on-site during operations and employees would only be on-site up to four times per year to wash the panels. As the Project's PV arrays produce electricity passively, maintenance requirements are anticipated to be very minimal. Any required planned maintenance activities would generally consist of equipment inspection and replacement and would be scheduled to avoid peak load periods. Any unplanned maintenance would be responded to as needed, depending on the event.

Estimated annual water consumption for operation and maintenance of the proposed Project, including periodic PV module washing, would be approximately 0.81-acre feet annually (af/y), which would be trucked to the Project site as needed.

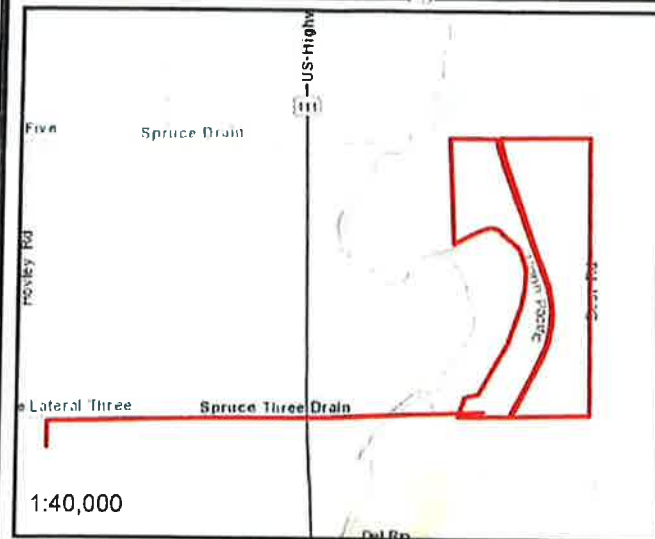
1.6 PROJECT DECOMMISSIONING

Solar equipment has a lifespan of approximately 20 to 25 years. At the end of the Project's operation term, the applicant may determine that the Project should be decommissioned and deconstructed. Should the Project be decommissioned, concrete footings, foundations, and pads would be removed using heavy equipment and recycled at an off-site location. All remaining components would be removed, and all disturbed areas would be reclaimed and recontoured.

1.7 REQUIRED PERMITS AND APPROVALS

1.7.1 Lead Agency Approval

Imperial County Planning Department would be the lead agency for the proposed Project.



- Project Location
- Gen-Tie Line

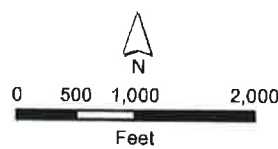


Figure 1
Brawley Solar Project
Project Location & Vicinity

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Assessment Information

Taxroll Values

Assessment No.	037-140-006-000	 camera No Images	Land	981791	
Parcel Number	037-140-006-000		Structure	11770	
Asmt Desc	POR S2 OF W2 TR 120 13-14 32.75AC E OF SPRR			Fixtures	0
Status	A	Date		Growing	0
Taxability	000	TRA	056000	Total L&I	993561
Supl Cnt.	1	Base Date	1/1/2000	Flx R/P	0
Zoning		Dwelling	0	MM PP	0
Acres	32.75	N/C	037	PP	
Flags				Hox Exmpt.	0
Ag Preserve	N	EtAl	N	Other Exmpt.	0
Notes	Y	Bonds	Y	Net	993561
Multiple Situses		Flag1	N	RC No.	
Flag2	N	Asmt PP Pen		T/R Date	
Tax PP Pen		Appeal Pend	N	R/C Status	
Split Pend	N				
Address	2800 POST OAK BOULEVARD				
	HOUSTON TX 77056				

Situs

5003 BEST El Centro CA 92243

Document	Number	Date
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Terminating		
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