



DEPARTMENT OF PUBLIC WORKS AND PLANNING
STEVEN E. WHITE, DIRECTOR

**NOTICE OF INTENT TO ADOPT A
MITIGATED NEGATIVE DECLARATION**

FILED

SEP 20 2018

TIME
12:11 AM

FRESNO COUNTY CLERK

By

[Signature]

DEPUTY

For County Clerk's Stamp

Notice is hereby given that the County of Fresno has prepared Initial Study Application (IS) No. 7441 pursuant to the requirements of the California Environmental Quality Act for the following proposed project:

INITIAL STUDY APPLICATION NO. 7441 and UNCLASSIFIED CONDITIONAL USE PERMIT APPLICATION NO. 3609 filed by **FOREFRONT POWER** proposing to allow a 5 MWac solar photovoltaic power generation facility on a 39-acre portion of a 79.7-acre parcel in the AL-20 (Limited Agricultural, 20-acre minimum parcel size) Zone District. The project is located on West Jayne Avenue, 1.2 miles east of its intersection with State Route 33, and northerly adjacent to the nearest city limits of the City of Coalinga (SUP. DIST. 4) (APN 073-060-12). Adopt the Mitigated Negative Declaration prepared for Initial Study Application No. 7441, and take action on Unclassified Conditional Use Permit Application No. 3609 with Findings and Conditions.

(hereafter, the "Proposed Project")

The County of Fresno has determined that it is appropriate to adopt a Mitigated Negative Declaration for the Proposed Project. The purpose of this Notice is to (1) provide notice of the availability of IS Application No. 7441 and the draft Mitigated Negative Declaration, and request written comments thereon; and (2) provide notice of the public hearing regarding the Proposed Project.

Public Comment Period

The County of Fresno will receive written comments on the Proposed Project and Mitigated Negative Declaration from September 24, 2018 through October 24, 2018

Email written comments to dacrider@co.fresno.ca.us, or mail comments to:

Fresno County Department of Public Works and Planning
Development Services and Capital Projects Division
Attn: Danielle Crider
2220 Tulare Street, Suite A
Fresno, CA 93721

IS Application No. 7441 and the draft Mitigated Negative Declaration may be viewed at the above address Monday through Thursday, 9:00 a.m. to 5:00 p.m., and Friday, 8:30 a.m. to 12:30 p.m. (except holidays), or at <http://www.co.fresno.ca.us/initialstudies>. An electronic copy

of the draft Mitigated Negative Declaration for the Proposed Project may be obtained from Danielle Crider at the addresses above.

Public Hearing

The Planning Commission will hold a public hearing to consider approving the Proposed Project and the Mitigated Negative Declaration on October 25, 2018, at 8:45 a.m., or as soon thereafter as possible, in Room 301, Hall of Records, 2281 Tulare Street, Fresno, California 93721. Interested persons are invited to appear at the hearing and comment on the Proposed Project and draft Mitigated Negative Declaration.

For questions please call Danielle Crider at (559) 600-9669.

Published: September 24, 2018



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
STEVEN E. WHITE, DIRECTOR

DRAFT NOTICE OF DETERMINATION

To: Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

County Clerk, County of Fresno
2221 Kern Street
Fresno, CA 93721

From: Fresno County Department of Public Works and Planning, Development Services and Capital Projects Division
2220 Tulare Street (corner of Tulare and "M") Suite "A", Fresno, CA 93721

Subject: Filing of Notice of Determination in compliance with Section 21152 of the Public Resource Code

Project: Initial Study Application No. 7441 and Classified Conditional Use Permit Application No. 3609

Location: The project is located on West Jayne Avenue, 1.2 miles east of its intersection with State Route 33, and northerly adjacent to the nearest city limits of the City of Coalinga. (SUP. DIST. 4) (APN 073-060-12).

Description: Allow a 5 MWac solar photovoltaic power generation facility on a 39-acre portion of a 79.7-acre parcel in the AL-20 (Limited Agricultural, 20-acre minimum parcel size) Zone District.

This is to advise that the County of Fresno (Lead Agency Responsible Agency) has approved the above described project on October 25, 2018, and has made the following determination:

1. The project **will** **will not** have a significant effect on the environment.
2. An Environmental Impact Report (EIR) **was not** prepared for this project pursuant to the provisions of CEQA. / A Mitigated Negative Declaration **was not** prepared for this project pursuant to the provisions of CEQA.
3. Mitigation Measures **were** **were not** made a condition of approval for the project.
4. A statement of Overriding Consideration **was** **was not** adopted for this project.

This is to certify that the Initial Study with comments and responses and record of project approval is available to the General Public at Fresno County Department of Public Works and Planning, 2220 Tulare Street, Suite A, Corner of Tulare and "M" Streets, Fresno, California.

Danielle Crider, Planner
(559) 600-9669 / dacrider@co.fresno.ca.us

Date

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DEVELOPMENT SERVICES AND CAPITAL PROJECTS DIVISION
2220 Tulare Street, Sixth Floor / Fresno, California 93721 / Phone (559) 600-4497 / 600-4022 / 600-4540 / FAX 600-4200
The County of Fresno is an Equal Employment Opportunity Employer

File original and one copy with: Fresno County Clerk 2221 Kern Street Fresno, California 93721		Space Below For County Clerk Only. CLK-2046.00 E04-73 R00-00	
Agency File No: IS 7441	LOCAL AGENCY PROPOSED MITIGATED NEGATIVE DECLARATION		County Clerk File No: E-
Responsible Agency (Name): Fresno County	Address (Street and P.O. Box): 2220 Tulare St. Sixth Floor	City: Fresno	Zip Code: 93721
Agency Contact Person (Name and Title): Danielle Crider, Planner	Area Code: 559	Telephone Number: 600-9669	Extension: N/A
Applicant (Name): Forefront Power	Project Title: CUP 3609		
Project Description: Allow a 5 MWac solar photovoltaic power generation facility on a 39-acre portion of a 79.7-acre parcel in the AL-20 (Limited Agricultural, 20-acre minimum parcel size) Zone District. This project is located on West Jayne Avenue, 1.2 miles east of its intersection with State Route 33, and northerly adjacent to the nearest city limits of the City of Coalinga. (SUP. DIST. 4) (APN 073-060-12).			
Justification for Negative Declaration: Based upon the Initial Study prepared for Unclassified Conditional Use Permit Application No. 3609, staff has concluded that the project will not have a significant effect on the environment. It has been determined that there will be no impacts to Population and Housing, Public Services, and Recreation. Potential impacts related to Agricultural and Forestry Resources, Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use Planning, Mineral Resources, Noise, Transportation and Traffic, and Utilities and Service Systems have been determined to be less than significant. Potential impacts relating to Aesthetics, Biological Resources, Cultural Resources, and Hydrology and Water Quality have been determined to be less than significant with compliance with the mitigation measures. A Mitigated Negative Declaration is recommended and is subject to approval by the decision-making body. The Initial Study is available for review at 2220 Tulare Street, Suite A, Street Level, located on the southwest corner of Tulare and "M" Street, Fresno, California.			
FINDING: The proposed project will not have a significant impact on the environment.			
Newspaper and Date of Publication: Fresno Business Journal – September 24, 2018		Review Date Deadline: Planning Commission – October 25, 2018	
Date: TBD	Type or Print Signature: Danielle Crider Planner	Submitted by (Signature):	

State 15083, 15085

County Clerk File No.: _____

**LOCAL AGENCY
MITIGATED NEGATIVE DECLARATION**



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
STEVEN E. WHITE, DIRECTOR

INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

1. **Project title:** *Initial Study No. 7441 and Unclassified Conditional Use Permit No. 3609*
2. **Lead agency name and address:** *Fresno County Department of Public Works and Planning
Development Services and Capital Projects Division
2220 Tulare Street, Sixth Floor
Fresno, California, 93721*
3. **Contact person and phone number:** *Danielle Crider, (559) 600-9669*
4. **Project location:** *The project is located on West Jayne Avenue, 1.2 miles east of its intersection with State Route 33, and northerly adjacent to the nearest city limits of the City of Coalinga. (SUP. DIST. 4) (APN 073-060-12).*
5. **Project Applicant's name and address:** *Forefront Power (Peter Rodriguez), 100 Montgomery Street, Suite 1400, San Francisco, CA 94104*
6. **General Plan designation:** *Agriculture*
7. **Zoning:** *AE-20 (Exclusive Agricultural, 20-acre minimum parcel size)*
8. **Description of project:** *Allow a 5 MWac solar photovoltaic power generation facility on a 39-acre portion of a 79.7-acre parcel in the AL-20 (Limited Agricultural, 20-acre minimum parcel size) Zone District.*
9. **Surrounding land uses and setting:** *This project is located on West Jayne Avenue, 1.2 miles east of its intersection with State Route 33, and northerly adjacent to the nearest city limits of the City of Coalinga. (SUP. DIST. 4) (APN: 073-060-12).*
10. **Briefly describe the project's surroundings:** *The project is located in an agricultural area, immediately adjacent to the Pleasant Valley State Prison.*

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | |
|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Biological Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems |
| <input type="checkbox"/> Mandatory Findings of Significance | <input type="checkbox"/> Greenhouse Gas Emissions |

DETERMINATION OF REQUIRED ENVIRONMENTAL DOCUMENT:

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment. **A NEGATIVE DECLARATION WILL BE PREPARED.**
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the Mitigation Measures described on the attached sheet have been added to the project. **A MITIGATED NEGATIVE DECLARATION WILL BE PREPARED.**
- I find the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required
- I find that as a result of the proposed project, no new effects could occur, or new Mitigation Measures would be required that have not been addressed within the scope of a previous Environmental Impact Report.

PERFORMED BY:

Danielle Crider
Danielle Crider, Planner

Date: 9/20/18

REVIEWED BY:

M. Mollring
Marianne Mollring, Senior Planner

Date: 9-20-18

**INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM**
(Initial Study Application No. 7458 and
Classified Conditional Use Permit
Application No. 3613)

The following checklist is used to determine if the proposed project could potentially have a significant effect on the environment. Explanations and information regarding each question follow the checklist.

1 = No Impact

2 = Less Than Significant Impact

3 = Less Than Significant Impact with Mitigation Incorporated

4 = Potentially Significant Impact

I. AESTHETICS

Would the project:

- 1 a) Have a substantial adverse effect on a scenic vista?
- 1 b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- 2 c) Substantially degrade the existing visual character or quality of the site and its surroundings?
- 3 d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

II. AGRICULTURAL AND FORESTRY RESOURCES

Would the project:

- 2 a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- 2 b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?
- 1 c) Conflict with existing zoning for forest land, timberland or timberland zoned Timberland Production?
- 1 d) Result in the loss of forest land or conversion of forest land to non-forest use?
- 2 e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

III. AIR QUALITY

Would the project:

- 2 a) Conflict with or obstruct implementation of the applicable Air Quality Plan?
- 2 b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- 2 c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable Federal or State ambient air quality standards (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- 2 d) Expose sensitive receptors to substantial pollutant concentrations?
- 2 e) Create objectionable odors affecting a substantial number of people?

IV. BIOLOGICAL RESOURCES

Would the project:

- 3 a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- 2 b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- 2 c) Have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- 2 d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- 2 e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- 2 f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?

V. CULTURAL RESOURCES

Would the project:

- 3 a) Cause a substantial adverse change in the significance of a historical resource as defined in Public Resources Code Section 15064.5?
- 3 b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Public Resources Code Section 15064.5?
- 3 c) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?
- 3 d) Disturb any human remains, including those interred outside of formal cemeteries?
- 3 e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074?

VI. GEOLOGY AND SOILS

Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - 2 i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
 - 2 ii) Strong seismic ground shaking?
 - 2 iii) Seismic-related ground failure, including liquefaction?
 - 2 iv) Landslides?
- 2 b) Result in substantial soil erosion or loss of topsoil?
- 2 c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

- 1 d) Be located on expansive soil as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- 1 e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

- 2 e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?
- 2 f) Otherwise substantially degrade water quality?
- 1 g) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- 1 h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- 1 i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- 1 j) Cause inundation by seiche, tsunami, or mudflow?

VII. GREENHOUSE GAS EMISSIONS

Would the project:

- 2 a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- 2 b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- 2 a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 2 b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- 1 c) Create hazardous emissions or utilize hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- 2 d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- 2 e) Result in a safety hazard for people residing or working in the project area for a project located within an Airport Land Use Plan or, where such a Plan has not been adopted, within two miles of a public airport or public use airport?
- 2 f) Result in a safety hazard for people residing or working in the project area for a project within the vicinity of a private airstrip?
- 2 g) Impair implementation of or physically interfere with an adopted Emergency Response Plan or Emergency Evacuation Plan?
- 2 h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

IX. HYDROLOGY AND WATER QUALITY

Would the project:

- 2 a) Violate any water quality standards or waste discharge requirements?
- 1 b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?
- 3 c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?
- 3 d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

X. LAND USE AND PLANNING

Would the project:

- 1 a) Physically divide an established community?
- 2 b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, Specific Plan, local coastal program, or Zoning Ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- 1 c) Conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan?

XI. MINERAL RESOURCES

Would the project:

- 2 a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- 2 b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local General Plan, Specific Plan or other land use plan?

XII. NOISE

Would the project:

- 2 a) Expose persons to or generate noise levels in excess of standards established in the local General Plan or Noise Ordinance, or applicable standards of other agencies?
- 2 b) Expose persons to or generate excessive ground-borne vibration or ground-borne noise levels?
- 2 c) Create a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- 2 d) Create a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
- 2 e) Expose people residing or working in the project area to excessive noise levels, for a project located within an Airport Land Use Plan or, where such a Plan has not been adopted, within two miles of a public airport or public use airport?
- 2 f) Expose people residing or working in the project area to excessive noise levels, for a project within the vicinity of a private airstrip?

XIII. POPULATION AND HOUSING

Would the project:

- 1 a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- 1 b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

- 1 c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

XIV. PUBLIC SERVICES

Would the project:

Result in substantial adverse physical impacts associated with the provision of new or physically-altered governmental facilities, or the need for new or physically-altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- 1 a) Fire protection?
1 b) Police protection?
1 c) Schools?
1 d) Parks?
1 e) Other public facilities?

XV. RECREATION

Would the project:

- 1 a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
1 b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

XVI. TRANSPORTATION / TRAFFIC

Would the project:

- 2 a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
2 b) Conflict with an applicable Congestion Management Program including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?
2 c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, which results in substantial safety risks?
2 d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Documents Referenced:

This Initial Study references the documents listed below. These documents are available for public review at the County of Fresno, Department of Public Works and Planning, Development Services and Capital Projects Division, 2220 Tulare Street, Suite A, Fresno, California (corner of M & Tulare Streets).

Fresno County General Plan, Policy Document and Final EIR
Fresno County Zoning Ordinance
Important Farmland 2014 Map, State Department of Conservation

DTC:

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- 2 e) Result in inadequate emergency access?

- 1 f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

XVII. UTILITIES AND SERVICE SYSTEMS

Would the project:

- 2 a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
2 b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
2 c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
2 d) Have sufficient water supplies available to service the project from existing entitlements and resources, or are new or expanded entitlements needed?
2 e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
2 f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
2 g) Comply with federal, state, and local statutes and regulations related to solid waste?

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

- 3 a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
2 b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)
1 c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
STEVEN E. WHITE, DIRECTOR

EVALUATION OF ENVIRONMENTAL IMPACTS

- APPLICANT: ForeFront Power
- APPLICATION NOS.: Initial Study Application No. 7441 and Unclassified Conditional Use Permit Application No. 3609
- DESCRIPTION: Allow a 5 MWac solar photovoltaic power generation facility on a 39-acre portion of a 79.7-acre parcel in the AL-20 (Limited Agricultural, 20-acre minimum parcel size) Zone District.
- LOCATION: The project is located on West Jayne Avenue, 1.2 miles east of its intersection with State Route 33, and northerly adjacent to the nearest city limits of the City of Coalinga. (SUP. DIST. 4) (APN 073-060-12).

I. AESTHETICS

- A. Would the project have a substantial adverse effect on a scenic vista; or
- B. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

FINDING: NO IMPACT:

The project is not located near a scenic vista, scenic highway, or any other scenic resource.

- C. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The proposed project is located in a rural area, and the only nearby development is the Pleasant Valley State Prison, located directly to the south of the project on West Jayne Avenue. The project will be set back approximately 78 feet from the ultimate road right-of-way behind a 6-foot-tall chain-link fence with an additional foot of barbed wire on top. The angle of the solar panels will adjust with the movement of the sun, and at their maximum height, they will not be taller than the proposed fence.

The project will tie into the existing energy grid through a substation located less than one quarter-mile to the south, within the Pleasant Valley State Prison. The connection route will require the installation of new overhead power lines, with up to five new utility poles. There are existing above-ground utility lines running along the southern side of West Jayne Avenue, so the proposed connection will be compatible with the existing aesthetics of the area.

- D. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

The reflection of sunlight off of solar panel surfaces would be the primary source of potential glare from the Project. Solar panels are constituted of many solar cells which are designed to capture solar energy in order to convert it into usable energy. Therefore, solar panels are designed to be as absorptive as possible in order to maximize the efficiency of energy production. Additionally, solar panels are typically covered with a tempered glass layer that is treated with an anti-reflective coating that further reduces the reflectivity of the panels. When compared to common reflective surfaces, solar panels without an anti-reflective coating are found to produce around the same amount of reflectivity as water, which is about half the amount of reflectivity as standard glass that is commonly used in residential or commercial applications (Shields 2010). With the anti-reflective coating, the reflectivity of the panels is reduced to be significantly less than the reflectivity of water.

Lighting will be limited to small-scale lighting fixtures at the access point to the facility on W. Jayne Avenue. To ensure that these lights do not affect the surrounding area, the following mitigation will be included.

* **Mitigation Measure**

1. *Exterior lighting from dusk until dawn shall be minimized through the installation of the lowest wattage bulb necessary for safety purposes. All outdoor lighting shall also be hooded and directed downward so as not to shine upward or toward adjacent properties and public streets.*

II. AGRICULTURAL AND FORESTRY RESOURCES

- A. Would the project convert prime or unique farmlands or farmland of state-wide importance to non-agricultural use?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project would convert 39 acres of locally-important farmland to non-farmland uses. No prime or unique farmland will be affected.

- B. Would the project conflict with existing agricultural zoning or Williamson Act Contracts?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project area is not subject to an existing Williamson Act Contract, but is located in the AL-20 (Limited Agricultural, 20-acre minimum parcel size) Zone District. Only 39 of the 79.9 acres will be used for the proposed solar power generation facility; the remaining area could still be used for agricultural purposes. The Fresno County Department of Agriculture expressed no concerns regarding the project.

- C. Would the project conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production; or
- D. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

FINDING: NO IMPACT:

The proposed project is not in a forest or timberland area.

- E. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural uses or conversion of forest land to non-forest use?

FINDING: LESS THAN SIGNIFICANT:

The proposed project only includes a solar generation facility; it will not create additional housing supply or otherwise affect population growth. A 50-foot or greater buffer between the solar facility and surrounding uses will ensure that the project does not interfere with surrounding agricultural operations.

III. AIR QUALITY

- A. Would the project conflict with or obstruct implementation of the applicable Air Quality Plan; or
- B. Would the project violate any air quality standard or contribute to an existing or projected air quality violation; or
- C. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under a Federal or State ambient air quality standard; or
- D. Would the project expose sensitive receptors to substantial pollutant concentrations; or
- E. Would the project create objectionable odors affecting a substantial number of people?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The County of Fresno is a non-attainment area for PM-10 and Ozone. The San Joaquin Valley Air Pollution Control District (SJVAPCD) reviewed an Air Impact Assessment (AIA) submitted by the applicant for this project and determined that it would produce less than two tons NOx per year and less than two tons PM10 per year, and would therefore not meet the threshold of significance. As a result, SJVAPCD determined that the project will have a less than significant impact on air quality and relevant air quality plans. To ensure that this is the case, the applicant will be required to adhere to the mandatory reporting guidelines set forth by the air district as a condition of project approval.

IV. BIOLOGICAL RESOURCES

- A. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special-status species?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

A biological assessment submitted by the applicant, and review of the project by the California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS), indicate that there is potential for protected species to be present in the project impact area and for those species to be affected by the proposed project. These protected species include the San Joaquin Kit Fox (SJKF), Blunt-nosed Leopard Lizard (BNLL), Tricolored Blackbird, Nelson's Antelope Squirrel (NAS), Swainson's Hawk (SWHA), Burrowing Owl (BUOW), California Glossy Snake, Northern California Legless Lizard, Blainville's Horned Lizard, Short-nosed Kangaroo Rat (SNKR), San Joaquin Coachwhip, Western Spadefoot, San Joaquin Woollythreads, California Jewelflower, Showy Golden Madia, Pale-yellow Layia, Recurved Larkspur, and Brittle scale.

The project site includes approximately 39 acres of land and a gen-tie route, which could create substantial habitat disturbance to creatures already living or foraging there. However, once construction has ceased, the solar panel arrays and exposed soil should be habitable for creatures that live in the area, and it will still provide foraging opportunities for species such as the Swainson's Hawk. There will be infrequent visits to the site for maintenance purposes, but the proposed maintenance and operation will be substantially less threatening to protected species than previous agricultural activities, such as those allowed by right on this parcel according to the Fresno County General Plan. The following mitigation will ensure that any special-status species located on or near the project site are identified and avoided during construction, operation, and decommissioning.

* **Mitigation Measure(s)**

1. *Species-specific surveys shall be conducted by a qualified biologist and/or botanist no less than 14 days and no more than 30 days prior to the onset of any construction-related activities (including initial construction and decommissioning) for the San Joaquin Kit Fox (SJKF), Blunt-nosed Leopard Lizard (BNLL), Tricolored Blackbird, Nelson's Antelope Squirrel (NAS), Swainson's Hawk (SWHA), Burrowing Owl (BUOW), California Glossy Snake, Northern California*

Legless Lizard, Blainville's Horned Lizard, Short-nosed Kangaroo Rat (SNKR), San Joaquin coachwhip, Western Spadefoot, San Joaquin Woollythreads, California Jewelflower, Showy Golden Madia, Pale-yellow Layia, Recurved Larkspur, and Brittle scale. These surveys shall include the gen-tie route, all areas of proposed ground disturbance and construction activities, any construction staging areas, any area in which equipment will be operated and any additional land used for ingress and egress during construction activities. Additionally, a 500-foot buffer around the defined area will be surveyed for the BUOW, SJKF, NAS, and BNLL, a 50-foot buffer area will be surveyed for the SNKR, California Glossy Snake, Blainville's Horned Lizard, Northern California Legless Lizard, and sensitive plants, and a 0.5-mile buffer around the defined area will be surveyed for SWHA nests and tricolored blackbirds. If these buffer areas cannot be maintained, consultation with CDFW is required to determine how to avoid take.

- 2. If any species are identified in pre-construction surveys or during construction, operation, or decommissioning activities, the applicant shall notify CDFW immediately, cease all operation in the area, and consult with CDFW on how to minimize any potential impact to protected species.*
- 3. If BNLL burrows are identified during the pre-construction survey(s), all burrow openings shall be flagged and mapped, and 50-foot no-disturbance buffer zones around all burrow openings shall be maintained for foraging habitat throughout the project.*
- 4. If small mammal burrows suitable for BUOW are identified on the project site or within 250 feet of the project, additional BUOW surveys shall be conducted by a qualified biologist, and BUOW burrows shall be avoided with required buffers according to the "Staff Report on Burrowing Owl Mitigation" (CDFG, 2012).*
- 5. If any construction activities will occur between March 1 and September 15, the project area and a 0.5-mile buffer around the project area must be surveyed by a qualified biologist within 10 days of the onset of construction of activities to identify the presence of any Swainson's Hawk nests. If any nests are identified, no construction may take place within 0.5-miles of that nest until the end of breeding season (September 15) or until a qualified biologist determines that the young have fledged and are no longer dependent on the nest or parents for survival, and CDFW has provided written approval of the biologist's determination. If this 0.5-mile buffer cannot be maintained, consultation with CDFW is required.*
- 6. Implement the January 2011 "U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance" for pre-construction survey protocol and avoidance measures, and maintain habitat permeability for SJKF on all perimeter and interior fencing.*

7. *If construction commences between January 1 and September 15 (bird nesting season) or lapses during this time for 10 or more days, a qualified biologist must survey for active bird nests within 10 days of the onset or resuming of construction activities to ensure that no active bird nests are in the project area that could be impacted by the construction. If nests are present, they must be monitored for the first 24 hours of any project related activities so as to detect any behavioral changes that result from project impacts. If behavioral changes are observed, work that is causing this change shall cease, and the applicant shall consult with the California Department of Fish and Wildlife (CDFW) for additional avoidance and minimization measures. In lieu of monitoring, the applicant may choose to implement 250-foot no disturbance buffers around active nests of non-listed, non-raptor bird species until the breeding season is over or a qualified biologist has determined that the birds have fledged and are no longer dependent upon the nest or parental care for survival. Variance from these buffer zones may be granted on a case by case basis, but this decision must be supported by a qualified biologist and CDFW must be notified of this determination prior to construction activities that would otherwise require a no-disturbance buffer.*
 8. *All vertical pipes associated with solar mounts and fencing must be capped immediately upon installation to avoid bird death or injury.*
 9. *If special status plant species are found, a no-disturbance buffer of at least 50-feet shall be implemented and delineated using flags, stakes, or other highly visible materials, and it shall be maintained for the duration of the project. If this is not feasible, alternative mitigation shall be agreed upon by the applicant and CDFW.*
 10. *No rodenticides, pesticides, or herbicides shall be used during construction, maintenance, or decommissioning of the proposed project.*
 11. *The applicant shall consult with CDFW on the use of biodegradable panel cleaning solution on the project site prior to use so that they may determine if an Incidental Take Permit (ITP) could be warranted.*
- B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS); or
 - C. Would the project have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption or other means; or
 - D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; or

- E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

FINDING: LESS THAN SIGNIFICANT IMPACT:

There is an intermittently flooded riverine wetland running through the northeastern corner of the parcel (USFWS, Wetlands Mapper), but it will not be disturbed by construction activities and is not included in an area that will be improved with solar panels. The project will only impact the southern half of the parcel, and will not come within 500 feet of the stream bed. The land that will be disturbed does not exhibit riparian characteristics, such as typical foliage. Additionally, the intermittent nature of the stream and the distance between the project and the stream will ensure that the movement of any native or migratory fish and wildlife are not impacted. No sensitive natural communities are identified in relevant local or regional policies, and the project will not conflict with any other ordinances protecting biological resources.

V. CULTURAL RESOURCES

- A. Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5; or
- B. Would the project cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5; or
- C. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- D. Would the project disturb any human remains, including those interred outside of formal cemeteries; or
- E. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

The subject parcel has experienced agricultural ground disturbance in the past, most recently in 2017, and the proposed construction of solar arrays on the site should not require ground-disturbance activities substantially greater than that of an agricultural operation. There will also be limited ground disturbance on the southerly adjacent parcel where five utility poles will be installed to connect the proposed facility with an existing substation to facilitate energy transfer. This southerly adjacent parcel is already developed, and due to the limited disturbance that is proposed on this parcel, a less than significant impact is anticipated.

All interested tribes were notified of the proposed project per California Assembly Bill No. 52, and no tribes expressed any concerns or requested to consult on the project. Additionally, it has been determined through a cultural resources assessment and consultation with the Southern San Joaquin Valley Information Center that there are no known historic or cultural resources on site. The archaeological sensitivity of the site is unknown and it has not been previously surveyed. The following mitigation measure will ensure that no cultural resources are lost should they be encountered during the development of the proposed project.

* **Mitigation Measure(s)**

1. *In the event that cultural resources are unearthed during ground-disturbing activities, all work shall be halted in the area of the find. An Archeologist shall be called to evaluate the findings and make any necessary mitigation recommendations. If human remains are unearthed during ground-disturbing activities, no further disturbance is to occur until the Fresno County Sheriff-Coroner has made the necessary findings as to origin and disposition. All normal evidence procedures should be followed by photos, reports, video, etc. If such remains are determined to be Native American, the Sheriff-Coroner must notify the Native American Commission within 24 hours.*

VI. GEOLOGY AND SOILS

- A. Would the project expose people or structures to potential substantial adverse effects, including risk of loss, injury or death involving:
 1. Rupture of a known earthquake;
 2. Strong seismic ground shaking;
 3. Seismic-related ground failure, including liquefaction; or
 4. Landslides?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The probabilistic seismic hazard (10% probability in 50 years) for the project area is 40-60%, so seismic activity is a possibility in the area. There are no steep slopes in the vicinity, so landslides are unlikely. However, the facility will be unmanned and no residential structures are proposed as a part of the project, so risk of loss, injury, and death related to these phenomena will be less than significant.

- B. Would the project result in substantial erosion or loss of topsoil; or
- C. Would the project result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Some grading will be completed as a part of the project to provide a flat surface for the mounting of the solar arrays. The subject parcel and the surrounding area is already relatively flat, and all grading activities proposed will be reviewed and permitted by the County of Fresno's Department of Public Works and Planning. The existing conditions and required oversight will ensure that the project does not contribute to erosion, landslides, spreading, subsidence, liquefaction, or collapse.

- D. Would the project be located on expansive soils, creating substantial risks to life or property?

FINDING: NO IMPACT:

The project is not proposed in an area of expansive soils.

- E. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative disposal systems where sewers are not available for wastewater disposal?

FINDING: NO IMPACT:

No septic systems are proposed as a part of the project.

VII. GREENHOUSE GAS EMISSIONS

- A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- B. Would the project conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The proposed project will produce greenhouse gas emissions during construction and decommissioning. However, these are short-term impacts and they do not meet the significance threshold level of two tons per year set forth by the Central Valley Air Quality Control Board. Therefore, they will not conflict with applicable plans and policies, nor will they have a significant effect on the environment. Only infrequent maintenance trips made in a single pickup truck will take place during the operation of the solar energy production facility.

VIII. HAZARDS AND HAZARDOUS MATERIALS

- A. Would the project create a significant public hazard through routine transport, use or disposal of hazardous materials; or

- B. Would the project create a significant public hazard involving accidental release of hazardous materials into the environment?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The construction, operation, and decommissioning of the proposed facility would require the limited use of hazardous materials. The Fresno County Department of Public Health, Environmental Health Division requires that facilities proposing to use and/or store hazardous materials and/or hazardous wastes shall meet the requirements set forth in the California Health and Safety Code (HSC), Division 20, Chapter 6.95, and the California Code of Regulations (CCR), Title 22, Division 4.5. Additionally, any business that handles hazardous materials or hazardous waste may be required to submit a Hazardous Materials Business Plan pursuant to the HSC, Division 20, Chapter 6.95, and all hazardous waste shall be handled in accordance with requirements set forth in the California Code of Regulations (CRR), Title 22, Division 4.5. Adherence to these guidelines is legally required and the impact is determined to be less than significant.

- C. Would the project create hazardous emissions or utilize hazardous materials, substances or waste within one quarter-mile of a school?

FINDING: NO IMPACT:

The proposed project is 5.9 miles away from the nearest school.

- D. Would the project be located on a hazardous materials site?

FINDING: LESS THAN SIGNIFICANT IMPACT:

There are no hazardous waste facilities on the subject parcel, but the southerly adjacent parcel is a reported small quantities generator of hazardous materials. The southerly adjacent parcel (APN 085-020-35ST) is also where the substation that the project will connect to is located, and where five new utility poles will be installed to connect the proposed solar facility to the existing substation. Federal records hosted by the Environmental Protection Agency (EPA) indicate that the facility is in compliance with all federal regulations. Due to the very limited impact that the project will have on this parcel, these hazardous materials should not be impacted. Additionally, the proposed facility will be unmanned and does not include any new housing. As a result, it can be determined that there will be a less than significant impact.

- E. Would a project located within an airport land use plan or, absent such a plan, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area; or
- F. Would a project located within the vicinity of a private airstrip result in a safety hazard for people residing or working in the project area?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project is located approximately 2.2 miles southeast of the Coalinga Municipal Airport. No housing is proposed and no employees will regularly be on site.

- G. Would the project impair implementation of or physically interfere with an adopted Emergency Response Plan or Emergency Evacuation Plan?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Improvements will be made to the subject parcel, but no housing will be built and no employees will routinely be onsite. Additionally, no existing routes of travel will be blocked as a result of the proposed development. Therefore, the project will not interfere with any adopted emergency plans.

- H. Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project area is partially classified as being in Fire Hazard Class Non-Wildland/Non-Urban and is partially classified as having a Moderate Fire Hazard Class. Due to the 50-foot required buffer between the solar arrays and neighboring uses, the potential for a fire to start on site and spread to the surrounding area is reduced. No housing will be created and there will be no employees at the facility. Additionally, all plans must be approved by the Fresno County Fire Protection District (FCFPD) prior to permitting. Risk of loss, injury or death involving wildland fires will not be significantly impacted by the proposed project.

IX. HYDROLOGY AND WATER QUALITY

- A. Would the project violate any water quality standards or waste discharge requirements or otherwise degrade water quality?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The solar panels will be washed intermittently with a biodegradable panel cleaning solution that will be trucked in from off site. This solution will not be used within 500 feet of the seasonal stream that crosses the northeastern corner of the site. All water quality standards and waste discharge requirements will be adhered to.

- B. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge so that there would be a net deficit in aquifer volume or a lowering of the local groundwater table?

FINDING: NO IMPACT:

There are no existing wells on site and no wells will be drilled. No water will be used during the operation of this facility. The local groundwater table and the aquifer will not be impacted.

- C. Would the project substantially alter existing drainage patterns, including alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site; or
- D. Would the project substantially alter existing drainage patterns, including alteration of the course of a stream or river, in a manner which would result in flooding on or off site?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

There is a seasonal stream that runs through the northeastern corner of the property (USFWS, Wetlands Mapper). However, only the southern half of the 79.7-acre property will be developed as a result of the project, and all construction activities will occur at least 500 feet from the streambed. To ensure a less than significant impact, the following mitigation will be incorporated.

* **Mitigation Measure**

1. *Delineate all surface water features, streams, and associated floodplains and vegetation within 500 feet of the project impact area. No construction may encroach within this area without first obtaining a Lake and Streambed Alteration Agreement (LSA) from the California Department of Fish and Wildlife (CDFW).*

- E. Would the project create or contribute run-off which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted run-off; or
- F. Would the project otherwise substantially degrade water quality?

FINDING: LESS THAN SIGNIFICANT IMPACT:

No water will be used on site and most of the parcel's surface will remain permeable. Existing storm water drainage flows will not be significantly impacted, and a new drainage system will not be necessary as a result of the project.

- G. Would the project place housing within a 100-year floodplain; or
- H. Would the project place structures within a 100-year flood hazard area that would impede or redirect flood flows; or
- I. Would the project expose persons or structures to levee or dam failure; or
- J. Would the project cause inundation by seiche, tsunami or mudflow?

FINDING: NO IMPACT:

No housing is proposed and the subject parcel is located in an area of minimal flood hazard (FEMA Panel 06019C3250H). There will be no employees or residents on site, and there are no nearby levees or dams. The project is not near the ocean, a lake, or any steep slopes. The location and scope of the project precludes it from causing inundation by seiche, tsunami or mudflow.

X. LAND USE AND PLANNING

- A. Will the project physically divide an established community?

FINDING: NO IMPACT:

The project is located four miles west of the community of Coalinga and will result in the development of an agricultural parcel. The surrounding area includes the Pleasant Valley State Prison and agricultural land. No established communities will be divided.

- B. Will the project conflict with any Land Use Plan, policy or regulation of an agency with jurisdiction over the project?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project does conflict with Fresno County's Coalinga Regional Plan, which was adopted in 1974. This land use plan indicates that the project site should be reserved for a proposed reservoir. According to this plan, the reservoir was advocated for by the City of Coalinga. However, a reservoir in this location is not currently included in the City of Coalinga's land use plan, and the City has stated that it is not opposed to the proposed project and that they have no plans for a future reservoir or park near the project site. The project will not interfere with the future development plans of any local agencies.

- C. Will the project conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan?

FINDING: NO IMPACT:

There are no conservation plans applicable to the project area.

XI. MINERAL RESOURCES

- A. Would the project result in the loss of availability of a known mineral resource; or
- B. Would the project result in the loss of availability of a locally-important mineral resource recovery site designated on a General Plan?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The Fresno County General Plan Background Report (FCGPBR) indicates that the project is located on a known oil field. State Division of Oil, Gas, and Geothermal Resources records indicate that an oil well was previously drilled on the subject parcel, and that it was properly abandoned in 1954. The proposed development will not impact the availability of oil in the area, and the northern half of the parcel will remain undeveloped and could provide access to underground oil reserves if desired.

XII. NOISE

- A. Would the project result in exposure of people to severe noise levels; or
- B. Would the project result in exposure of people to or generate excessive ground-borne vibration or ground-borne noise levels; or
- C. Would the project cause a substantial permanent increase in ambient noise levels in the project vicinity; or
- D. Would the project result in a substantial temporary or periodic increase in ambient noise levels?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Construction activities will produce noise and vibration, but this will be a short-term impact. Once construction has been completed, minimal noise will be produced by infrequent maintenance activities and electrical equipment.

- E. Would the project expose people to excessive noise levels associated with a location near an airport or a private airstrip; or
- F. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project is approximately 2.2 miles southeast of Coalinga Municipal Airport. The proposed solar facility will have no employees and will create no new housing. No people will be exposed to excessive air traffic noise as a result of the project.

XIII. POPULATION AND HOUSING

- A. Would the project induce substantial population growth either directly or indirectly; or
- B. Would the project displace substantial numbers of existing housing; or
- C. Would the project displace substantial numbers of people, necessitating the construction of housing elsewhere?

FINDING: NO IMPACT:

No housing will be created or destroyed, and no employees will work on site. Population and housing will not be impacted.

XIV. PUBLIC SERVICES

A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically-altered public facilities in the following areas:

1. Fire protection;
2. Police protection;
3. Schools;
4. Parks; or
5. Other public facilities?

FINDING: NO IMPACT:

The generation of solar energy will not affect any public facilities or services, nor will it create an increased demand for such services.

XV. RECREATION

- A. Would the project increase the use of existing neighborhood and regional parks; or
- B. Would the project require the construction of or expansion of recreational facilities?

FINDING: NO IMPACT:

The proposed project will not affect the population or demographics of the area. Recreational facilities will not be affected.

XVI. TRANSPORTATION/TRAFFIC

- A. Would the project conflict with any applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation; or
- B. Would the project conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demands measures; or

C. Would the project result in a change in air traffic patterns?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Less than one traffic trip per day will be made for security and maintenance purposes. Circulation, congestion, and air traffic volume will not be impacted.

D. Would the project substantially increase traffic hazards due to design features?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The solar arrays are oriented to be perpendicular to West Jayne Avenue so that sunlight will not be reflected toward the road. The project will not create traffic hazards.

E. Would the project result in inadequate emergency access?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The only nearby development is the Pleasant Valley State Prison, and emergency access to this facility will not be impacted because it is located across the street from the project. The proposed facility will be gated, but no housing will be built, and all plans will be subject to the approval of the Fresno County Fire Protection Department.

F. Would the project conflict with adopted plans, policies or programs regarding public transit, bicycle or pedestrian facilities or otherwise decrease the performance or safety of such facilities?

FINDING: NO IMPACT:

Ridership, access, and safety of public transit and pedestrian facilities will not be impacted by the installation of a solar energy facility on an undeveloped parcel in a sparsely-developed area.

XVII. UTILITIES AND SERVICE SYSTEMS

A. Would the project exceed wastewater treatment requirements; or

B. Would the project require construction of or the expansion of new water or wastewater treatment facilities; or

C. Would the project require or result in the construction or expansion of new storm water drainage facilities; or

D. Would the project have sufficient water supplies available from existing entitlements and resources, or are new or expanded entitlements needed; or

E. Would the project result in a determination of inadequate wastewater treatment capacity to serve project demand; or

- F. Would the project be served by a landfill with sufficient permitted capacity; or
- G. Would the project comply with federal, state and local statutes and regulations related to solid waste?

FINDING: LESS THAN SIGNIFICANT IMPACT:

No solid waste will be generated during the operation of the facility. Any solid waste produced during construction will be carried off site and disposed of appropriately.

No wastewater will be produced because no water will be used on site, no structures will be built on site, and no people will live or work on site. A biodegradable panel cleaning solution will be used to clean the solar panels instead of water.

The installation of solar panels will slightly reduce permeability, but not to the extent that storm water drainage facilities would be necessary.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

- A. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California prehistory or history?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

Potential impacts to Aesthetics, Biological Resources, Cultural Resources, and Hydrology and Water Quality were identified. However, incorporation of the Mitigation Measures indicated in Section I, IV, V, and IX will ensure that these impacts are not significant.

- B. Does the project have impacts that are individually limited, but cumulatively considerable?

FINDING: LESS THAN SIGNIFICANT IMPACT:

No cumulative impacts, such as traffic congestion, greenhouse gas emissions, water quality, or aquifer depletion were identified during the review of this project.

- C. Does the project have environmental impacts which will cause substantial adverse effects on human beings, either directly or indirectly?

FINDING: NO IMPACT:

No adverse impacts to human beings, either direct or indirect, were identified in the project analysis.

CONCLUSION/SUMMARY

Based upon the Initial Study prepared for Unclassified Conditional Use Permit Application No. 3609, staff has concluded that the project will not have a significant effect on the environment. It has been determined that there will be no impacts to Population and Housing, Public Services, and Recreation.

Potential impacts related to Agricultural and Forestry Resources, Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use Planning, Mineral Resources, Noise, Transportation and Traffic, and Utilities and Service Systems have been determined to be less than significant.

Potential impacts relating to Aesthetics, Biological Resources, Cultural Resources, and Hydrology and Water Quality have been determined to be less than significant with compliance with the Mitigation Measures.

A Mitigated Negative Declaration is recommended and is subject to approval by the decision-making body. The Initial Study is available for review at 2220 Tulare Street, Suite A, Street Level, located on the southwest corner of Tulare and "M" Street, Fresno, California.

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Pre-Application Submittal

Project: Gates Solar

Scope: 5 MWac solar photovoltaic energy generation facility on a +/-39-acre portion of a 79.7-acre parcel.

Location: APN 073-060-12

Applicant's Representative:

EPD Solutions, Inc.

c/o Rafik Albert

2030 Main Street, Suite 1200

Irvine, Calif. 92614

(949) 794-1182

rafik@epdsolutions.com

Operational Statement

1. *Nature of the operation—what do you propose to do? Describe in detail.*
The project is a solar photovoltaic power plant. The facility will generate electricity from the sun during daylight hours, and will be unmanned. The project would interconnect with the electrical grid about 1,230 feet to the south, at an existing substation located within Pleasant Valley State Prison. A collector power line would cross Jayne Avenue and be routed within the prison to the substation.
2. *Operational time limits:*
The facility will operate during daylight hours year-round. Operations would be automated and not require a staff presence.
3. *Number of customer or visitors:*
The site would not receive customers or visitors.
4. *Number of employees:*
The facility will be unmanned. Occasional site visits (generally less than one per day) would occur for security and maintenance.
5. *Service and delivery vehicles (number, type, frequency):*
The facility would not receive any regular deliveries during operations. Service visits would occur periodically on an as-needed basis, and would generally require only a pick-up truck
6. *Access to the site (public road, private road, surface, unpaved/paved):*
The site is adjacent to Jayne Avenue, a public, paved road.
7. *Number of parking spaces for employees, customers, and service/delivery vehicles:*
As the facility will be unmanned and not receive customers or visitors, no parking is required or proposed.
8. *Are any goods to be sold on-site? If so, are these goods grown or produced on-site or at some other location?*

No goods would be grown, produced, or sold on-site.

9. *What equipment is used (if appropriate, provide pictures or a brochure):*

Equipment used on the site would include:

- Solar modules mounted on trackers
- Electrical equipment pad with switchgear

10. *What supplies or materials are used and how are they stored?*

No supplies or materials would routinely be used at the site, and no storage would occur at the site. Any items required for periodic maintenance would be carried on maintenance vehicles.

11. *Does the use cause an unsightly appearance (noise, glare, dust, odor, if so explain how this will be reduced or eliminated):*

The use is minimally impactful on the surrounding area. The proposed equipment will generate minimal noise. Solar panels do not generate substantial glare. The project will not generate any dust or odor during operations.

12. *List any solid or liquid wastes to be produced:*

The facility will not generate solid or liquid wastes. No process wastewater is generated during energy generation from a photovoltaic facility. The site will be unmanned so no restrooms would be required and no sewer connection or septic system would be installed. Any solid wastes generated during maintenance activities would be removed by maintenance crews when they depart the site.

13. *Estimated volume of water to be used (gallons per day, source of water):*

The site will be unmanned and no water use would be required. In lieu of water, a commercially available biodegradable solution will be used for panel cleaning.

14. *Describe any proposed advertising including size, appearance, and placement:*

No advertising is proposed.

15. *Will existing buildings be used or will new buildings be constructed (describe type of construction materials, height, color, etc. Provide floor plan and elevations, if appropriate):*

The site contains no existing buildings, and no new habitable structures are proposed. New construction on the site would be limited to solar trackers and related electrical equipment and a perimeter fence. See enclosed plans.

16. *Explain which buildings or what portion of buildings will be used in the operation:*

There are no existing buildings on the site and no new habitable structures are proposed.

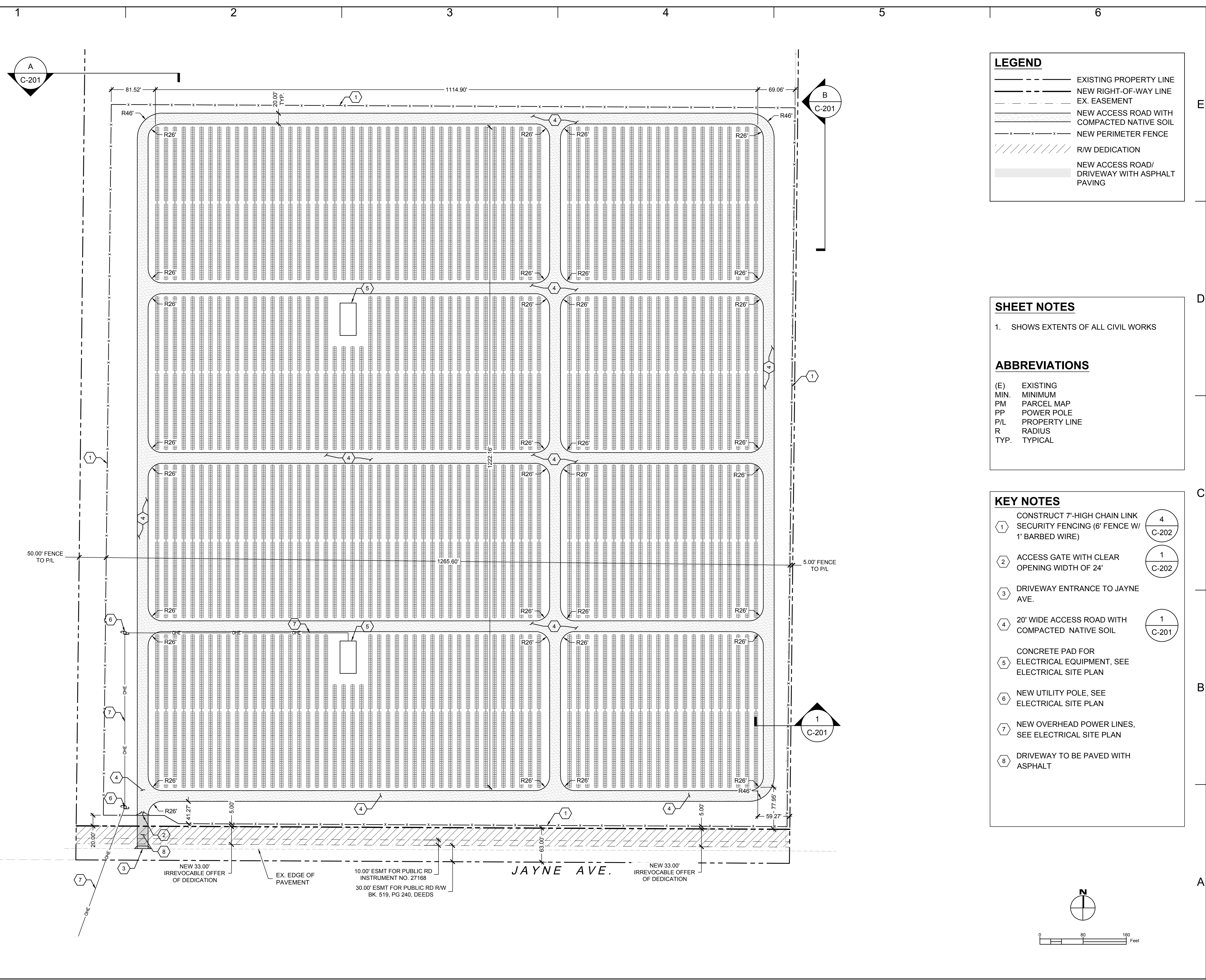
17. *Will any outdoor lighting or an outdoor sound amplification system be used (describe and indicate when used):*

Outdoor lighting would be limited to small-scale security lighting at the entry and any domestic fixtures required by Building Code or other Code requirements at electrical equipment, such as transformers.

18. *Landscape or fencing proposed (describe type and location):*

Fencing is proposed to consist of a perimeter chain link fence with barbed wire. No landscaping is proposed.

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LEGEND

- EXISTING PROPERTY LINE
- NEW RIGHT-OF-WAY LINE
- - - EX. EASEMENT
- NEW ACCESS ROAD WITH COMPACTED NATIVE SOIL
- x - x - x - NEW PERIMETER FENCE
- /// R/W DEDICATION
- NEW ACCESS ROAD/ DRIVEWAY WITH ASPHALT PAVING

SHEET NOTES

1. SHOWS EXTENTS OF ALL CIVIL WORKS

ABBREVIATIONS

(E) EXISTING
 MIN. MINIMUM
 PM PARCEL MAP
 PP POWER POLE
 P/L PROPERTY LINE
 R RADIUS
 TYP. TYPICAL

KEY NOTES

1 CONSTRUCT 7'-HIGH CHAIN LINK SECURITY FENCING (6' FENCE W/ 1' BARBED WIRE) 4 C-202

2 ACCESS GATE WITH CLEAR OPENING WIDTH OF 24' 1 C-202

3 DRIVEWAY ENTRANCE TO JAYNE AVE. 1 C-201

4 20' WIDE ACCESS ROAD WITH COMPACTED NATIVE SOIL 1 C-201

5 CONCRETE PAD FOR ELECTRICAL EQUIPMENT, SEE ELECTRICAL SITE PLAN

6 NEW UTILITY POLE, SEE ELECTRICAL SITE PLAN

7 NEW OVERHEAD POWER LINES, SEE ELECTRICAL SITE PLAN

8 DRIVEWAY TO BE PAVED WITH ASPHALT

FOREFRONT POWER

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 www.ForeFrontPowerLLC.com

SAGE
 Consulting Engineers, Inc.

12 Geary Street, Suite 407
 San Francisco, CA 94108
 (415) 890-5250
 www.Sage-CE.com

STAMP:

CA-SB43 GATES PV POWER PLANT

FOREFRONT POWER LLC
 JAYNE AVENUE
 COALINGA, CA, 93210

PROJECT NUMBER:
 CA-17-0102 / J0063

SHEET TITLE:
 SITE PLAN

SHEET SIZE:
 ARCH "D"
 24" X 36" (610 x 914)

0 1/2" 1"

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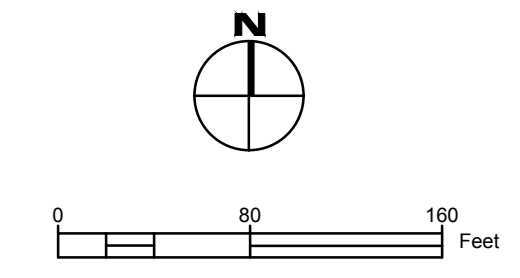
NO.	REVISION	DATE	INIT.
1	R/W DEDICATION	9/04/2018	KH

DATE: 9/12/2018
 DRAWN BY: RCS
 ENGINEER: KMH
 APPROVED BY: KMH

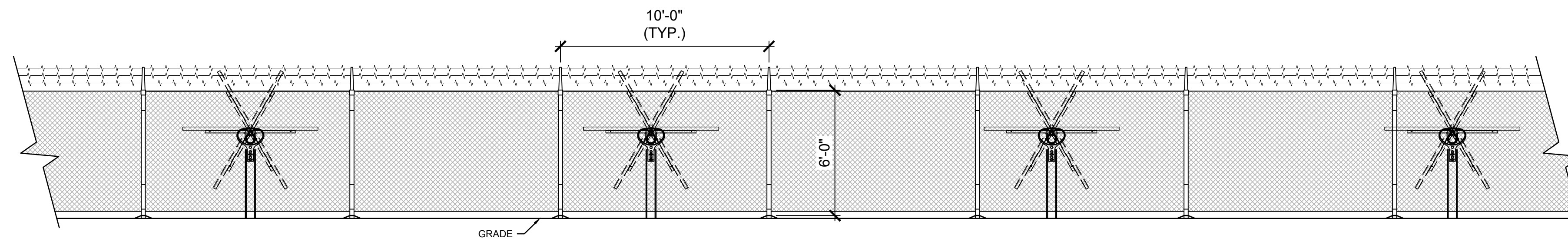
PROJECT PHASE:
 CUP SUBMITTAL

SCALE:
 1" = 80'

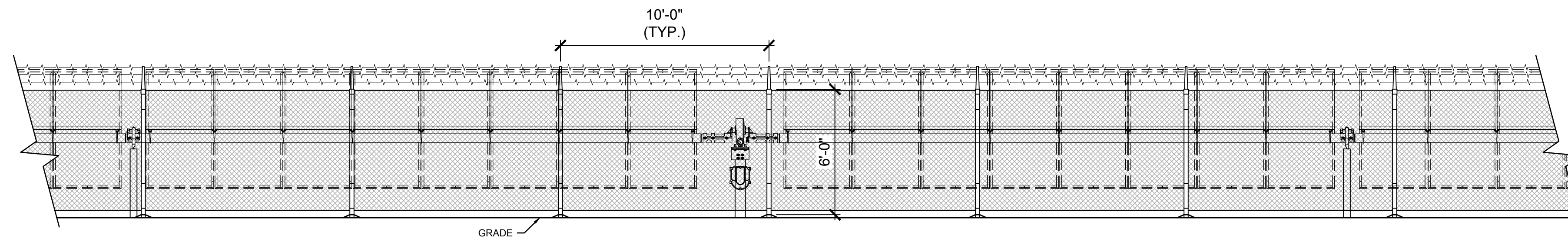
SHEET NO.:
C-101



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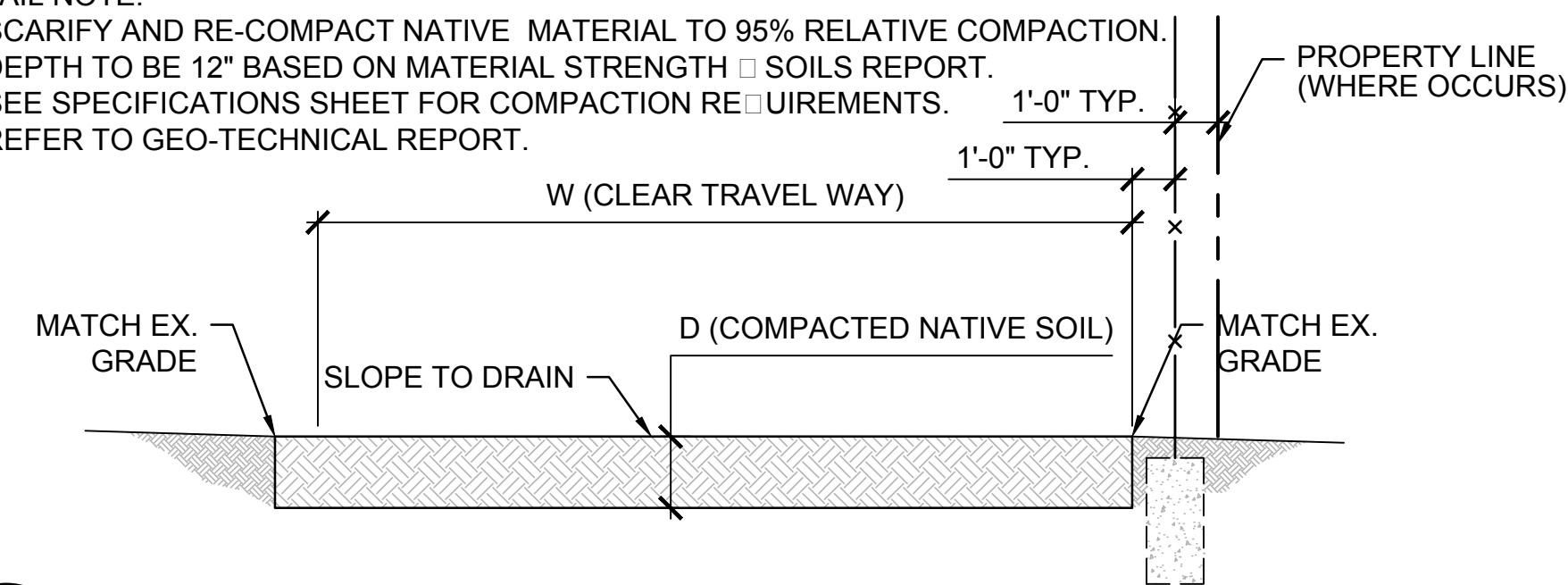
A NORTH-SOUTH ELEVATION
 SCALE: 1/4" = 1'-0"



B EAST-WEST ELEVATION
 SCALE: 1/4" = 1'-0"

DETAIL NOTE:

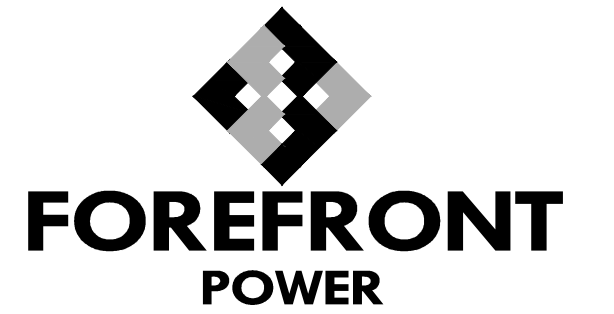
1. SCARIFY AND RE-COMPACT NATIVE MATERIAL TO 95% RELATIVE COMPACTION.
2. DEPTH TO BE 12" BASED ON MATERIAL STRENGTH □ SOILS REPORT.
3. SEE SPECIFICATIONS SHEET FOR COMPACTION REQUIREMENTS.
4. REFER TO GEO-TECHNICAL REPORT.



1 INTERNAL ACCESS ROAD
 SCALE: 1/4" = 1'-0"

SHEET NOTES

1. note □



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 www.sage-CE.com

STAMP:

DATE: XXX/XXXX

**CA-SB43 GATES PV
 POWER PLANT**
 FOREFRONT POWER LLC
 JAYNE AVENUE
 COALINGA, CA, 93210

PROJECT NUMBER:
 CA-17-0102 / J0063

SHEET TITLE:
 SECTIONS □ DETAILS

SHEET SIZE:
 ARCH "D"
 24" X 36" (610 x 914)

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NO.	REVISION	DATE	INIT.

DATE: 01/16/2018
 DRAWN BY: RCS
 ENGINEER: KMH
 APPROVED BY: KMH

PROJECT PHASE:
 CUP SUBMITTAL

SCALE:
 AS SHOWN

SHEET NO.:
C-201

Pest Management Plan

**Gates Solar Project
APN 073-060-12**

ForeFront Power, LLC
100 Montgomery St., Suite 1400
San Francisco, CA 94104

September 18, 2018

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1.0 Project and Objectives

ForeFront Power, LLC is proposing to develop and operate a 5 MWac solar photovoltaic energy generation facility on a 39-acre portion of an 80-acre parcel (APN 073-060-12) in unincorporated Fresno County, near the city of Coalinga. The project site is located on the north side of Jayne Avenue, 1.2 miles east of Highway 33 (Figures 1 and 2). The project site is located at an elevation of about 565 feet and is generally flat. The site consists of agricultural land, with active production of common wheat. Surrounding land uses are predominantly agricultural to the west and southwest, with highly disturbed undeveloped land to the north and east, Pleasant Valley State Prison to the south, and Coalinga State Hospital to the southeast. The proposed project site plan is depicted in Figure 3.

General site investigations of the 80-acre study area were conducted on September 2, 2017, during which the site and the surrounding area were evaluated for the presence of various plant and animal species, including rodents. The results of the site visit and a literature review are contained in Phoenix Biological Consulting (2017).

The purpose of this Pest Management Plan is to discuss potential pest problems that may occur within the boundaries of the project site during the life of the solar project. In addition, the Plan outlines the various methods for preventing and/or controlling potential pest problems that may arise during operation of the solar facility.

This Plan provides information on the various pests known to occur in the region that could potentially cause an infestation on the property. Available resources and various control measures are discussed below which will help to control any future pest problems, if they occur. As necessary, various measures will be implemented to control any rodent populations present on the site in such a manner as to ensure minimal impact to the environment.

2.0 Existing Site Conditions

2.1 Vegetation

The 80-acre study area consists of highly disturbed agricultural lands used for active production of common wheat (*Triticum aestivum*). There are no trees in or bordering the site. The soils consist of Posochanet, Lethent, and Excelsior loams. The soils on the western portion of the site consists of Posochanet clay loam, saline-sodic (0-2% slope). The soils center on the eastern portion of the site consists of Lethent clay loam (0-1% slope), and a small portion on the southern border of the site consists of Excelsior sandy loam (0-2% slope). The production of wheat is the predominant vegetation on site. Plants identified on site during the site visit are listed in Table 1.

Table 1. Vascular Plants Detected during Site Visit

FAMILY Species	Common Name	Habit
CHENOPODIACEAE		
<i>Salsola tragus</i>	Russian thistle	non-native annual herb
EUPHORBIACEAE		
<i>Eremocarpus setigerus</i>	turkey mullein	native annual herb
POACEAE		
<i>Bromus madritensis</i>	red brome	non-native perennial grass
<i>Bromus madritensis ssp. Rubens</i>	compact brome	non-native perennial grass
<i>Cynodon dactylon</i>	Bermuda grass	non-native perennial grass
<i>Triticum aestivum</i>	Common wheat	native annual grass

2.2 Wildlife

Table 2 lists wildlife identified on the site during the site visit.

Table 2. Vertebrates Detected during Site Visit

Mammals
black-tailed jackrabbit (<i>Lepus californicus</i>)

Although not seen during the site visit, various small rodents are also known to inhabit the general region. These include:

Voles, Moles, and Pocket Gophers: There are six vole species that occur throughout California; the California vole (*Microtus californicus*) is the most common. California voles are typically found in grassland communities and wet meadows (CDFW, 1990). Voles frequently cause damage to a wide range of ornamental plants and may also damage other landscape plantings (University of California, 2010).

Moles (*Scapanus* sp.) are small mammals that are widely distributed throughout the dry regions of the Central Valley. The species lives entirely underground and normally has an extensive system of interconnecting tunnels. The greatest damage from mole activities is primarily from their burrowing activities that can create mounds and ridges throughout an area and undermine support structures.

Pocket gophers (*Thomomys* sp.) are one of the more common mammals throughout California and population density can sometimes reach very high levels (60+ gophers per acre) (CDFW, 1990). Botta's gophers are the most common gopher species in the area and are most likely to occur on the project site. Gophers are prolific diggers and can do considerable damage within a relatively short time (University of California, 2009). The first sign of the species is usually numerous mounds of dirt scattered throughout the area.

Rats: Norway rats (*Rattus norvegicus*) and roof rats (*Rattus rattus*), which are species introduced to North America, have been observed throughout California, and create a significant amount of damage wherever they are present. They typically consume large amounts of food (i.e., grain, etc.) and are responsible for contaminating food that has been stored (University of California, 2003). In addition to the damage they can cause, they are the carriers of various diseases.

Mice: The common house mouse (*Mus musculus*) also occurs throughout California and is most commonly seen in association with structures (i.e., houses, sheds, barns, etc.). The house mouse is one of the more damaging rodents in the country and typically consumes and contaminates food wherever it is found (University of California, 2010). They thrive under a variety of conditions such as in and around houses and commercial structures as well as in open fields and on agricultural land. House mice consume and contaminate food meant for humans, pets, livestock, and other animals. In addition, they cause considerable damage to structures and property, and they can transmit pathogens and cause disease such as salmonellosis, a form of food poisoning.

California Ground Squirrels: This species of ground squirrel (*Spermophilus beecheyi*) is one of the more common ground squirrels and is associated with grassland habitats, particularly in disturbed areas and along roadsides (CDFW, 1990). Damage done by the species consists primarily due to excavation of burrows that could potentially undermine structures such as support poles and pilings.

3.0 Control Options and Removal Methods

3.1 Preventive Controls

Preventive controls are used to minimize rodent infestations in areas of concern and involve numerous approaches. As noted in Section 2.0, the main rodents likely to occur on the site include voles, rats, mice, gophers, and California ground squirrels. Preventive measures for each of these species are somewhat different; however, there are several measures common to all that can be implemented for the project as needed. These measures are summarized below:

Managing Vegetation: Rodents typically occur in areas where vegetation is allowed to grow; therefore, the vegetative cover throughout the site should be controlled. This can be achieved

through periodic mowing. Mowing will also be required to ensure plant growth does not create a fire hazard by interfering with solar panels.

Tilling: Plowing can be an effective measure in controlling rodents. Tilling must be performed on a regular basis to ensure control of rodent populations.

Fencing: Specialized fencing designed to exclude small mammals can sometimes be an effective measure in controlling animals, particularly in dealing with larger mammals such as California ground squirrels. However, fencing is most effective when utilized for relatively small projects. Installing specialized fencing would not be a cost-effective means in controlling small rodents for the proposed project.

Natural Control: Natural predators such as hawks and falcons do occur in the area and prey on voles, rats, and ground squirrels on a regular basis. Raptors are expected to utilize the site during hunting activities; however, it would be difficult to ensure frequent or constant “patrol” of the site by hawks and falcon.

3.2 Removal Methods

In the event a rodent infestation occurs on the site or in certain portions of the property, various removal methods may need to be used to remove or at least lower the number of pests present on the site. Construction of the proposed solar project will have the benefit of reducing the number of rodents which may presently occur on the site due to modification and removal of the existing vegetation present on the site. As part of the construction process, the site will be graded and all current vegetation will be removed. Some natural re-vegetation will occur over time and rodents will naturally be reintroduced; consequently, pests may need to be controlled through removal practices.

Removal of various rodent species through trapping measures is an effective way to control populations of pests; however, trapping is labor intensive and can be relatively expensive. Trapping is most effective when dealing with small projects and on those projects where the rodents are confined to a relatively small portion of the site.

Trapping may be an effective measure for the project if the rodent infestation problem is confined to a small area but if the rodents are evenly dispersed throughout the site, baiting (see below) may be a more effective measure. In the event an infestation problem does arise, the site operations manager should consult with a pest control expert to determine if trapping is suitable.

4.0 Conclusion

Pests are not expected to be an issue of significant concern for the solar project, as the project will not produce any crops or other plant materials that might attract the various rodents known to occur in the area. Vegetation management will be required to avoid interference of grasses with solar panels and electrical equipment; this will reduce the amount of useful habitat for pests on the site. In addition, mowing activities will keep the vegetation cover at a low level which will expose rodents to potential prey species such as hawks, falcons, and coyotes.

Managing the vegetation is the first line of defense against rodent infestation. However, if an infestation does occur during the operational phase of the project, a professional exterminator should be consulted to determine the rodents which are causing the problem, and to determine the best approach for dealing with the specific rodents present. The consultant will also be able to determine which baits can be used in accordance with local, State, and federal laws.

5.0 References

California Department of Fish and Game

1990. California Wildlife: Volume III (Mammals).

Phoenix Biological Consulting.

December 2017. Biological Habitat Assessment for Anderson Gates Site.

RCA Associates, LLC.

August 2016. Pest Management Plan. Giffen Solar Park.

University of California

January 2003. Agriculture and Natural Resources: Statewide Integrated Pest Management Program. Pest Notes Publication 74106 (Rats).

September 2009. Agricultural and Natural Resources. Statewide Integrated Pest Management Program. Pest Notes 7433 (Pocket Gophers).

June 2010. Agriculture and Natural Resources: Statewide Integrated Pest Management Program. Pest Notes Publication 7439 Voles (Meadow Mice).

December 2012. Agricultural and Natural Resources: Statewide Integrated Pest Management Program. Pest Notes Publication 74115 (Moles).

Reclamation Plan

Gates Solar Project

APN 070-020-07

County of Fresno

ForeFront Power, LLC
100 Montgomery St., Suite 1400
San Francisco, CA 94104

January 31, 2018

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1. Present use of the site

The Gates Solar (project) site is located on an 80-acre parcel (APN 073-060-12) in unincorporated Fresno County, near the city of Coalinga. The project site is located on the north side of Jayne Avenue, 1.2 miles east of Highway 33 (Figures 1 and 2). The present General Plan land use designation is Westside Rangeland and the zoning is AE-20 and AE-40.

The project site is located at an elevation of about 565 feet and is generally flat. The site consists of agricultural land, with active production of common wheat. Surrounding land uses are predominantly agricultural to the west and southwest, with highly disturbed undeveloped land to the north and east, Pleasant Valley State Prison to the south, and Coalinga State Hospital to the southeast.

2. Proposed alternate use of the land

ForeFront Power, LLC is proposing to develop and operate a 5-MWac solar photovoltaic energy generation facility on a 39-acre portion of the 80-acre parcel. Components of the facility will include a ground-mounted field of solar trackers and associated electrical equipment, including inverters and transformers; perimeter fencing; and interconnection to the electrical grid at an existing substation south of the site, within Pleasant Valley State Prison. The majority of the construction activities will occur above ground; however, there will be minimal subsurface construction for tracker piles, electrical conduit systems, and racking systems.

3. Duration

The project is being designed to have a functional operating life cycle of a minimum 25 years to a maximum of 35 years, contingent on the power off-take agreement and the operational date, currently targeted as June 2019. Under the current site control agreement, the project could remain in operation until June 2044.

4. Ownership of property

The subject property is subject to a 25-year lease between ForeFront Power, LLC (lessee) and James S. Anderson (property owner/lessor).

5. Reclamation plan

5-a) As the project is taken offline and permanently out of service, the reclamation process will commence to restore the project site to its previous agricultural condition. The entire reclamation of the site will be complete approximately 12 months after plant is taken off-line. As a result of the relatively basic design and minimal footprint of the project, the reclamation process will be simple to execute and will be completed in one phase. Demolition and reclamation will include removal of all above ground and subsurface equipment, structures, and

fences. All foundations will be demolished and removed from the site, and all necessary grading will be performed to return the site to its original grade. All removed and demolished infrastructure and components will be salvaged and recycled as available.

5-b) No hazardous chemicals or materials will be present at any time during normal site operations of the project. No additional precaution or handling methodologies will be necessary during the reclamation process. All transformers and high voltage electrical equipment will be recycled as per manufacturer requirements and coolant will be disposed of pursuant to California and Fresno County law.

5-c) All electrical equipment will be uninstalled and removed. Electrical equipment includes: inverters, PV modules, combiner boxes, transformers, switchgear, monitoring equipment, and any other on-site equipment and all affiliated cabling. The equipment will either be reused or recycled depending on its equipment, warranties, technical improvements, and market valuation. All mounting structures will be removed and recycled as possible. Any and all building improvements on the site will be demolished and removed.

5-d,e) All below-grade foundations will be demolished and removed, including concrete, rebar, and associated debris. All subsurface conduit and cabling that is not deemed necessary by the utility will be uninstalled and recycled. Any below grade facilities deemed necessary by the utility will remain buried and marked for identification.

5-f) All requisite grading required to restore the site to its original condition. Due to the low impact of the disk-and-roll approach used during site preparation and the flat condition of the project parcel, it is anticipated that minimal re-grading will be required during reclamation.

5-g) During the reclamation process the site will be return to its previous agricultural state through de-compaction of the site, as needed. Due to the disc-and-roll site preparation technique, it is expected that requisite de-compaction will be limited. The reclamation process will involve the input of the landowner to consult on site restoration for agricultural use, as they were the original users of the site in its agricultural state.

5-h) There is no irrigation system currently present on the project site. No irrigation will be required during operations.

6. Site Plan

See Figure 3.

7. Engineering cost estimate

Civil Demolition	Quantity	Unit	Labor	TOTAL
Panel Removal	21,006	EA	\$ 1.75	\$ 36,760.50
Steel Structure Disassembly	1	LS	\$ 16,000.00	\$ 16,000.00
Driven Pile Foundation Removal	3,400	EA	\$ 5.00	\$ 17,000.00
Fencing Demolition	5,140	LF	\$ 2.50	\$ 12,850.00
Access Road Demolition	192,840	SF	\$ 0.25	\$ 48,210.00
			Total	\$ 130,820.50

Electrical Demolition	Quantity	Unit	Labor	TOTAL
Removal of Wire & Grounding Rods (including dismantle & load)	1	LS	\$ 15,000.00	\$ 15,000.00
Inverters / Parallel Gear / Combinor Boxes (including dismantle, load & disposal)	1	LS	\$ 15,000.00	\$ 15,000.00
			Total	\$ 30,000.00

Hauling	Quantity	Unit	Unit Weight (lbs)	Total Weight (tons)	\$/Load	TOTAL
Panel	21,006	EA	61.7	648.04	\$ 300.00	\$ 194,410.53
Driven Pile Foundations	3,400	EA	100	170.00	\$ 250.00	\$ 25,000.00
Tracker Structure Supports	3,400	EA	200	340.00	\$ 250.00	\$ 50,000.00
Copper (wire, inverter & parallel gear)	1	LS			\$ 1,000.00	\$ -
					Total	\$ 269,410.53

Disposal Fees	Quantity	Unit	Unit Price	TOTAL
Dump Fees (Panels)	648.0	ton	\$ 35.00	\$ 22,681.23
Dump Fees (Building waste)	-	ton	\$ 25.00	\$ -
Dump Fees (Concrete)	5.0	ton	\$ 25.00	\$ 125.00
			Total	\$ 22,806.23

PRICES ARE SUBJECT TO CHANGE

PRICES WILL FLUCTUATE W/ MARKET CONDITIONS

Civil Demolition	\$ 130,820.50
Electrical Demolition	\$ 30,000.00
Hauling	\$ 269,410.53
Disposal Fees	\$ 22,806.23
Total Decommission Cost	\$ 453,037.26
Salvage Value (%)	50.0%
Net Decommission Cost	\$ 226,518.63

8. Financial assurances

ForeFront Power, LLC will provide the County of Fresno with a Letter of Credit in the amount of \$453,037. The Letter of Credit will increase annually by 3%, or be tied to the Consumer Price Index (CPI) or other mechanism acceptable to the Fresno County Department of Public Works and Planning.

9. Evidence that all owners have been notified

A lease agreement with the property owner, James S. Anderson, is in place. The lease agreement authorizes ForeFront Power, LLC to construct, operate, maintain, and decommission the solar project on the project site.

Figure 1. Project Location

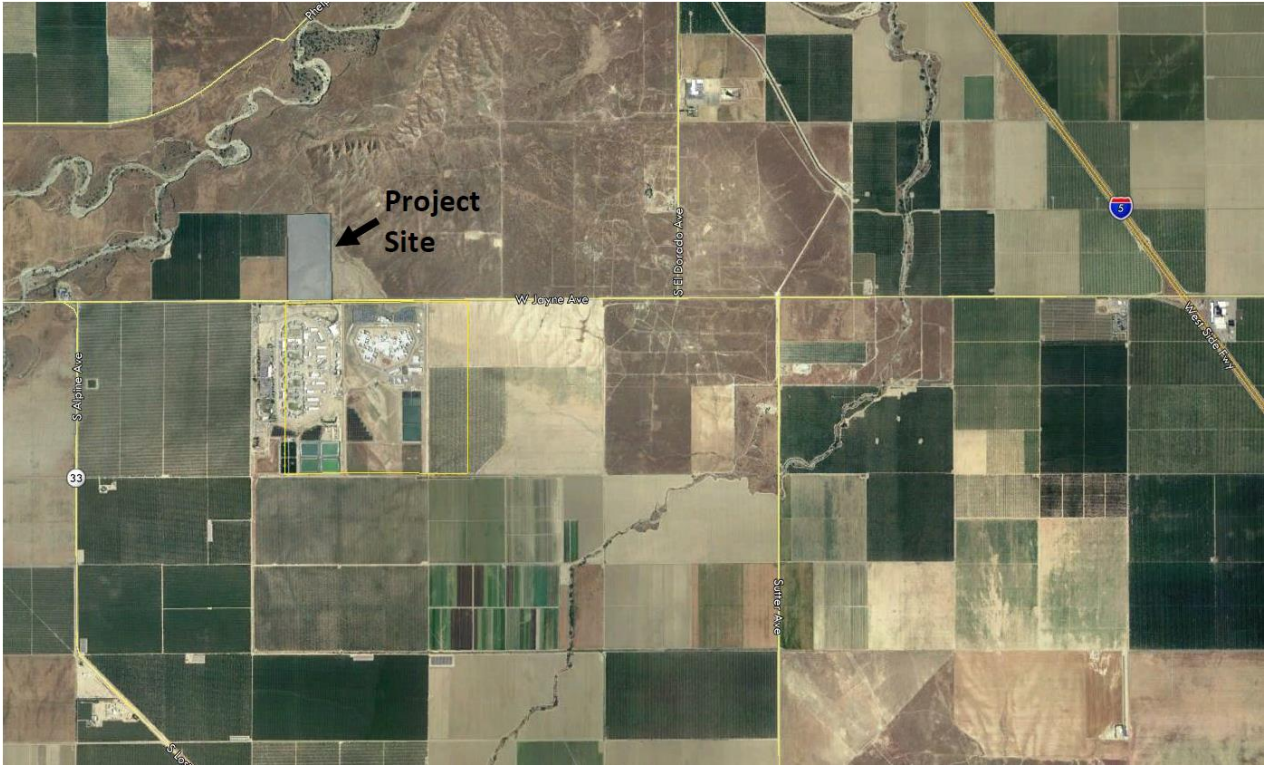


Figure 2. Site Aerial



Figure 3. Site Plan

