REFERENCING:

COUNTY OF RIVERSIDE -NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT & SCOPING MEETING

DATE: November 14, 2022

TO: Responsible and Trustee Agencies, Interested Organizations, and individuals

PROJECT CASE NO./TITLE: Easley Renewable Energy Project-Draft Environmental Impact Report Conditional Use Permit No. 220021/Development Agreement No. 2200016

LAKE TAMARISK DESERT RESORT AND SURROUNDING COMMUNITY FORMAL SOLAR SCOPING INPUT DOCUMENT (1/05/23)

Lake Tamarisk Desert Resort, Our Community, is a 55 years and older active Community Resort for Desert enjoyment including, birding, golfing, ATV, hiking, bike riding, swimming and other recreational activities. The Resort Community consists of 150 dwellings and recreational sites (most of which have 2 people) that are owned by its residents. The Community also includes 80 homes consisting of families with and without children. Approximately 60 school age children live in the community and attend a local school. There is a library, fire department and a post office, but no other services.

At this point, both the BLM and Riverside County have approved nearly 18,000 acres of large-scale solar in the area. About half has been built out and the other half under construction. The projects are:

Desert Sunlight Solar	4,400 acres
Desert Harvest Solar	1,200 acres
Athos Solar	3,400 acres
Palen Solar	3,000 acres
Acica Solar	2,000 acres
Victory Pass Solar	2,000 acres
Oberon Solar	2,700 acres

There are currently more proposed:

Easley Solar 3,500 acres

Sapphire Solar approximately 2,500 acres

There are an additional 130,000 acres, to the east of highway 177, in the focus area for Renewable Energy Development. The proposed Easley Solar Project panels would be at 750 feet from the nearest residence. The infrastructure is proposed to be at 25 feet from the nearest resident.

THE SOLAR PROJECTS HAVE CREATED THE FOLLOWING PROBLEMS AND ISSUES FOR THE COMMUNITY. WE WOULD LIKE THESE ITEMS ADDRESSED AND STUDIED IN DETAIL AND INCLUDED IN THE SCOPE OF THE ENVIRONMENTAL ASSESSMENT:

HEALTH EFFECTS

- According to the World Health Organization, there is a health risk of electromagnetic
 hypersensitivity associated with the solar inverter boxes and transmission lines that are
 present in the solar fields. Potential EMF effects are headaches, nausea, fatigue, skin
 rashes, dizziness, sleep disorders and possible connections to cancer. These effects can
 be felt by not only seniors but also children and other sensitive individuals.
- The solar farms, existing and proposed, have caused stress and anxiety that continues to
 escalate with our uncertain future. Stress and anxiety affect the senior community
 manifesting itself in decreased feelings of well-being, decline in physical and mental health
 and decreasing seniors' ability to perform daily routines.

JUSTIFICATION FOR A DETAILED STUDY:

To name a few stress factors Lake Tamarisk residents are currently experiencing are concerns about: Health effects which include silicosis, COPD, Valley Fever, allergies to name a few. The visual beauty of the Resort is diminishing and being replaced by industrial solar compounds. We no longer have the tranquility and peace in our community. The insecurity and frustration of not knowing our future of our community is contributing to our stress levels. The fear of severe reduction in property values and the necessity of relocation manifests itself in our declining health.

Referencing a BlueShieldCa.com article: "Stress is a significant contributor to declining health and well-being; it has even been identified as a primary cause of cardiovascular diseases, mental health disorders and the weakening of the immune systems. These conditions (and their impact) only worsen as people get older".

"According to the American Psychological Association, anxiety, depression, insomnia, indigestion, headaches, and increased risk of heart attack or stroke are all long-term effects of stress".

Dust and wind from cleared vegetation and ground disturbance carries silica
which can cause silicosis and other health issues. Blowing dust not only affects
those with COPD and other pulmonary issues but also can cause these issues in
healthy people and animals.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

Removal of stabilized soils and biological soil crust creates a destructive cycle of airborne particulates and erosion. As more stabilized soils are removed, blowing particulates remaining crusts, thus resulting in more airborne particulates.

"The composition of sand varies, depending on local sources and conditions, but the most common constituent of sand in inland continental settings and non-tropical coastal settings is Silica (Silicon Dioxide, or SIO2), usually in the form of Quartz". (Wikipedia, "Sand")

The U.S. Dept. of Labor, on the OSHA website, under the topic of "Safety and Health Topics: Silica" states: "Breathing in very small (respirable) crystalline silica particles, causes multiple diseases including, silicosis, an incurable lung disease that leads to disability and death. Respirable crystalline silica causes lung cancer, chronic obstructive pulmonary disease (C.O.P.D.) and kidney disease. Exposure to respirable crystalline silica is related to the development of auto immune disorders and cardiovascular impairment. These occupational diseases are life-altering and debilitating disorders that annually affect thousands of workers across the U.S."

OSHA has established standards to protect workers exposed to silica in the workplace. There is no protection addressed for non-occupational exposure to the community. There is no determination of the risk of Silica exposure, to the communities, that these solar projects are affecting.

There is a lot of history of "dropping the ball" in this country when it comes to protecting our citizenry from airborne problems. It has not been shown to anyone in this community to any degree of satisfaction that we are to be anything but collateral damage.

Fugitive Dust is a by-product of large solar projects being built in dry desert areas. As a
result of impacted desert soils, there have been very large fugitive dust disturbances since
the projects have been built out. This creates potential respiratory health issues and
increases risk of Valley Fever.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

Epidemiologists investigated an outbreak of valley fever that had sickened 28 workers at two large solar power construction sites in San Luis Obispo County, CA. ¹

¹ <u>28 solar workers sickened by valley fever in San Luis Obispo County - Los Angeles Times (latimes.com)</u>

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

Fugitive dust from the Oberon Solar farm one-half mile South of Lake Tamarisk after approved dust abatement procedures. (Taken December 11, 2022 at 9:30am during 16 mph southwest winds with gusts to 30 mph).



MITIGATION OF HEALTH IMPACTS DUE TO PROPOSED SOLAR INSTALLATION:

- A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR)
 and Community border, to the nearest solar installation infrastructure is necessary
 to minimize the health issues of fugitive dusts, silica, EMF and stress related health
 issue on an entire community.
- Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of Highway 177 for solar development while there is 130,000 acres available, east of Highway 177, in the focus area for renewable energy development.

AESTHETICS / VISUAL RESOURCES / REFLECTION

Our Unique Community, Lake Tamarisk, was chosen specifically by our residents because it is truly an Oasis in a vast open desert full of unique everchanging micro habitats for both plants and animals. The incredible 360-degree vistas of the Wilderness area including the mountains of Joshua Tree National Park, the peaks of the Chuckwalla Mountains, Coxcomb Mountains, Eagle Mountain, and the Palen Mountain areas are irreplaceable.

Existing large solar installations north, east, southeast and south affect our view of these
mountains. The incident of light reflecting from the panels is blinding and impacts the whole
Community.

JUSTIFICATION FOR A DETAILED STUDY:

The reflection from the Easley Project, which will be immediately bordering our property to the north, will greatly impact our view out our back door. Below is a picture, taken January 1, 2023, that shows a landscape scale solar installation, five miles out, due North of Lake Tamarisk Resort. The proposed Easley installation would encompass all the desert landscape between the existing solar installation and Lake Tamarisk Desert Resort; totally destroying our desert view.

- The individuals of our community, come here to enjoy and view the vast expansion of the living desert. The life style we came here to enjoy is being taken from us without even consulting us.
- Dark Skies will be affected by the external lighting. This is one of the few areas in the US with Dark Sky.
- Easley Solar Installation would be seen from our homes at Lake Tamarisk Desert Resort.
 Visually, our desert of past is now filling up with solar panels. There is no way to hide such a big land disturbance.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

The Bureau of Land Management has created several near-by Areas of Critical Environmental Concern and National Conservation Areas regionally in association with the establishment of the Desert Renewable Energy Conservation Plan in 2016. These areas are managed under a higher Visual Resource Management Class (VRM Class)² and are adjacent to proposed and existing solar projects. The projects average about 3 to 5 square miles per project and create a very large visual contrast to private property and adjacent conservation areas.

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² Bureau of Land Management Visual Resource Management Classes (anl.gov)

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY CONTINUED:

"DCAP 2.3 Assure that the design of new land uses subject to discretionary review visually enhances, and does not degrade, the character of the Desert Center region". Excerpt from County of Riverside General Plan, September 28, 2021.

"In certain respects, Desert Center is a sort of gateway into the entire region along this major artery spanning the nation. It triggers a change in the prevailing pattern of the landscape whether leaving the urbanizing portions of the region or approaching them from the east. At a very minimum, it is for many a welcome oasis as they cross the desert. For a much smaller number of residents and business operators, it is a small world of tranquil reality, with clean air, and little traffic and noise, that sets it apart from every other part of Riverside County. The Desert Center Area Plan contains policies that guide the physical development and land uses in this oasis in the unincorporated portion of eastern Riverside County." (Excerpt from County of Riverside General Plan, September 28, 2021).

The above quoted excerpts state what should happen at the Desert Center area. Specifically, we at Lake Tamarisk Desert Resort, have not seen any protection of our immediately surrounding area from the Riverside County General Plan dated September 28, 2021.

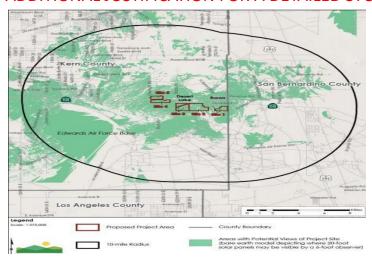
"The uninhabited and natural character of the open space lands is expected to continue throughout the life of the plan." (Excerpt from County of Riverside General Plan dated September 28, 2021).

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

The below picture represents the view looking north towards an existing solar landscape scale installation five miles from Lake Tamarisk border. The proposed Easley project would encompass and destroy the entire desert view from Lake Tamarisk Desert Resort to the existing solar facility. Picture taken January 1, 2023.



ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:



^ A Visual Impact analysis map was made for the EIR for the Arietian Solar Project near Boron, CA. A similar map should be made for Easley Solar Project.

MITIGATION OF AESTHETICS/VISUAL RESOURCES/REFLECTION DUE TO PROPOSED SOLAR INSTALLATION:

- A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to maintain the integrity and lifestyle of LTDR and Community.
- At these distances, where necessary to block the view of the solar panels, berms with mature native plantings and maintenance thereof is necessary.
- Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there

is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

POPULATION AND HOUSING AND SOCIOECONOMICS

- Lake Tamarisk Desert Resort, Our Community, is a 55 years and older active Community Resort for Desert enjoyment. The Resort Community consists of 150 dwellings and recreational sites (most of which have 2 people) that are owned by its residents. The Community also includes 80 homes consisting of families with and without children. Approximately 60 school age children live in the community and attend a local school. There is a library, fire department and a post office, but no other services. The demographics of Lake Tamarisk is primarily active senior citizens.
- Lake Tamarisk Community is currently surrounded on 2 sides with vast solar arrays and with the proposed Easley Solar Project, we would be closely surrounded on 3 sides. The remaining side, to the west, contains high voltage lines and their towers. The identity of Lake Tamarisk Desert Resort and Community, in a vast living desert, will be lost.
- Quality of life would be severely diminished for all residents and visitors who come to the desert for the beauty and recreation.
- We are extremely concerned with the value of our properties and our desired way of life.
 Currently, properties are going up for sale due to the concerns and uncertainty of the multiple impacts of current solar fields and proposed solar fields that surround Lake Tamarisk Desert Resort. Our concern is that our property will inevitably be less desirable and thereby lose its value.
- Higher local temperatures will result in higher power bills and less outdoor opportunities.

JUSTIFICATION FOR A DETAILED STUDY:

An in-depth study needs to be done, going back ten years, on kilowatt usage year around home by home at Lake Tamarisk Desert Resort and Community as compared to the kilowatt usage that would be required to cool homes with the rise in temperature ranging from 3 degrees to 10 degrees going forward at least 10 years.

MITIGATION OF IMPACTS ON POPULATION AND HOUSING AND SOCIOECONOMICS DUE TO PROPOSED SOLAR INSTALLATION:

- A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to maintain the integrity and lifestyle of LTDR and Community.
- Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there

is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

AIR QUALITY

• Construction dust and wind that has been increased from vegetation removal, carries silica and herbicides. We are specifically concerned with the impact on our young and elderly.

JUSTIFICATION FOR A DETAILED STUDY:

Large-scale solar projects in the hot desert cause air quality problems. Dust control in hot, arid climates is very problematic. The removal of established vegetation, biological soil crusts and centuries old desert pavement creates opportunities for dust to be airborne every time the wind blows. Not only does fugitive dust create problems for visual and biological resources, it creates issues for public health as well. Efforts to mitigate fugitive dust on large desert regions often fall short.

• Valley Fever risk will be increased. (refer to Health section)

MITIGATION OF IMPACTS ON AIR QUALITY DUE TO PROPOSED SOLAR INSTALLATION:

- A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary minimize the health issues of fugitive dusts and silica.
- Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

BIOLOGICAL RESOURCES

• To our immediate north, protected Desert Wash Woodlands are unique and this area has very old desert ironweed trees; some may be as much as 800-years-old. The Desert Wash Woodlands will be destroyed as solar encroaches.

JUSTIFICATION FOR A DETAILED STUDY:

The Desert Wash Woodlands due north of Lake Tamarisk Desert Resort, within the proposed Easley Solar project, lie running east and west throughout the desert in a finger fashion. These washes are critical habitat survival for many plants and animals. An article published in 2000 by The Arizona-Sonora Desert Museum states that Ironwood is a keystone species and nurse plant. Ironwood provides essential shade to more than 500 species of plants and animals in the Sonora Desert.

- A vast amount of flora and fauna in this desert needs protection to preserve the desert for our current enjoyment and for future generations of residents and visitors. This would maintain our identity as a resort in an Oasis in the Desert.
- The conversion of so much land to solar panels removes the habitat for much of the local wildlife and plants. These species include, desert tortoise, burrowing owl, burro deer, kit fox, American badger, desert bighorn sheep and a host of other wildlife species.
- Lake Tamarisk is in the Colorado River Flyway which is part of the Pacific Flyway. We
 have about 300,000 birds that migrate through our flyway. Specifically, 304 species have
 been observed and reported in and around Lake Tamarisk;
 eBird, Cornell University.
- Research shows these migrating birds have been affected by solar arrays and EMFs from transmission lines and inverter boxes. Solar projects mimic lakes and have caused significant water fowl mortality.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

It is thought that the projects mimic water and cause birds to hit the solar panels. Data from 7 solar projects in California has revealed 3,545 bird kills from 183 species from 2012 to 2016. This can be referenced from the 2016 Multi-Agency Avian Solar Working Group conference from 2016³.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

A Federally Endangered Yuma Clapper Rail was killed on the Desert Sunlight Solar Project in 2015.

Black and Veatch (www.bv.com) reports that large solar fields such as those that have been built in the last several years in southern California and the desert Southwest can fool birds into changing flight direction, sometimes during migration, to approach them because they appear to be lakes from a distance. Many of the birds that have been killed at these large solar sites are waterbirds, which indicates that these birds fly to solar fields and realize too late in their descent that the solar panels are not water. The waterbirds then collide with the solar panels and are critically wounded or killed. Some waterbirds also have great difficulty taking off from non-water surfaces, which could leave them stranded in desert areas without food, water or shelter.

³ <u>Developing Nesting Habitat Suitability Model for Greater Sage-Grouse Conservation in Wyoming Using Object-based Image Analysis (anl.gov)</u>



MITIGATION OF IMPACTS ON BIOLOGICAL RESOURCES DUE TO PROPOSED SOLAR INSTALLATION:

- A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary minimize the impacts on biological resources.
- Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

GEOLOGY AND SOILS

- Desert Wash Woodlands, containing Ironwood, will be more impacted by flash floods causing undetermined changes in erosion and can be destroyed due to disruption, by the solar fields, of the natural flow of the water.
- We are currently experiencing termite swarms and more sightings of rattlesnakes due to nearby soil disturbance from the solar fields and the vibration of all the construction equipment. The use of the PD10 equipment that pounds the ground is of particular concern to insects and other animals.
- Concern about soil sterilization with the use of chemicals.
- Carbon sequestration of intact, undisturbed desert soils and vegetation should be considered in this review.

JUSTIFICATION FOR A DETAILED STUDY:

Carbon sequestration of intact, undisturbed desert soils and vegetation should be considered in this review. CO2 as it is inhaled above ground and exhaled below ground and stored in a biological web of mycorrhizae is seldom if ever accounted for by environmental reviews of large-scale solar projects built on healthy, functioning desert ecosystems. This process of photosynthesis and respiration is as old as plant life systems.4 The layered caliche underground at shallow depths in deserts is fossilized carbon. Cemented caliche (calcium carbonate) soils are common and widespread in the Mojave Desert, including on solar project sites. In 2011 Dr. Michael Allen, Professor of Biology, and Plant Pathology and Microbiology, University of California at Riverside, put out a white paper on the research needs in desert ecology raised in the face of large-scale renewable energy development. 5 These research needs include more studies in how climate change will shift species and habitats; sources and recharge of groundwater pumped by solar projects; persistence of rare species; invasive plants; and Carbon sequestration in desert vegetation and soils. All these areas have many unknowns, and more research still needs to be undertaken before land managers make sweeping decisions that will alter thousands of acres of desert ecosystems and hydrology for decades to come. Microphyll woodlands in the desert, for example, are a prime driver of carbon sequestration according to Allen "Many of the areas that are proposed to be developed for the solar development include Microphyll woodlands. The dominant plants (legume trees) have deep roots capable of reaching groundwater (several meters). When desert plants grow, they absorb carbon dioxide. The carbon (C), as sugars, moves into roots and soil organisms. Carbon dioxide is respired back into the soil, part of which reacts with calcium (Ca) in the soil to form calcium carbonate. This is how our deserts sequester large amounts of C and thus function to reduce atmospheric CO2. The magnitude of this carbon storage process is still a crucial research question and remains unknown for our California deserts. However, values of up to 100g/m2/y of C-fixation are reported from deserts in Baja and Nevada (Serrano-Ortiz et.al. 2010). After vegetation is removed to make way for solar arrays, carbon dioxide will be left to return to the atmosphere that ordinarily would have been used to form soil organic matter buried up to several meters deep, or released by roots and soil microbes as soil CO2, which in turn, binds with soil Ca to form caliche. Our deserts have large amounts of CO2, stored as caliche (CaCO3). The amount of C in caliche, when accounted globally, may be equal to the entire C as CO2 in the atmosphere." 6

⁴ Robin Kobaly, The Desert Under Our Feet – An extraordinary Biological Web that Serves Us in Countless Ways Desert Report, March 2019, synthesizes 29 scientific peer reviewed journal articles focused on carbon sequestration in desert soils ⁵ http://basinandrangewatch.org/Michael%20Allen%20paper%20copy.pdf

⁶ https://www.scribd.com/document/50559956/Solar-Power-in-the-Desert-Michael-Allen

MITIGATION OF IMPACTS ON GEOLOGY AND SOILS DUE TO PROPOSED SOLAR INSTALLATION:

- A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary minimize the impacts on geology and soils.
- Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

HAZARDS AND HAZARDOUS MATERIALS

- Chemical sprays will be used to control vegetation and invasive weeds.
- Solar panels contain dangerous chemicals that could be released if broken or damaged by hail storms, high winds and blowing gravel.
- Desert sand, disturbed by solar construction, is very high in silica, which can cause Silicosis.

MITIGATION OF IMPACTS ON HAZARDS AND HAZARDOUS MATERIALS DUE TO PROPOSED SOLAR INSTALLATION:

- A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to minimize the health issues of fugitive dusts and silica due to hazards and hazardous materials
- Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

HYDROLOGY AND WATER QUALITY

- Configuration of solar panels can alter surface hydrology and create local flooding during rain events and monsoon season.
- Individual solar projects, such as Easley, will require over 1,000-acre feet of water for construction and dust mitigation. Tens of thousands of additional acre feet will be needed for all of the energy infrastructure built and planned for the area.

 The local Chuckwalla Aquifer is a critical need for our community and is already being depleted. The Proposed Eagle Crest Pumped Storage Project would have a cumulative impact on the aquifer depletion.

JUSTIFICATION FOR A DETAILED STUDY:

Referencing the 2017 NEPA Review for the Eagle Crest Pumped Storage project from the BLM:

"An updated assessment of cumulative groundwater effects in the Chuckwalla Basin was performed accounting for a current list of projects and estimated water demands, and review of FERC required groundwater and water quality protection plans. At the time the FERC EIS was published in 2012, an estimated 14 solar projects were planned with total cumulative water use estimates of about 17,742 acre-feet for construction plus 2,506 acre-feet per year during operation. Since that time, many of the originally proposed solar projects have been withdrawn from consideration. Water usage estimates are also lower due to the cancellation of the Eagle Mountain landfill project and an updated schedule for the implementation of the FERC Project's timing. A revised water balance was developed based on these changes in water use. The balance considers the timing of water use by projects and calculates the cumulative change in aquifer storage. The revised estimate indicates that outflows will exceed inflows from the start of the initial fill in 2020 until 2042 with a maximum reduction in aquifer storage of about 4,200 acre feet and will recover to pre-FERC Project conditions by 2046. Total cumulative water usage estimates are about 114,560 acre-feet lower than previously published."

Since the above study is outdated, there are actually more solar project proposed. We request a new detailed analysis on these projects.

Environmental Assessment and Proposed Plan Amendment April 2017.pdf (blm.gov) Section 1.6-,

- A well level depth study must be done covering several decades.
- An in-depth study of the quality and mineralization of water due to aquifer overdraft is essential.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY:

Renewable Energy Impacts on Ground Water in a Desert Basin

Noel Ludwig, U.S. Forest Service
Rocky Mountain Regional Office
noel.ludwig@usda.gov
Peter Godfrey, Bureau of Land Management
Arizona State Office
pgodfrey@blm.gov
Arizona Hydrological Society 2021 Annual Symposium
September 15^{to} through 17th, Tempe, Arizona

The above presentation was made to the public during the 2021 annual conference of the Arizona Hydrological society. The content of the presentation caught my eye as an owner of two lots at Lake Tamarisk Resort near Desert Center, CA. (Kent Madison, Managing member of 3RValve LLC). This small resort community sits at the upper end of the Chuckwalla Valley in East Riverside County CA. The community's only water source is ground water with a carbon date of over 15,000 years and a declining static level. The basin has been over drawn from the time that the first well was drilled in the early 1950's. All the succeeding wells that have been developed have continued to increase the aquifer decline. During the mid-1980's when increased agriculture pumping was taking place, the decline was over 160 feet. This was well beyond what the natural aquifer recharge rate is and these wells and other in the area have never recovered back to their natural level.

The report also was coauthored by Peter Godfrey <u>Hydrologist / Project Manager Jan 2010 - Jan 2015 · 5 yrs 1 mo California Desert District, Moreno Valley, CA • Project management of renewable</u>

energy projects through the Federal NEPA process for the California Desert District's Renewable Energy Coordination Office (RECO).

- BLM Project Manager through publication of a Draft EIS for the Haiwee Geothermal Leasing Area, including a proposed amendment to the California Desert Conservation Area Plan.
- BLM Hydrologist for the interdisciplinary team on the programmatic Desert Renewable Energy Conservation Plan authorized September 14, 2016.
- District Coordinator / POC for the West Chocolate Mountains Renewable Energy Evaluation Area and CDCA Plan Amendment through the Record of Decision.
- Contract Officer's Representative.
- RECO team hydrologist for solar, wind, and geothermal energy.
- Advocate for water resources on BLM lands in the California Desert District.
- Oversight and coordination of personnel.
- Active involvement with Section 106 of the NHPA.
- Address pertinent issues, laws, and regulations as applied to Federal actions.

- Address diverse resources including recreation, grazing, wilderness, biological, air, water, and climate.
- Technical reviews of NEPA and other documents.
- Point of Contact for the California Desert District Minerals Program with associated duties from 2012 to 2015.

As you can see from Peters work from 2010 to 2015, he is very knowledgeable of the desert environment and the impacts that increased water withdrawals will have on the local native ground water supplies.

The report continues to state that the average exceedance of water removed from the aquifer from several different models taken over the years shows a mean average of 1,072-acre feet of greater withdrawals than nature's ability to recharge the aquifer. This study also predicts that the future withdrawals will likely be twice that number as more solar projects are built in the basin.

So, the real takeaway from the report is there is a problem of groundwater declines in the Chuckwalla basin and it is only going to get worse if the trend is not stopped and reversed.

MITIGATION OF IMPACTS ON HYDROLOGY AND WATER QUALITY DUE TO PROPOSED SOLAR ISTALLATIONS:

We know that the State

and Nation want solar energy as a renewable power source and they see the Southwest as a major player in meeting the demand.

If society and industry is determined to place solar in the Chuckwalla valley then they should also be willing to solve the ground water supply problem.

Luckily the solution to the ground water problem is present in the upper end of the basin in the form of the Colorado River aqueduct or CRA. This 242-mile-long canal is operated by the Metropolitan Water District of Southern California and flows year-round transferring Colorado River water at a flow rate of 1,600 cubic feet per second. It supplies approximately 1.2-million-acre feet of water per year to Southern California. The district serves over 17.5 million people. To replace the entire loss of groundwater from the Chuckwalla basin due to past, current and future demands of over 2,200-acre feet, the area could divert 5 cubic feet of the 1,600 cubic feet per second flow from the canal to a shallow infiltration basin. This diversion of 5 cubic feet works out to be approximately 12 ounces per person in the water district. This could be done by a simple pipe discharge from the canal under the road at the current sand removal station located just before the Eagle Mountain pump station pipe intake located just Northeast of Eagle Mountain Mine. The capital cost would be next to nothing and the benefits to the Chuckwalla basin and the surrounding areas would be

forever. A detailed study needs to occur to fix our past and future problem before they become too big to solve.

LOCAL CLIMATE EFFECTS:

An increase in temperature occurs from the large solar farms could be from 3 to 13 degrees.
 This has a great impact on not only the people in the community but also the animals and flora and fauna.

Higher living expenses will occur with the increased temperature from air conditioning and dust abatement.

JUSTIFICATION FOR A DETAILED STUDY:

January 30, 2022 Article in Physics World magazine by Michael Allen states that is an increase of 3 to 7 degrees due to large solar farms. Consider the fact that we're located in the center of a shallow bowl with mountains surrounding nearly 280 degrees of our perimeter, holding in the heat. At this time the Easley Solar Project has proposed the first solar panels to be located 750 feet from our border.

The proposed project would cover the light sandy ground with dark panels, the average daily ambient temperatures are guaranteed to increase based on the simple laws of physics. Whenever winds are calm, the mountains surrounding this area will hold that heat in our valley and extend the temperature on those hot midsummer days, now already reaching 124F+. Other sources indicate temperatures could increase as high as 13 degrees.

ADDITIONAL JUSTIFICATION FOR A DETAILED STUDY

GreenBiz Article, by Zhengyao Lu and Benjamin Smith dated March 25, 2021 states "while the black surfaces of solar panels absorb most of the sunlight that reaches them, only a fraction (around 15 percent) of that incoming energy gets converted to electricity. The rest is returned to the environment as heat."

• The effects of solar farms contributing to tornado events should be studied.

MITIGATION ON IMPACTS ON LOCAL CLIMATE EFFECTS DUE TO PROPOSED SOLAR INSTALLATION:

• A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to minimize the local increase in temperature.

- Provide AC units and maintenance due to the increased usage of power to all inhabitants of LTDR and Community.
- Provide electrical credits in the form of payments, significant cost reduction on KW hour usage.
- Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

LAND USE AND PLANNING

- Our sewage settlement ponds are inside the perimeter of the proposed solar project as shown on site maps.
- The Area of Critical Environmental Concern (ACEC) that lies west of Kaiser Road and adjacent to Lake Tamarisk Desert Resort and Community is currently preserved and needs to remain protected. The BLM is currently changing land use designation, for this area, to allow for greater expansion of Landscape Scale Solar fields.

MITIGATION OF IMPACTS ON LAND USE AND PLANNING DUE TO PROPOSED SOLAR INSTALLATION:

 The sewage settlement pond land needs to be assigned to Riverside County in care of CSA 51.

CULTURAL RESOURCES/ARCHEOLOGY

- Solar projects destroy prehistoric artifacts. The Genesis Solar Project on Ford Dry Lake destroyed an entire archeological village and burial site. The viewsheds in the area are considered "Cultural Landscapes" by local tribes.
- Many people in our community are second and third generation families that carry on traditions including and respecting the historical area where General Patton trained one million troops for WWII. There remain many artifact and tank tracks in the area. Numerous foundations from Patton's training grounds remain visible in the area and should stay that way. This area is of historical significance.

MITIGATION OF IMPACTS ON CULTURAL RESOURCES/ARCHEOLOGY DUE TO PROPOSED SOLAR INSTALLATION:

- A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary
- to minimize the disruption of this area of historical significance.

 Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

NOISE

- The noise during construction is a concern. It causes stress which has an adverse effect on our quality of life. As a result of the solar facilities construction noise, our local property values and future growth of our community is in jeopardy.
- The removal of vegetation to the north, due to the proposed Easley Project, would dramatically increase the noise levels in the Lake Tamarisk Community from Chuckwalla Valley Raceway and Highway 177. This will be an on-going effect. The existing Oberon Project, to our south, now reflects the I-10 freeway noise to our resort.
- The continuous humming from the inverter boxes and battery storage air conditioning is not only annoying but also stressful; affecting our quality of life.

MITIGATION OF IMPACTS ON NOISE DUE TO PROPOSED SOLAR INSTALLATION:

- A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to minimize the noise and disruption to LTDR and Community.
- Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

PUBLIC SERVICE AND UTILITIES/SERVICE SYSTEMS

- Fire concerns are increased by the power grid creating a need for a better water system to protect our homes.
- Our water pumping system cannot handle construction water usage and can't fight wind driven fires. The solar projects are using our equipment to pump water into their trucks and frack tanks.

JUSTIFICATION FOR DETAILED STUDY:

Riverside County CFO Andrew Ruiz met Fire Personnel at Desert Center a few months ago to test our water system for the planned Fire Station, and the system failed. It could be resolved by replacing some pumps. December 2022.

Additionally, if the power goes out there is no battery backup for our water supply.

MITIGATION OF IMPACTS ON PUBLIC SERVICE AND UTILITIES/SERVICE SYSTEMS TO PROPOSED SOLAR INSTALLATION:

• Due to the extensive use of water by the Solar Construction, Replacement of pumps, water infrastructure, piping, hydrant upgrade is essential. The above ground gravity feed reservoir is necessary for fire suppression and human consumption in the event of power outage.

RECREATION

- The installation of solar farms has created a reduction in the access to off road vehicle designated trails and public lands for recreation and viewing.
- The Community has a large investment in equipment for ATV excursion, biking, bird watching, exploring flora and fauna and other recreational pleasures.
 This has an adverse effect on our quality of life and property values due to the decreased access to the desert trails.

JUSTIFICATION FOR A DETAILED STUDY:



^Palen Solar Project east of Desert Center. This entire public road was cut off for the project.

MITIGATION OF IMPACTS ON RECREATION USES DUE TO PROPOSED SOLAR INSTALLATION:

- A five-mile Natural Desert Zone Buffer from Lake Tamarisk Desert Resort (LTDR) and Community border, to the nearest solar installation infrastructure is necessary to maintain our recreational uses on designated trails and areas in and around LTDR and Community.
- Relocate the Easley Solar Project east of Highway 177. There only remains approximately 6,000 acres west of highway 177 for solar development while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

TRAFFIC AND TRANSPORTATION

- The ongoing dust and noise from trucks affects our quality of life.
- The speed and quantity of large vehicles on Oasis Road, Highway 177 and Kaiser Road, during construction, endangers bikers, hikers and ATV users of all ages (children and seniors.)
- School age children catching the bus are at risk.

WILDFIRE

- Transmission lines increase wildfire risk. Disturbance of so much habitat will proliferate the spread of invasive weeds which can carry wildfires.
- The Community's pumps and systems are aging and with the added use by the Solar, will need replacement. They are barely adequate for our community needs, but definitely inadequate for use in fighting wind driven wildfires and home fires.

MITIGATION OF IMPACTS ON WILDFIRE POTENTIAL TO PROPOSED SOLAR INSTALLATION:

 Due to the extensive use of water by the Solar Construction, Replacement of pumps, water infrastructure, piping, hydrant upgrade is essential. The above ground gravity feed reservoir is necessary for fire suppression in the event of power outage.

IN SUMMARY:

Lake Tamarisk is our home and refuge that we have chosen for its unique and beautiful Desert location. Our quality of life is being threatened. We came, to live at an oasis in a Desert Wilderness full of life and natural beauty, not to live on an island in a dead solar sea surrounded by barbed wire fences.

Any development within the five-mile natural desert buffer necessary, will impact our personal, economic, physical and mental well-being. There has not been any community wide human consideration, especially with the senior resort, within the scope of any environmental study or the original EIS from the 2016 DRECP.

Taxes collected from the Easley Solar Project and paid to Riverside County should be earmarked for CSA 51 improvements to the entire community and infrastructure.

The residents of Lake Tamarisk and Community do not want to be sacrificed for the benefit of reaching a national renewable energy goal. The reality of the total electrical production from solar farms of the two potential projects west of Highway 177, which include Easley and Sapphire, total less than 1000 megawatts out of over 20 gigawatts already slated to be developed in the region, an infinitesimal amount.

Relocation of the Easley Solar Project to the east of Highway 177 is reasonable because there only remains 6,000 acres west of highway 177 for solar development; while there is 130,000 acres available east of highway 177 in the focus area for renewable energy development.

In our opinion the magnitude of this project should require evaluation through Individual Environmental Impact Statement.

ADDENDUM: PICTURES AND ALTERNATIVE

These photos represent the negative impacts of solar farms.

PHOTOS:

Represents Athos Solar fencing in close proximity to house.



Photo courtesy of Kevin Fitzgerald, CV Independent

Athos Solar Fencing in close proximity to Green Acres Park



Photo courtesy of Kevin Fitzgerald, CV Independent.

Transmission lines on Kaiser Road



Photo courtesy of Kevin Fitzgerald, CV Independent After dust abatement

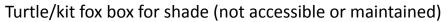


Photo courtesy of Kevin Fitzgerald, CV Independent

Photo due south of Lake Tamarisk Desert Resort with 5 miles north of the First Solar Plant and Oberon



Photo courtesy of Kevin Fitzgerald, CV Independent





Courtesy of Teresa Pierce December of 2022

Ironwood that is protected shown piled up for chipping. Taken from Oberson Project

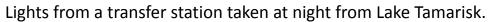


Courtesy of Teresa Pierce December 2022

Oberon Solar land cleared for construction. This is where dust comes from.



Courtesy of Teresa Pierce December 2022





Courtesy of Teresa Pierce December 2022

A view of Athos Solar prison style fencing next to a residence



Courtesy of Teresa Pierce December 2022

ALTERNATIVES:

A no large-scale energy alternative can be justified with the California Energy Efficiency Strategic Plan (CEESP) ⁷. This plan already exists as California state law and it can be fully implemented now. This is a state plan that prioritizes implementing rooftop solar and energy efficiency prior to developing largescale, remote solar and wind projects. The Draft EIS should also include and analyze an alternative that maximizes wildlife protection by avoiding, minimizing, and fully mitigating all direct, indirect, and cumulative impacts to wildlife and wildlife habitat to at least a no-net loss standard.

The need for this project is questionable, as it adds a large cumulative impact to grid congestion in California. The state is currently experiencing a worsening glut of solar power at peak times on the transmission grid system, as measured by the California Independent System Operator. This has been shown as the Duck Curve, where renewable energy generation exceeds demand in the middle of the day, then causes the need to ramp up generation at the end of the day after the sun sets with inefficient natural gas peaker plants. At times, as much as 13,000 MW is needed in 3 hours in the evening hours, as solar projects go offline at night.

Would the battery facility need to be cooled? How much energy would be required to do so? This is a hot desert with summer temperatures reaching 124 degrees F at times. How will this heat affect battery efficiency? Will air-conditioning be used to cool battery bank buildings? How much electricity for air-conditioning will be parasitized off the grid? Or will liquid-cooling containers be used for batteries? All eyes will be watching to track the efficiency loss of battery storage in hot desert lowlands, compared with coastal urban load center alternatives. To conserve habitat, the BLM should consider a No Action Alternative based on local small scale distributed battery technology in urban centers. Battery storage is making advances for smaller scale solar energy and would not require such a large facility that would need cooling. Batteries will create a waste/recycling issue as well and the BLM should be asking if batteries will be recycled.

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⁷ Energy Efficiency Strategic Plan (ca.gov)

Teresa Pierce Mark Carrington Don Sneddon Jerry Grey Vicki Bucklin Sharon Dilley

CONTRIBUTORS:

Skip Pierce Kent Madison, 3R Valve LLC Kevin Emmerich, Co-Founder Basin and Range Watch Kevin Fitzgerald, CV Independent News Bob Mitchell

Link to CV Independent News Article by Kevin Fitzgerald

https://cvindependent.com/2022/12/oasis-no-more-residents-of-lake-tamarisk-and-desert-center-worry-about-the-proliferation-of-utility-scale-solar-installations/

SUPPORTERS FROM LAKE TAMARISK DESERT RESORT AND COMMUNITY IN OPPOSITION TO THE EASLEY SOLAR PROJECT

Page 1 Sign In Form Peti	tion For	SOLAR CONCERN	
-		Date: Dec. 3, 27	22
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