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July 18, 2023

Mr. Adrian Moreno Associate Planner Development Services Department City of Coachella 1515 6th Street Coachella, CA 92236

SUBJECT: Armtec Defense Products Project in Coachella, CA (AR No. 23-10)

Dear Mr. Moreno:

On July 3, 2023, the Imperial Irrigation District received from the City of Coachella Development Services Department, a request for agency comments on the Armtec Defense Products project (Architectural Review No. 23-10). The applicant, BayWa r.e. Power Solutions, proposes the installation of seven (7) solar energy generation canopies generating a total of 486 kWp and one (1) ground-mounted solar grid with an output of 604.8 kWp at 85901 53<sup>rd</sup> Avenue in Coachella, CA; APNs 778-390-008 and 778-420-013, respectively. The areas for the solar canopies range from 2,581 to 4,163 sq. ft. and the ground-mounted solar grid totals 31,081 sq. ft.

IID has reviewed the project information has the following comments:

- A detailed impact study will be developed once the applicant submits an interconnection application (available at <u>https://www.iid.com/energy/rooftop-solar/interconnection</u>). This information will allow IID to perform an accurate assessment of any potential impacts and required mitigations.
- 2. Related inquiries and completed applications may be sent to <u>solar@iid.com</u> to start the review process.
- Underground infrastructure that includes trenching, conduits, pull boxes, switch boxes and pads should be installed following IID approved plans. Physical field installation of underground infrastructures should be verified and approved by an IID inspector prior to cable installation as per IID Developer's Guide (available at the district website <u>https://www.iid.com/home/showdocument?id=14229</u>).
- 4. Any line extensions and/or additions, reconfigurations or other mitigation measures required to connect the project to the IID grid, will be made in accordance with IID Regulations:
  - No. 2 (http://www.iid.com/home/showdocument?id=2540)
  - No. 13 (http://www.iid.com/home/showdocument?id=2553),
  - No. 15 (http://www.iid.com/home/showdocument?id=2555),
  - No. 20 (http://www.iid.com/home/showdocument?id=2560) and

No. 23 (https://www.iid.com/home/showdocument?id=17897).

- 5. For additional information regarding electrical service for the project, the applicant should be advised to contact the IID Energy La Quinta Division Customer Operations, 81-600 Avenue 58 La Quinta, CA 92253, at (760) 398-5841 and speak with the project development planner assigned to the area.
- 6. It is important to note that IID's policy is to extend its electrical facilities only to those project that have obtained the approval of a city or county planning commission and such other governmental authority or decision-making body having jurisdiction over said developments.
- 7. The applicant will be required to provide rights-of-way and easements for power line extensions and/or any other infrastructure needed to serve the project.
- 8. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at <a href="https://www.iid.com/about-iid/department-directory/real-estate">https://www.iid.com/about-iid/department-directory/real-estate</a>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
- 9. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and/or distribution lines, ancillary facilities associated with the conveyance of energy service; the acquisition and dedication of real property, rights of way and/or easements for the siting and construction of electrical utility substations, electrical transmission and/or distribution lines and ancillary facilities associated with the conveyance of energy service, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities are fully mitigated. Any mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.
- 10. Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or

Adrian Moreno July 18, 2023 Page 3

a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. The State CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. CEQA case law has established general principles on project segmentation for different project types. For a project requiring construction of offsite infrastructure, the offsite infrastructure must be included in the project description. San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App. 4th 713.

11. Applicant should be advised that landscaping can be dangerous if items are planted too close to IID's electrical equipment. In the event of an outage, or equipment failure, it is vital that IID personnel have immediate and safe access to its equipment to make the needed repairs. For public safety, and that of the electrical workers, it is important to adhere to standards that limit landscaping around electrical facilities. IID landscaping guidelines are available at <a href="https://www.iid.com/energy/vegetation-management">https://www.iid.com/energy/vegetation-management</a>.

Should you have any questions, please do not hesitate to contact me at (760) 482-3609 or at <u>dvargas@iid.com</u>. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargás Compliance Administrator II

Sergio Quiroz – Interim General Manager Mike Pacheco – Manager, Water Dept. Jamie Asbury – Manager, Energy Dept. Matthew H Smelser – Deputy Mgr. Energy Dept. Daryl Buckley – Mgr. of Distribution Srvcs. & Maint. Oprtns., Energy Dept. Geoff Holbrook - General Counsel Michael P. Kemp – Superintendent General, Fleet Services and Reg. & Environ. Compliance Laura Cervantes. – Supervisor, Real Estate

From:	Vega, Jaqueline <javega@rivco.org></javega@rivco.org>
Sent:	July 26 23 1:34 PM
То:	Adrian Moreno
Subject:	RE: RAC - AR No. 23-10: Armtec Defense Technologies

Hello,

The project is located in zone D of Jackie Cochran airport influence area. Please note that review by ALUC is not directly required because the City of Coachella can review non-legislative projects .

Additionally, please note that ALUC review for solar is only required for zones C or higher, zone D does not require solar review.

Should you have any questions, please contact me.

Jackie Vega Urban Regional Planner II



Riverside County Airport Land Use Commission 4080 Lemon Street, 14 Floor Riverside, Ca 92501 (951) 955-0982 Javega@RIVCO.ORG www.rcaluc.org

From: Adrian Moreno <<u>amoreno@coachella.org</u>> Sent: Wednesday, July 26, 2023 10:13 AM To: Vega, Jaqueline <<u>JaVega@RIVCO.ORG</u>> Subject: FW: RAC - AR No. 23-10: Armtec Defense Technologies

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Hello Jackie,

Would you be able to provide comment for this project this week? Sorry for the short notice.

For your review, please find the attached Request for Agency Comments for the Architectural Review (AR) No. 23-10: Armtec Defense Technologies project.

The project is for (7) solar canopies in the parking lot totaling 486 kWp at 85901 53th Avenue (APN 778-390-008), and (1) Ground-mount solar grid totaling 604.8 kWp at the vacant lot at APN 778-420-013. Enclosed is the site plan for the (7) solar canopies that range from 2,581 SF – 4,163 SF, and for the (1) Ground-mount solar grid totaling 31,081 SF.

Thanks, Adrian Moreno Associate Planner | City of Coachella 53390 Enterprise Way Coachella CA, 92236

### Office: 760-398-3502

From: Adrian Moreno

Sent: July 17 23 11:01 AM

To: Andrew Simmons <asimmons@coachella.org>; Castulo Estrada <cestrada@coachella.org>; Celina Jimenez <cjimenez@coachella.org>; 'DVargas@IID.com' <DVargas@IID.com>; Eva Lara <elara@coachella.org>; Efrain Rodriguez <erodriguez@coachella.org>; 'Barraza, Guillermo' <GBarraza@IID.com>; Gabriel Martin <gmartin@coachella.org>; Gabriel Perez <gperez@coachella.org>; 'IC-Engineering@cvwd.org' <<u>IC-Engineering@cvwd.org</u>>; 'IC-EnvironmentalServ@cvwd.org' <<u>IC-</u> EnvironmentalServ@cvwd.org>; Jacob Alvarez <jalvarez@coachella.org>; 'Gerardo, Jose Luis' <<u>JLGerardo@IID.com</u>>; Lizzandro Diaz <<u>Idiaz@coachella.org</u>>; 'Itorres@cvusd.us' <<u>Itorres@cvusd.us</u>>; 'Abbott, Mark' <<u>MAbbott@RIVCO.ORG</u>>; Maritza Martinez <<u>mmartinez@coachella.org</u>>; 'mmirelez@tmdci.org' <mmirelez@tmdci.org>; 'ron@rgplanningconsultants.com' <<u>ron@rgplanningconsultants.com</u>>; Rene Rosales <<u>rrosales@coachella.org</u>>; 'rruofmplanningeast@fire.ca.gov' <<u>rruofmplanningeast@fire.ca.gov</u>>; 'rvasquez@riversidesheriff.org' <<u>rvasquez@riversidesheriff.org</u>>; 'sbliss@29palmsbomi-nsn.gov' <<u>sbliss@29palmsbomi-nsn.gov</u>> Subject: FW: RAC - AR No. 23-10: Armtec Defense Technologies

### Hello Everyone,

Just a friendly reminder that if your department has any comments for the *AR 23-10: Armtec Defense Technologies* project, please provide those comments by **tomorrow**, **Tuesday**, **July 18, 2023.** If you need more time to provide comments, please let me know.

Thanks, Adrian

## From: Adrian Moreno

Sent: July 03 23 11:59 AM

To: Andrew Simmons <asimmons@coachella.org>; Castulo Estrada <cestrada@coachella.org>; Celina Jimenez <cjimenez@coachella.org>; 'DVargas@IID.com' <DVargas@IID.com>; Eva Lara <elara@coachella.org>; Efrain Rodriguez <erodriguez@coachella.org>; 'Barraza, Guillermo' <GBarraza@IID.com>; Gabriel Martin <gmartin@coachella.org>; Gabriel Perez <gperez@coachella.org>; 'IC-Engineering@cvwd.org' <IC-Engineering@cvwd.org>; 'IC-EnvironmentalServ@cvwd.org' <IC-EnvironmentalServ@cvwd.org>; Jacob Alvarez <jalvarez@coachella.org>; 'Gerardo, Jose Luis' <JLGerardo@IID.com>; Lizzandro Diaz <Idiaz@coachella.org>; 'Itorres@cvusd.us' <Itorres@cvusd.us>; 'Abbott, Mark' <MAbbott@RIVCO.ORG>; Maritza Martinez <mmartinez@coachella.org>; 'mmirelez@tmdci.org' <mmirelez@tmdci.org>; 'ron@rgplanningconsultants.com' <ron@rgplanningconsultants.com>; Rene Rosales <rrosales@coachella.org>; 'rruofmplanningeast@fire.ca.gov' <rruofmplanningeast@fire.ca.gov>; 'rvasquez@riversidesheriff.org' <rvasquez@riversidesheriff.org>; 'sbliss@29palmsbomi-nsn.gov' <sbliss@29palmsbomi-nsn.gov> Subject: RAC - AR No. 23-10: Armtec Defense Technologies

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You may also access the files via Bluebeam Session ID: 454-368-850 https://studio.bluebeam.com/hyperlink.html?link=studio.bluebeam.com/sessions/454-368-850

If possible, please return comments by Tuesday, July 18, 2023.

If you have any questions, please feel free to contact me.

Thanks, Adrian Moreno Associate Planner | City of Coachella 53390 Enterprise Way Coachella CA, 92236 Office: 760-398-3502

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# CAL FIRE - RIVERSIDE UNIT RIVERSIDE COUNTY FIRE DEPARTMENT

BILL WEISER - FIRE CHIEF Office of the County Fire Marshal 77933 Las Montañas Rd, Ste. 201, Palm Desert, CA 92211 (760) 863-8886 www.rvcfire.org

July 11, 2023

**City Case Number:** Architectural Review 23-10 **Project Name:** Solar Panels for Armtec Defense Technologies **Reviewed By:** Chris Cox, Fire Safety Supervisor **Fire Department Case Number:** FPARC2300004

This submittal requires additional information and/or corrections to complete this review.

1. The plan shows the canopies separated across the driveway by a horizontal distance of 22 feet, 7 inches. The minimum fire lane width is 24 feet and the minimum vertical clearance of the fire lane is 13 feet, 6 inches. Therefore, the part of the canopy hanging over the fire lane should be a minimum height of 13 feet, 6 inches or the canopies should not hang over the required width of the fire lane.

If you have any questions or comments, then please contact me at 760-393-3386 or chris.cox@fire.ca.gov.

From:	Vasquez, Randy <rvasquez@riversidesheriff.org></rvasquez@riversidesheriff.org>
Sent:	July 18 23 10:51 AM
То:	Adrian Moreno
Subject:	RE: RAC - AR No. 23-10: Armtec Defense Technologies

No comments.

Lieutenant Randy Vasquez #1541 Thermal Station 86625 Airport Boulevard Thermal, CA 92274 E-mail: <u>rvasquez@riversidesheriff.org</u> Office: 760-863-8990 Desk: 760-863-7962



From: Adrian Moreno <<u>amoreno@coachella.org</u>> Sent: Monday, July 17, 2023 11:01 AM

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Subject: FW: RAC - AR No. 23-10: Armtec Defense Technologies

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