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Condition of Certification COMPLIANCE-12

Facility Closure Plan

For the

Rice Solar Energy Project

(09-AFC-10C)

Submitted to the:

California Energy Commission

Submitted by:

SOLARRESERVE

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Acronyms and Abbreviations

BMP	Best Management Practice
CPM	Compliance Project Manager
DB	Designated Biologist
DTC/CAMA	Desert Training Center / California-Arizona Maneuver Area
ITC	Investment Tax Credit
LOC	Letter of Credit
LORS	Laws, Ordinances, Regulations and Standards
LNTP	Limited Notice to Proceed
MCR	Monthly Compliance Report
RSEP	Rice Solar Energy Project

SECTION 1.0

1.0 Introduction

This Facility Closure Plan ("Plan") is being submitted to the California Energy Commission by Rice Solar Energy, LLC ("Applicant") pursuant to Condition of Certification CLOSURE-12 "Planned Closure" and describes the nature of the permanent closure and plans for continued use of facility land. The closure plan provides an analysis of the potential environmental impacts of the proposed activities. This plan is for permanent closure and transfer of property control to Owner, coincident with termination of the California Energy Commission (CEC) Application for Certification (AFC) License No. 09-AFC-10C.

1.1 Background

On December 15, 2010, the California Energy Commission issued a license to Applicant for the construction and operation of the Rice Solar Energy Project (RSEP or Project). During 2011 and 2012, the RSEP permitting and compliance team submitted approximately 200 pre-construction compliance documents and mitigation plans to the CEC Compliance Project Manager (CPM) for review and approval as required by the Conditions of Certification set forth in the RSEP license.

On August 16, 2013, the CPM issued a Limited Notice to Proceed (LNTP) to Rice Solar Energy LLC. This notice provided authorization for the Applicant to begin specific on-site activities related to desert tortoise fencing installation and clearance surveys as well as cultural resource surveys and feature recordation activities. Only work activities on the private property portion of the site were authorized by the CEC's LNTP. The private property is owned by Rice Development, LLC (Owner) and was under control by Applicant through a land lease option agreement, which has subsequently been terminated.

The Project was unsuccessful in securing the requisite funding necessary to support additional phases of development and construction. As a result, the desert tortoise exclusion fence, stormwater Best Management Practices (BMPs) and associated improvements were removed from the site during June of 2014. No additional activities have occurred on site since this time.

1.2 Site Description

The RSEP site is a privately owned parcel located in eastern Riverside County. The site is adjacent to State Route (SR) 62, which parallels a portion of the Arizona-California Railroad and the Colorado River Aqueduct, near the junction of SR 62 and Blythe-Midland Road, and near the sparse remains of the abandoned town of Rice, California. The nearest occupied residence is approximately 15 miles northeast at the rural crossroads community of Vidal Junction, California. The nearest town is Parker, Arizona (population 3,181) which located approximately 32 miles east. A small permanent residential settlement is located at the Metropolitan Water District of Southern California's Iron Mountain Pumping Plant, approximately 17 miles west. The Project location is shown in **Figure 1** below.

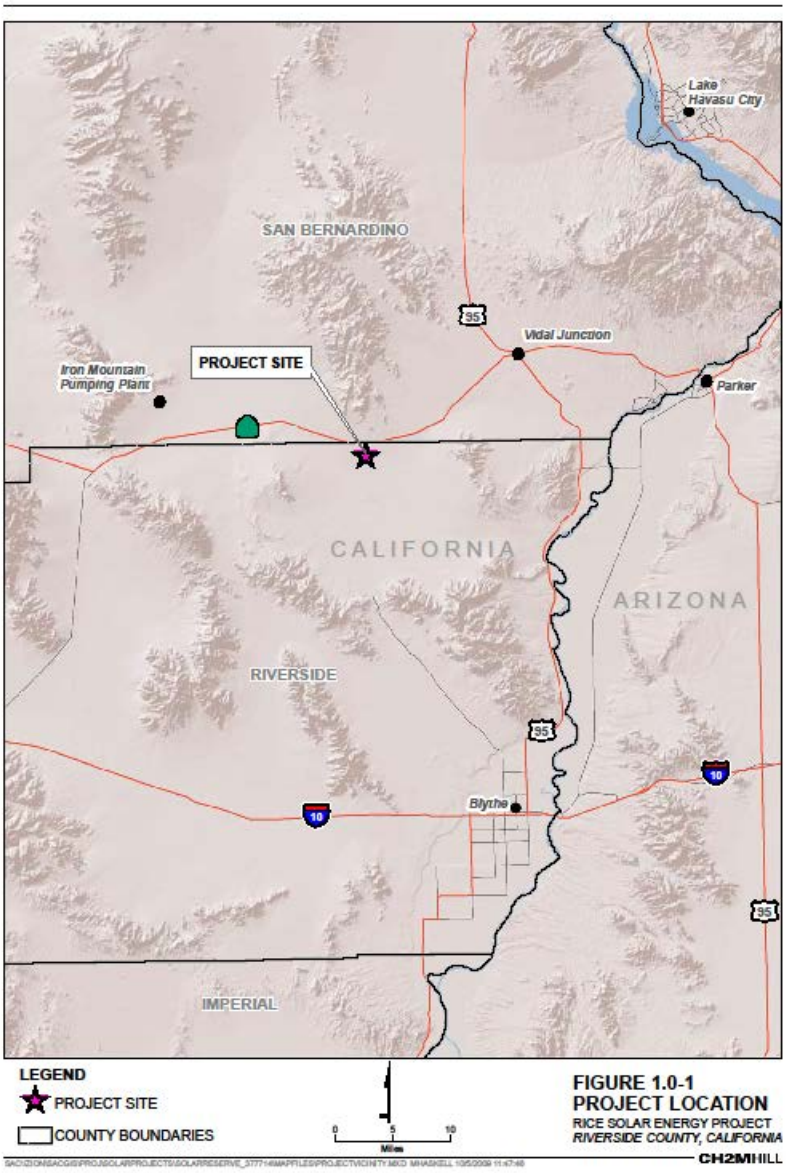

Figure 1 - Project Location

The RSEP is within a larger, privately owned holding that is 3,324 acres. The RSEP site is a brownfield development, having been used during World War II as Rice Army Airfield, a part of the Army's Desert Training Center/California-Arizona Maneuver Area (DTC/CAMA). The fourteen training facilities were first established in 1942 and operated until the last troops were deployed. The DTC/CAMA was demobilized and abandoned in 1944, and Rice Airfield was eventually transferred into private ownership and remained operational until the late 1950s.

Rice Army Airfield consisted of two 5,000-foot-long oiled runways, along with aircraft parking dispersal stands and taxiways, a parade ground, and small support buildings. Camp Rice, immediately east of the RSEP facility site, was a large tent city used to house infantry and artillery units such as the 5th Armored Division. Portions of the Rice Airfield are within the boundary of the RSEP site, whereas Camp Rice is located entirely outside the project's fenceline.

The land has remained dormant since the late 1950s. Remains of Rice Airfield include remnants of runways and dispersal pads, a cement parade ground, and concrete pads that were foundations for administrative structures, barracks, etc. The entire site has been recolonized by burrobush and native grasses, but only partially by fully developed creosote bush scrub.

Stormwater runoff is currently channeled by large berms constructed upslope of the RSEP for the Colorado River Aqueduct and Arizona-California Railroad. Water is funneled by these berms to two separate locations where it crosses under the railroad, aqueduct, and SR 62 and empties onto the project site. The berm on the eastern site of the project was breached at some point in time, long before the Project commenced. As a result, these flows are transitioned to surface flow and are conveyed to the south of the site at an approximate slope of 2.0%.

The site generally slopes from north to south with elevations of approximately 920 to 750 feet above mean sea level. The property is comprised of creosote bush scrub vegetation. Average annual precipitation ranges from about 3 inches at the lower elevations, to 8 inches in the higher elevations of the mountains west of the Rice Valley.

1.3 Facility Closure Plan

The Facility Closure Plan (Plan) is being submitted to the California Energy Commission (CEC) pursuant to Condition of Certification (COC) COMPLIANCE-12 as found in the Commission Final Decision for RSEP (CEC, 2010). The concrete objectives of the Plan described in COMPLIANCE-12 are stated as follows:

The plan shall:
1. Identify and discuss any impacts and mitigation to address significant adverse impacts associated with proposed closure activities and to address facilities, equipment, or other project related remnants that will remain at the site;

2. Identify a schedule of activities for closure of the power plant site, transmission line corridor, and all other appurtenant facilities constructed as part of the project;

3. Identify any facilities or equipment intended to remain on site after closure, the reason, and any future use; and

4. Address conformance of the plan with all applicable laws, ordinances, regulations, standards, and local/regional plans in existence at the time of facility closure, and applicable conditions of certification.

Prior to submittal of the proposed facility closure plan, a meeting shall be held between the project owner and the Energy Commission CPM for the purpose of discussing the specific contents of the plan.

In the event that there are significant issues associated with the proposed facility closure plan's approval, or if the desires of local officials or interested parties are inconsistent with the plan, the CPM shall hold one or more workshops and/or the Energy Commission may hold public hearings as part of its approval procedure.

As necessary, prior to or during the closure plan process, the project owner shall take appropriate steps to eliminate any immediate threats to public health and safety and the environment, but shall not commence any other closure activities until the Energy Commission approves the Facility Closure Plan."

1.4 Facility Closure Overview

As outlined below, the construction activities that took place on site were severely limited in scope, impact and duration. The activities were sanctioned under a restrictive Limited Notice to Proceed (LNTP) from the CEC, and were designed to create an area encircling the ultimate Project that was devoid of desert tortoise, which can only be accomplished during certain times of the year. This resulted in limited clearing and earthwork activities as necessary to install the desert tortoise fence and clear the interior areas.

Full construction activities on-site were never realized. Despite diligent efforts to achieve financial close and advance RSEP into full construction, this goal was not achieved. Contributing factors to this lack of success include:

- The investment tax credit (ITC) for renewable energy was slated to drop from 30 percent to 10 percent at the end of 2016, and was only available for projects that are fully online prior to
- Changes in the energy market including inexpensive natural gas and a devaluation in the inherent molten salt thermal energy storage
- Schedule delays in the flagship Crescent Dunes Solar Energy Project eroded lender confidence

The fence and associated improvements were removed 8-months later in June of 2014 and the site has been dormant since this time. A more detailed description of the constructions activities is provided below.

1.4.1 Desert Tortoise Fence Installation

RSEP construction commenced in August of 2013 under a LNTP from the CEC. The LNTP was issued on August 16, 2013 and authorized only the construction and related activities outlined below. The LNTP did not allow for the full mobilization and construction start activities, which were intended to commence in March of 2014. The scope of work associated with the LNTP is as follows:

- Site access in order to complete biological surveys
- Installation of biological mitigation fencing
- Implementation of biological protection measures
- Cultural surveys and feature recordation
- Construction surveying and flagging
- Desert tortoise surveys, fence installation and translocation (if necessary)

The approved Designated Biologists (DB) arrived on site August 26, 2013 in advance of the land surveyors and set up a recreational vehicle (RV) on the concrete pad to serve as a base for all biological monitoring.

Surveying activities commenced on August 27, 2013 to delineate the following construction activities:

- Approximately 32,800 linear feet of desert tortoise fence
- Two (2) desert tortoise guards (at each entry location)
- Geotechnical borings and test pit locations

Construction of the desert tortoise fence commenced on September 3, 2013. This work required the use of a grader to clear an 18-foot wide alignment and cut a v-ditch one-foot below existing grade along the proposed desert tortoise fence centerline. Following excavation of the v-ditch, the Contractor began installation of t-posts at 10-foot offsets; these posts were installed 18 inches below the bottom of the

v-ditch. As the posts were installed, the Contractor (Crown Fence) began securing the desert tortoise fence fabric to the posts with metal hog rings. Finally, the v-ditches were backfilled and compacted to match existing elevations and provide the requisite 12-inch embedment depth below finished grade. The 18-foot wide alignment adjacent to the desert tortoise fence effectively served as an access road to construct the fence and move construction equipment and personnel through the site. This road remains as the only visible evidence of construction.

Plans for the construction of this fence are provided as **Appendix A.** Additionally, the fence can be seen after backfill in **Figure 2** below.

Figure 2 - Desert Tortoise Fence with Backfill

Though not required by the RSEP permit conditions, the Project Owner agreed with a recommendation by the Designated Biologist to install temporary desert tortoise shelter sites along the project perimeter fence line. These structures consisted of 36" lengths of 12" PVC pipe sections cut longitudinally, which were installed at strategic locations (i.e. angle, trap or confusion points) and 280-meter intervals on both sides of the fence. See **Figure 3** below for an image of these desert tortoise shelter sites.

Figure 3 - Desert Tortoise Shade Structure

In addition to the work described above, it was determined that erosion control measures known as Best Management Practices (BMPs) were required across the eastern wash which intersects the perimeter fenceline on the northeastern side of the site. A total of 75 straw bales (288 linear feet) were placed side by side, with a small gap between them in order to convey stormwater flows but reduce water velocity and collect transported debris before it comes into contact with the fence. The bales were placed 8 feet upstream of the fence and anchored into the ground with steel rebar. These BMPs are depicted in **Figure 4**.

Figure 4 - Stormwater BMPs installed along NE portion of fence

A myriad of biological and cultural endeavors were conducted in conjunction with this work, in order to satisfy the associated Conditions of Certification (COC). These activities are outlined in detail in Monthly Compliance Report (MCR) Nos 1 and 2.

All construction activities were complete by October 11, 2013. The subsequent monthly survey and inspection activities are detailed in MCR Nos. 3-9.

1.4.2 Desert Tortoise Fence Removal

Unable to secure financial close, the Project Owner removed all of the construction improvements described in Section 1.4.1 approximately eight months following their installation. This includes the desert tortoise fence, shelter and guards, along with the stormwater BMPs and meteorological equipment. The latter was previously installed to monitor site conditions and support financial modeling efforts.

These removal activities commenced on June 9, 2014 as described in MCR No. 10. The work included removing the t-posts, which resulted in soil disturbance up to one-foot in depth. The tortoise fence was rolled up as well so it could be easily moved offsite for recycling. This was performed utilizing a special attachment on the "Bobcat" machinery. The Bobcat was subsequently used with a different attachment to grade and flatten these disturbed areas following the completion of fence removal. This resulted in restoration of the site to an even, natural surface. See **Figure 5** below for illustration.

Figure 5 - Grade Restoration after Fence Removal

This work was supervised by the DB and their staff, and included avian studies along the fenceline. The CEC's Compliance Project Manager (CPM) at the time, Mr. Bruce Boyer, visited the site on June 10, 2014 to observe the construction activities. All work was completed by June 18, 2014 which marks the last time manmade disturbance to the land occurred.

1.5 Summary of Potential Environmental Impacts of Closure

This Facility Closure Plan includes a discussion of impacts that closure may have on the environment, and proposed measures to mitigate any potentially significant adverse impacts (if applicable).

The COC COMPLIANCE-12 stipulates that provisions are made to provide the flexibility to deal with the specific situation and project setting that exist at the time of closure. Laws, Ordinances, Regulations, and Standards (LORS) pertaining to facility closure are identified in the sections dealing with each technical area. Facility closure shall be consistent with all applicable LORS in effect at the time of closure.

The Sections of this Plan that follow contain detailed discussions of the potential environmental impacts associated with facility closure modifications, as well as an evaluation of the closure procedures with respect to applicable LORS. These Sections summarily conclude that there will be no significant negative environmental impacts associated with implementing the actions specified in the Facility Closure Plan, and that the closure process will comply with all applicable LORS.

Appendix C contains a letter from the landowner acknowledging receipt of the property in an "as-is" condition, and indicating that any improvements made in the future after transfer of control to them (and termination of the RSEP AFC license) will comply with applicable LORS.

SECTION 2.0

2.0 Impacts and Mitigation

This Section addresses the following provision of COMPLIANCE-12:

1. *Identify and discuss any impacts and mitigation to address **significant adverse impacts** associated with proposed closure activities and to **address facilities, equipment, or other project related remnants that will remain at the site;***

2.1. Significant Adverse Impacts Associated with Closure Activities

Nominal work was performed under the LNTP, which amounted to a desert tortoise fence and access road around the project perimeter. At a total width of approximately 18-feet, and a total length of approximately 6.2-miles, this equates to an overall land disturbance of 13.5 acres which represents a scant 0.4% of the total site area (3,324-acres).

These improvements were removed approximately eight months after installation, in June of 2014. Prior to abandonment, earthwork activities were conducted to restore construction areas to existing grades. The site has not been disturbed subsequently, and has undergone a naturally occurring restoration process resulting in the continual eradication of visible disturbances.

The natural weather processes include wind, sun, rain and seed transfer, which have served to perpetually advance the process, whereas there is virtually no evidence of manmade disturbance. The seasonal germination process has resulted in the natural revegetation of previously disturbed areas, which are comprised of burrobush and native grasses, as well as creosote bush scrub.

As a result of the factors outlined above, there are no significant adverse impacts associated with closure activities. This is explained in additional detail below.

2.1.1. Geotechnical Conditions and Visual Evidence

A Geotechnical Engineering Report was prepared by Terracon in January of 2014 for the site. This report describes the upper 5 to 30 feet of stratum as "*sand with variable amounts of silt, clay and gravel*". These loose, alluvial soils are readily subject to wind and water transfer, which has occurred continually since June of 2014. As a result, deviations in surface elevation and acute undulations have smoothed over time.

This progress can be evidenced in the Natural Revegetation Exhibit contained in **Appendix B.** This exhibit shows photographs taken on-site in the Start, West, South, East and North positions along the desert tortoise fenceline. From each vantage point, a series of three photographs is compared. These photographs occurred in March of 2016, December of 2016 and May of 2017. This exhibit provides photographic evidence that the natural grades and vegetation have been progressively reestablished over time.

The changes are more pronounced in some portions of the field than others, but are demonstrably occurring everywhere. In some areas, the desert tortoise fence access road is barely perceptible. This is especially true in the eastern portion of the site. The reason for this is that the large diversion swale on the

eastern portion of the site, which conveys runoff from the north, was breached in the past (long before the Project conception) and no longer conveys flows around the airfield. Instead, this runoff flows to the south, were it serves to transport soil and vegetation across the desert tortoise fence access road, which expedites the restoration to existing conditions in these areas.

In addition to the photographs shown in **Appendix B**, which were taken with an emphasis in consistency, certain portions of the desert tortoise fence access road are barely recognizable. This is clearly evidenced in **Figure 6** below, taken in December of 2018 in the location where the stormwater BMPs were once sited.

Figure 6 - Desert Tortoise Fence Access Road at BMP Location

2.1.2. Condition of Certification BIO-10

Condition of Certification BIO-10 is a consideration with respect to closure of the Project. Specifically, this condition pertains to "Revegetation Plan and Compensation for Impacts to Native Vegetation Communities". The fundamental objective of this COC is that "*Upon completion of construction, all temporarily disturbed areas, including the logistics/lay down areas; all generator tie-line tower sites, pull sites, and similar areas shall be restored to pre-project grade and revegetated to minimize soil erosion and vulnerability to weed invasion*."

The desert tortoise fence and access road was a temporarily disturbed area, which triggers this COC. However, the grades have been restored to pre-project grades as shown in **Figure 5** and **Appendix B.** Further, nearly five-years of naturally occurring processes have resulted in a natural revegetation of the temporarily disturbed areas. As articulated below, the landowner is not requesting any additional improvements at this time, nor are they requesting compensation for the temporary impacts.

2.1.3. Landowner Considerations

The private landowner has been consulted regarding the Facility Closure Plan. This is evidenced in **Appendix C** titled **"**Landowner Request to Eliminate Revegetation Requirement". Based on financial needs to repurpose the land for immediate acquisition, the landowner had adamantly stated their position as follows:

"…as the private landowner we intend to reinvigorate our search for prospective buyers or lessees, whereby the ultimate land utilization is to be determined. Executing the requirements under BIO-10 adds no perceived value to the land, and the future occupants are likely to undo any revegetation efforts performed. Additionally, ongoing revegetation efforts may actually create complications for us with respect to the land exchange.

Therefore, we respectfully request that neither Rice Solar Energy, LLC nor any other party conduct any additional site disturbances or revegetation efforts under BIO-10 on our property."

Further, the landowner has provided affirmation that all future improvements will similarly follow all laws, ordinances, regulations and standards (LORS) in place per the following:

"We recognize that any development and improvements at the site would be subject to applicable laws, ordinances, regulations and standards enforced by other agencies, including but not limited to, Riverside County."

2.2. Facilities, equipment, or other project related remnants that will remain at the site;

All facilities, equipment or project related remnants that were temporarily transported to the site have been subsequently removed. This includes the following:

- Desert Tortoise Fence (including posts, wire mesh, hog rings, guards, etc.)
- Meteorological Equipment (including security fence, foundations, etc.)
- Temporary Construction/Personnel Equipment (including Biologist RV, construction equipment, temporary stockpiles, portable bathrooms, etc.)

The only remnants remaining were present prior to the start of development as described in Section 1.2, and include the existing concrete tarmac, miscellaneous fences and an abandoned car. No additional activities are required for facility closure.

SECTION 3.0

3.0 Schedule of Activities

This Section addresses the following provision of COMPLIANCE-12:

2. Identify a **schedule of activities** for closure of the power plant site, transmission line corridor, and all other appurtenant facilities constructed as part of the project;

No additional activities are required at this time for facility closure. The site has been dormant since June of 2014 when all manmade construction improvements were removed from the site. Further, as documented in Section 2.1.2 above, there is an immediate need for the landowner to resume care, custody and control of the private land. Therefore, Applicant requests that this Plan and the termination of the AFC license proceed as expeditiously as possible.

SECTION 4.0

4.0 Facilities and Equipment to Remain

This Section addresses the following provision of COMPLIANCE-12:

3. Identify any **facilities or equipment intended to remain on site** after closure, the reason, and any future use;

There are no facilities or equipment introduced as a result of site construction that currently remain on site. As a result, there is no need to identify any facilities or equipment intended to remain, as they are nonexistent.

SECTION 5.0

5.0 Compliance with Applicable LORS

This Section addresses the following provision of COMPLIANCE-12:

4. Address conformance of the plan with all **applicable laws, ordinances, regulations, standards, and local/regional** plans in existence at the time of facility closure, and applicable conditions of certification.

This Plan conforms to all applicable laws, ordinances, regulations, standards and local/regional plans in existence, as no additional activities or site disturbance are requested.

Additionally, as it pertains to future utilization of the site, **Appendix C** "Landowner Request to Eliminate Revegetation Requirement " stipulates that "*(Owner) recognize that any development and improvements at the site would be subject to applicable laws, ordinances, regulations and standards enforced by other agencies, including but not limited to, Riverside County."*

SECTION 6

6.0 Remaining Conditions

This Section addresses the following provisions of COMPLIANCE-12:

> Prior to submittal of the proposed facility closure plan, a **meeting shall be held** between the project owner and the Energy Commission CPM for the purpose of discussing the specific contents of the plan.

On April 26, 2019 at 10:00 am PDT the Applicant conducted a teleconference with members of the CEC including Keith Winstead, Christine Root and Jonathon Fong. During the meeting, Applicant discussed desire to terminate the AFC license, while abandoning the site in its current condition. CEC indicated that a Facility Closure Plan be submitted which is compliant with pertinent Conditions of Certification.

> In the event that there are s**ignificant issues associated with the proposed facility closure plan's approval**, or if the desires of local officials or interested parties are inconsistent with the plan, the CPM shall hold one or more workshops and/or the Energy Commission may hold public hearings as part of its approval procedure.

Applicant does not foresee significant issues associated with the proposed facility closure plan, whereby this condition is not applicable.

> As necessary, prior to or during the closure plan process, the project owner shall take appropriate steps to **eliminate any immediate threats to public health and safety and the environment,** but shall **not commence any other closure activities until the Energy Commission approves the Facility Closure Plan**

The proposed closure as described herein poses no immediate threats to public health and safety and the environment.

SECTION 7

7.0 Environmental Analysis of Closure

The table below lists the fourteen (14) environmental disciplines that are considered in the CEC Staff Assessment and Commission Final Decision, along with comments summarizing the focus of the environmental analysis. This analysis indicates that closure will have no significant adverse environmental impacts.

Discipline	Summary of Environmental Analysis and Topics
Air Quality	Closure will result in a net benefit because the construction-related emissions that would otherwise occur to construct and operate the facility will not occur.
Biological Resources	Condition BIO-10 pertains to the "Revegetation Plan and Compensation for Impacts to Native Vegetation Communities". It is important to note that the construction improvements consisted of desert tortoise fence installation and removal only. As an ancillary disturbance, the land adjacent the fence was temporarily disturbed for construction access. Since all construction activities ceased the site has remained dormant for approximately five years, and the natural revegetation process is well underway. Any disturbances at this point would represent a setback in the natural processes. Further, the landowner has explicitly requested that the requirements for revegetation by waived, as this site is on private land. The intent of this Facility Closure Plan is to request a waiver of the stringent requirements outlined in BIO-10, based on discretionary assessment of this specific circumstances.
Cultural Resources	Closure will involve no ground-disturbing activities and will have no effect on cultural resources. Closure without any additional disturbance will result in a net benefit as there is no possibility for denigration of cultural resources.
Geology and Paleontology	Closure will involve no ground-disturbing activities and will have no effect on geological and paleontological resources. Closure without any additional disturbance will result in a net benefit as there is no possibility for denigration of geological or paleontological resources.
Hazardous Materials Management	Closure will not involve the use of hazardous materials.
Land Use	Land use will not change because of closure.
Noise	Closure would have no effect on noise. Closure without any additional disturbance will result in a net benefit as there is no possibility for creation of noise.
Public Health	There would be no effect on public health resulting from closure.
Socioeconomics	The local economy and tax base would not receive economic benefits which would otherwise accrue from construction and

	operation of the RSEP. However, the Project is not financially feasible.
Soil and Water Resources	There would be no adverse change to drainage facilities or water quality resulting from closure. Closure without any additional disturbance will result in a net benefit as there is no utilization or disturbance of soil and water resources.
Traffic and Transportation	Closure will not generate any traffic. Closure without any additional disturbance will result in a net benefit as there is no traffic.
Visual Resources	There will be no change in terms visual resources resulting from closure.
Waste Management	Closure will not generate wastes.
Worker Safety and Fire Protection	There are no substantial health and safety risks resulting from closure. Closure without any additional disturbance will result in a net benefit as there is no possibility for worker injury or fire.