



San Francisco Bay Chapter

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June 8, 2020

Alameda County Planning Department
Attention: Andrew Young
224 W. Winton Ave., Room 111
Hayward, CA 94544

submitted via e-mail

Re.: Environmental Impact Report scoping comments for the Aramis Solar Energy Generation and Storage Project, County Planning Application PLN2018-00117

Dear Andy,

The Sierra Club appreciates the opportunity to submit scoping comments for the Environmental Impact Report of the Aramis utility scale solar energy facility proposed for the west side of North Livermore Avenue at May School Road. Our comments fall into five categories: biological impacts, aesthetic impacts, agricultural impacts, project alternatives, and miscellaneous. The first three categories include cumulative impacts.

Biological impacts: The East Alameda County Conservation Strategy (EACCS) and other studies document both the presence of and suitable habitat for numerous special status species on and in the vicinity of the project site. The EACCS analyzed 19 focal species that are known or likely to occur in eastern Alameda County. Focal species are sensitive species that would be adversely affected or their habitats adversely affected by activities or projects in the area. Of the 19 focal species in the entire east Alameda County study area, nine focal species, nearly half of all focal species analyzed, occur or have the potential to occur in the Aramis project site based on mapping in the EACCS. Nevertheless, the documents accompanying the project proposal discuss only one species, the California red-legged frog. The eight other EACCS focal species are not mentioned, much less are potential impacts to them detailed. This is a remarkable oversight. The eight other focal species are the Callippe silverspot butterfly, California tiger salamander, Foothill yellow-legged frog, Golden eagle, Tricolored blackbird, Western burrowing owl, American badger, and San Joaquin kit fox. Potential harm to these species or their habitats must be analyzed in the EIR.

Impacts both from construction and operation of the facility should be included in the analysis, and mitigations both for construction and operational impacts should be proposed. The EACCS sets forth various mitigation factors for impact to the focal species it evaluated. That is a good starting point for the Aramis EIR. Nevertheless, the EACCS is now 10 years old. Newer research should be reviewed to determine if additional species should be evaluated and if the mitigation measures for the EACCS focal species remain adequate. One particular operational impact should be evaluated fully. The project proponent indicates that sheep grazing will replace cattle grazing as the agricultural activity on the

project site. Sheep are very different animals from cattle; sheep will undoubtedly have different impacts. Sheep grazing must be specifically evaluated for its impacts to both special status plants and animals. Just the difference in number of grazers when switching from cattle to sheep could lead to significant impacts. Such impacts must be evaluated and mitigated for.

The Aramis project is proposed to operate for at least 50 years. Considerable change in climatic and other conditions may occur in north Livermore over this period. These changes could influence the biological range of plants and animals in the area including species protected under state and federal law. To the extent possible, impacts to biological resources over this time scale should be evaluated. Range changes over the past 20-30 years may give some indication of potential future changes and therefore what additional environmental impacts might occur in the future. Periodic ongoing environmental evaluations and appropriate additional mitigations should be a condition of approval in any CUP.

Cumulative impacts to biological resources must be fully evaluated. PG&E's Cayetano substation clearly is ground zero for the targeting of utility-scale solar energy facilities (SEFs) in north Livermore. The zone for additional environmental impacts will radiate away from the substation like the blast zone of a bomb. The DEIR for the Livermore Community Solar Energy Facility proposed directly east across N. Livermore Avenue from the substation is quite explicit about the potential for more utility-scale SEFs. "The Livermore Valley provides ideal physical conditions for the development of solar photovoltaic (PV) facilities, having extensive level areas of undeveloped land and a climate with an abundance of sunny days...[I]t is likely that in the near future other solar PV projects will be proposed and built in the Livermore Valley." (DEIR, P. 4.4-23, emphasis added.)

Aesthetic Impacts – North Livermore is scenic agricultural open space with views in all directions of surrounding pasturelands, rolling hills and distant mountains. The County has designated North Livermore Avenue as a Scenic Recreational Rural Route. Bicyclists, motorcyclists and sightseeing drivers frequent this area because of its scenic character. Impacts to scenic views must be honestly evaluated. The Aramis project alone will contain some 320,000 solar collectors spread across the landscape. Even when stowed, the project description indicates they will be 8 feet high. In operation, they are likely to be considerably higher. These industrial structures will blanket a large area of approximately 420 acres and be visible from a great distance. Without a doubt, they will change the visual character of the area from open farmland to a large-scale solar power plant. Any mitigations proposed to screen this vast array of collectors will themselves lead to changes in the visual character of the area since they will have to be continuous as well as tall enough to hide the arrays, and will cover large stretches of area. The environmental impact report should be an honest document so that the public and decision makers know exactly the visual changes that are being proposed for this area, and whether the impacts to visual resources will be significant and unavoidable even after mitigation.

Cumulative impacts from the Aramis project together with the neighboring Livermore Community SEF, as well as other likely projects should be evaluated. While a single project might from a distance look tolerably like a man-made lake as the project proponent suggests, north Livermore is not a lake district. It is dry farmland, lushly green in the winter and early spring, and golden brown for the remainder of the year. The sky is blue; north Livermore is not. The cumulative change to the visual character of the area from potentially many hundreds of thousands of solar collectors covering perhaps several thousand acres of farmland must be evaluated.

Agricultural Impacts – The impact of the Aramis project on agriculture should be evaluated. The project proposes to replace cattle grazing with sheep grazing and bee keeping. Do these agricultural activities currently exist to any great degree in north Livermore? Are the proposed substitutes for cattle grazing truly viable or are they pretenses to obscure the change from agriculture to large-scale industrial power production? In most cases where non-owner grazing occurs, the land is leased out. Will the Aramis parcels actually be leased out and generate real revenue from the grazing tenant, or will the landowner accept a token payment with the sheep in effect used mainly as a form of weed control among the solar collectors? How will the sheep grazing lease compare to nearby cattle leases? The California Department of Conservation does not consider solar electric facilities to be genuine agriculture consistent with the Williamson Act. Why should the County and the public believe this is real agriculture being proposed even for the land not under the Williamson Act?

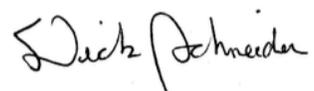
Cumulative impacts to county agriculture should be evaluated. The current agricultural production in north Livermore consists mainly of dry land farming and cattle grazing. A critical mass of agriculture may be necessary for these agricultural uses to survive. As land is taken out of production for these activities, will this lead to more land being converted to primarily non-agricultural uses? According to Department of Conservation statistics, between 1984 and 2016, over 16,000 acres of grazing land in Alameda County were converted to non-agricultural uses. This is already an alarming trend and the proposed project together with others is likely to exacerbate the cumulative loss of agriculture in the county. This impact should be evaluated.

Project Alternatives – The staff report for this EIR indicates that a No Project alternative will be evaluated, but that no other alternatives have been selected. In particular, an alternative location “is not presently under consideration.” We believe that a distributed energy generation alternative should be evaluated. Distributed generation means electricity that is produced in already developed areas where the energy will be consumed. Distributed generation is generally believed to produce fewer environmental impacts than large-scale central station generation. Moreover, East Bay Community Energy, Alameda County’s community choice aggregation authority, prepared an analysis showing that over 650 MW of technical solar siting potential exist on built areas of the county, and that 30% of the total comes parking lots and parking garages. The latter sites alone have the potential to generate 195 MW of solar power, very nearly twice what the Aramis project would produce. If some of these sites are not viable, there still could be the possibility of generating as much solar energy as Aramis without the environmental impacts to biological, agricultural and scenic resources.

Miscellaneous impacts – The project proposes 100 MW of lithium ion battery storage in four 100-ft x 180-ft buildings occupying 72,000 square feet of building area (1.65 acres of buildings). The EIR must analyze the environmental impact of this project component. What are the toxic substances in lithium ion batteries and associated electrical equipment? What happens to them in the event of a catastrophic fire? Do they vaporize and present an air pollution hazard to nearby residents or even for more distant Tri-Valley residents downwind? Can a large fire at a lithium ion battery facility be extinguished with water delivered by area fire trucks? What toxic materials might leach into groundwater as a result of contaminated fire-fighting water? What impact might those toxic substances have on nearby residents who derive their drinking water from wells in the vicinity? What impacts to wildlife and plants from catastrophic fires that release toxic materials. There are impacts that need to be presented in the EIR.

We hope the above comments will help lead to a thorough environmental impact review of the project. We look forward to reviewing the Draft Environmental Impact Report when it is released for public comment.

Respectfully submitted,

A handwritten signature in black ink that reads "Dick Schneider". The signature is written in a cursive style with a large initial "D".

Dick Schneider, Sierra Club Tri-Valley Group

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