COMMUNICATIONS AND REPORTS
OCTOBER 21, 2025

The following communications and reports were received, duly noted, and ordered placed on file with the Clerk:

COMMUNICATIONS

A. Correspondence and attachment from the Washoe County Treasurer regarding the Washoe County Library System request for a library change fund reduction, dated August 20, 2025.

B. Application Extension to the Public Utilities Commission for permit to construct the Rock Springs Solar Project, consisting of an up to 120 MW photovoltaic solar electric generating facility, a 345 kV onsite substation, a 345 kV generation-tie line, an up to 84 MW battery energy storage system, and associated facilities, CED Rock Springs Solar, LLC.

C. North Lake Tahoe Fire Protection District, fully executed Resolution 25-04 adopting the 2024 Lake Tahoe Nevada Fire Code.

D. North Lake Tahoe Fire Protection District, fully executed Resolution 25-05 adopting the 2024 Lake Tahoe Nevada Wildland-Urban Interface Code.

E. Email from the Verdi Television District with the following attachments: Proprietary Fund Fiscal Report; financial statements dated June 30, 2024; correspondence from the Nevada Department of Taxation regarding the Fiscal Year 2024 Annual Audit Report; February 27, 2025, approved meeting minutes; correspondence from the Nevada Department of Taxation regarding the 2025 exempt status for Fiscal Year 2025-2026; April 10, 2025, draft meeting minutes; Western Surety Company Bond Rider; correspondence from the Verdi TV District regarding status of licenses; correspondence from the Verdi TV District regarding a recommendation for continuation and statement of importance; correspondence regarding the status of equipment; Final Budget for the fiscal year ending June 30, 2025.

F. Application to the Public Utilities Commission for permit to construct the NVSolarWRX LLC, a 450 MW Solar Energy Generating Facility, 345 kV Project Substation, 345 kV generation-tie line, and associated facilities, including an energy storage system to be located in Washoe County, Nevada, pursuant to the Utility Environmental Protection Act.

MONTHLY STATEMENTS/REPORTS

A. Clerk of the Court, Monthly Financial Statement for the month ending August 31, 2025.

B. Washoe County Treasurer, Monthly Statement for the month ending August 31, 2025.

C. Clerk of the Court, Monthly Financial Statement for the month ending September 30, 2025.

D. Washoe County Treasurer, Monthly Statement for the month ending September 30, 2025.

EXECUTED CONTRACTS

A. University of Nevada, Reno (UNR), University Organization Agreement (original Minute Item # 21-0943).

OFFICE OF THE
WASHOE COUNTY TREASURER

August 20, 2025

BOARD OF COUNTY COMMISSIONERS
WASHOE COUNTY
RENO, NEVADA

RE: LIBRARY CHANGE FUND REDUCTION

Honorable Commissioners:

On June 16, 2018, the Washoe County Board of Commissioners approved a request to increase the change fund for the Library System by $865.00 for a total of $1,910.00

On August 1, 2025, a request to reduce the change fund by $150.00 was submitted by the Library System.

On August 19, 2025, the $150.00 was deposited into the County's Wells Fargo checking account for the benefit of the general fund.

Linda Jacobs, Chief Deputy Treasurer

ADMINISTRATION COMPLEX
1001 EAST NINTH STREET
SUITE D-140

PO BOX 30039
RENO, NEVADA 89520-3039

PHONE (775) 328-2510
FAX (775) 328-2500
www.washoecounty.gov/treas

WASHOE COUNTY
LIBRARY SYSTEM

August 1, 2025

Justin Taylor
Washoe County Treasurer
1001 E. 9th Street, Room D140
Reno, NV 89512-2845

Re: Adjustment of Change Funds in Library Branches

Dear Mr. Taylor:

Washoe County Library is requesting adjustment to the change funds for three of our branches. Due to the elimination of Fines & Fees. As these funds are no longer required for daily operation, we propose the following changes:

- **Sierra View Branch:** $250.00 → $200.00
- **Northwest Branch:** $250.00 → $200.00
- **Senior Center (Partner Branch):** $50.00 → $0.00

Please prepare a staff report for the Board of County Commissioner's approval. If you have any questions or need additional information, please contact Marilyn Storey at 775-327-8342.

Thank you for your attention to this matter.

Sincerely,

Stacy McKenzie
Acting Director

Administration
301 South Center Street
P.O. Box 2151, Reno, Nevada 89505
(775) 327-8341
www.washoecountylibrary.us

Holland & Hart

Bryce C. Alstead
Partner
Phone 775.327.3067
BAlstead@hollandhart.com

September 19, 2025

VIA ELECTRONIC FILING

Trisha Osborne
Assistant Commission Secretary
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701-3109

Re: Docket No. 20-12032 - Application of CED Rock Springs Solar, LLC, under the provisions of the Utility Environmental Protection Act, for a permit to construct the Rock Springs Solar Project consisting of an up to 120 MW photovoltaic solar electric generating facility, a 345 kV onsite substation, a 345 kV generation-tie line, an up to 84 MW battery energy storage system, and associated facilities to be located in Washoe County, Nevada.

Dear Ms. Osborne:

Accompanying this letter for filing with the Public Utilities Commission of Nevada is CED Rock Springs Solar, LLC's Reply in Support of its Motion for Extension of the Compliance Order issued in the above- referenced docket on March 5, 2021.

Should you have any questions or concerns, please do not hesitate to reach out.

Sincerely,

/s/ Bryce C. Alstead

Bryce C. Alstead
Partner
of Holland & Hart LLP

BCA:cpm
Enclosures

35794239_v1

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Application of CED Rock Springs Solar, LLC, under the provisions of the Utility Environmental Protection Act, for a permit to construct the Rock Springs Solar Project consisting of an up to 120 MW photovoltaic solar electric generating facility, a 345 kV onsite substation, a 345 kV generation-tie line, an up to 84 MW battery energy storage system, and associated facilities to be located in Washoe County, Nevada.	Docket No. 20-12032

REPLY IN SUPPORT OF MOTION FOR EXTENSION OF COMPLIANCE ORDER

CED Rock Springs Solar, LLC ("Applicant"), by and through its undersigned counsel of Holland & Hart LLP, respectfully files with the Public Utilities Commission of Nevada (the "Commission") this Reply in Support of Motion for Extension of Compliance Order, to allow a two-year extension of time to obtain and file the remaining compliance items in the order granting Applicant's application under the provisions of the Utility Environmental Protection Act ("UEPA"), as issued in the above-referenced docket on March 5, 2021 ("Compliance Order").

On September 12, 2025, Applicant filed a Motion for Extension of Compliance Order ("Motion") to allow for a two-year extension of time to obtain and file the remaining compliance items in the Compliance Order. On September 18, 2025, the Commission's Regulatory Operations Staff ("Staff") filed a Response to the Motion indicating that Staff does not oppose the Motion and recommending that the Commission grant the Motion. Applicant appreciates Staff's support in this matter and respectfully requests that the Commission grant the Motion.

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HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

DATED and respectfully submitted this 19th day of September, 2025.

HOLLAND & HART LLP

By: /s/ Bryce C. Alstead

Bryce C. Alstead (Nevada Bar No. 9954)
Amber L. Rudnick (Nevada Bar No. 16314)
5470 Kietzke Lane, Suite 100
Reno, NV 89511-2094
balstead@hollandhart.com
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Tel.: 775.327.3000
Fax: 775.786.6179

Attorneys for *CED Rock Springs Solar, LLC*

HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Holland & Hart LLP and on September 19, 2025, I caused to be served a true and correct copy of the foregoing document to the following:

ELECTRONIC MAIL

Nevada State Clearinghouse
Department of Conservation & Natural Resources,
Division of State Lands
901 S. Stewart Street, Ste. 5003
Carson City, NV 89701
nevadaclearinghouse@lands.nv.gov

ELECTRONIC MAIL

Ernest Figueroa, Esq.
Nevada State Consumer Advocate
Bureau of Consumer Protection
100 N. Carson Street
Carson City, NV 89701
bcpserv@ag.nv.gov

U.S. MAIL TRANSMITTAL:

Washoe County Clerk
1001 E 9th Street
Reno, NV 89512

ELECTRONIC MAIL

Jennifer Carr
Nevada Division of Environmental Protection
901 S. Stewart Street, Suite 4001
Carson City, NV 89701
Jcarr@ndep.nv.gov

ELECTRONIC MAIL

Staff Counsel Support
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701-3109
Pucn.sc@puc.nv.gov

/s/Cecilia Martin
Cecilia Martin, Legal Secretary
an employee of Holland & Hart LLP

35793161_v1

FILED
SEP 26 2025
JANIS GALASSINI
WASHOE COUNTY CLERK
BY
DEPUTY

NORTH LAKE TAHOE FIRE PROTECTION DISTRICT

BOARD OF DIRECTORS

RESOLUTION NUMBER 25-04

A RESOLUTION ADOPTING THE 2024 LAKE TAHOE NEVADA FIRE CODE, INCORPORATING THE 2024 INTERNATIONAL FIRE CODE, PRESCRIBING REGULATIONS TO PROTECT LIFE AND PROPERTY FROM FIRE, HAZARDOUS MATERIALS, AND EXPLOSIONS, PROVIDING FOR PERMITS, ESTABLISHING A BUREAU OF FIRE PREVENTION, AND DEFINING OFFICERS' POWERS AND DUTIES.

WHEREAS, Nevada Revised Statutes Chapter 474 authorizes a duly organized fire protection district to provide for the prevention and extinguishment of fires; and

WHEREAS, Nevada Revised Statutes Chapter 474 provides that a Board of Directors shall promulgate and enforce all regulations necessary for the administration and government of the district and for the furnishing of fire protection; and

WHEREAS, Nevada Revised Statutes Chapter 474 provides that a Board of Directors shall eliminate and remove fire hazards from the districts wherever practicable and possible, whether on private or public premises; and

WHEREAS, The Board of Directors of the North Lake Tahoe Fire Protection District (NLTFPD) does herewith find that the District has certain climatic, geologic, and topographical features that can have a deleterious or negative effect on the delivery of emergency services such as fire protection and emergency medical services; and

WHEREAS, The Board of Directors of the NLTFPD finds that local modifications and changes to the International Fire Code are reasonably necessary because of the following local climatic, geological, physical, and topographical conditions:

1. **Wildland-Urban Interface and Vegetative Fuels:** the District lies in a mountainous wildland-urban interface area of steep terrain, continuous and dry fuels, and urban development, all of which pose an increasing risk to wildfire spread and conflagration.
2. **Geological Hazards:** proximity to an active fault zone in the Lake Tahoe Basin, the area presents risks of infrastructure failure, including disruption of water, roads, power, and communications during emergencies.
3. **Climatic Conditions:** hot and dry late summer and fall conditions, combined with frequent southwest winds on south facing aspects, heighten the potential exposure of a wildfire ignition, spread, and season. Winter conditions also restrict fire access to not only roadways and properties but also access to fire hydrants and utilities.
4. **Access Limitations:** the topography of the area is generally steep, with most of the subdivisions and structures extending along creek drainages. This terrain may be difficult for firefighters to navigate during a response. Many of these subdivisions have roads that predate modern fire access standards, including steep and narrow roads; a lack of fire turnarounds; and encroachment of public easements. Winter conditions provide these conditions with even more difficult fire access and response.
5. **Environmental Constraints:** Lake Tahoe watershed protections of the area limit roadway improvements, limiting not only improvement in emergency vehicle access but also fuel reduction projects on public lands. These protections also restrict improvements and expansion on the public highways within the Basin. Incline Village and Crystal Bay have only three routes to leave the area. The Lake Tahoe Basin generally has one highway that goes around the Lake.
6. **Limitations of Firefighting Resources:** with only three staffed stations and a small full-time staff, the District relies on mutual aid in both response and in coverage. Mutual aid can be delayed by the lack of routes into the area, distance to the neighboring Fire Districts, and by the road conditions of the season.

WHEREAS, these factors necessitate adopting local amendments to the International Fire Code, including requirements for automatic fire sprinkler systems, to protect life, property, and the natural environment, and to maintain effective emergency response capabilities.

THEREFORE, BE IT RESOLVED:
The Board of Directors of the North Lake Tahoe Fire Protection District hereby adopts the following:

Section 1. ADOPTION OF THE 2024 INTERNATIONAL FIRE CODE.
The North Lake Tahoe Fire Protection District hereby adopts the 2024 International Fire Code (including Appendices A,B, C, D, I, N, and O published by the International Code Council, Inc., together with the 2024 Lake Tahoe Nevada Fire Code local amendments, which are incorporated as a standalone document that supplements and modifies the 2024 IFC as necessary to address local conditions. Three copies of both the 2024 IFC and the local amendments shall be filed with the Washoe County Clerk. From the effective date, the provisions of the 2024 IFC, as modified by the local amendments, shall govern within NLTFPD, including Incline Village and Crystal Bay, Nevada.

Section 2. ESTABLISHMENT AND DUTIES OF BUREAU OF FIRE PREVENTION.
The International Fire Code as adopted and amended herein shall be enforced by the Bureau of Fire Prevention in the Fire District of the North Lake Tahoe Fire Protection District, hereinafter "District", which is hereby established, and which shall be operated under the supervision of the Fire Chief of the Fire District.

The Fire Marshal in charge of the Bureau of Fire Prevention shall be appointed by the Chief of the Fire District on the basis of examination to determine his or her qualifications and shall retain employment as determined by District policy and procedure.

The Chief of the Fire District shall employ a Fire Marshal, Deputies, and Technical Inspectors, who shall be selected through an examination to determine their fitness for the position. The examination shall be open to members and non-members of the Fire District, and appointments made after examination shall retain employment as determined by District policy and procedure.

The Fire Code Official and members of the Fire Prevention Bureau shall have the powers of a police officer in performing their duties under this fire code.

Section 3. REPEAL OF CONFLICTING ORDINANCES.
If any provision herein regarding fire safety conflicts or is inconsistent with former ordinances regarding that same issue, then in that event, the fire code official may enforce the new provision or continue to enforce the prior provision in that officials' sole discretion.

Section 4. VALIDITY.
The North Lake Tahoe Fire Protection District Board of Directors hereby declares that

should any section, paragraph, sentence or word of this ordinance or of the International Fire Code as adopted and amended herein be declared for any reason to be invalid, it is the intent of the North Lake Tahoe Fire Protection District that it would have passed all other portions of this ordinance independent of the elimination here from of any such portion as may be declared invalid, the remainder of the resolution shall remain in force.

Section 5. DATE OF EFFECT.
This ordinance shall take effect and be in force on January 1, 2026, after its approval and filing with the Washoe County Clerk, or as required by law.

Be it further resolved that the Board of Directors of the North Lake Tahoe Fire Protection District voted to accept this resolution as follows:

Passed and adopted this 17th day of September 2025 by the following vote:

Chair

ATTEST:

Clerk

TAHOE FIRE PROTECTION INCLINE VILLAGE OFFICIAL SEAL NEVADA

THE 2024 LAKE TAHOE NEVADA FIRE CODE

INCORPORATING THE 2024 INTERNATIONAL FIRE CODE

Effective January 1, 2026

This publication is a local reference only and does not reproduce ICC or NFPA copyrighted materials. Its purpose is to complement those codes by clarifying local amendments that address the unique topography, geography, and climatic conditions of the Lake Tahoe Basin (Nevada jurisdiction only).

2024 Lake Tahoe Nevada Fire Code

Published by North Lake Tahoe Fire Protection District (NLTFPD) and Tahoe Douglas Fire Protection District (TDFPD)

Introduction

This document contains proposed amendments to the 2024 Edition of the International Fire Code, as published by the International Code Council, Inc., and as further amended by the State of Nevada. These provisions have been additionally amended by the North Lake Tahoe Fire Protection District (NLTFPD) and the Tahoe Douglas Fire Protection District (TDFPD).

This document shall hereafter be referenced as the 2024 Tahoe Nevada Fire Code Amendments. It is prepared for consideration and potential adoption by NLTFPD and TDFPD. Until formally adopted and codified by the respective Fire Districts, the provisions contained herein do not constitute law or enforceable code.

Amendment Conventions:

- For the purposes of these amendments, the term "this code" refers to the 2024 Edition of the International Fire Code (IFC) as published by the International Code Council, Inc.
- The following conventions are used throughout this document to identify modifications to the 2024 IFC:
- Deleted language from the base 2024 IFC is shown in ~~strikethrough.~~
- Added language to the 2024 IFC is shown as <u>underlined.</u>
- In certain instances, the entire text of a section from the 2024 IFC has been restated as amended in order to provide complete context and to ensure clarity of application.

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2024 Lake Tahoe Nevada Fire Code Amendments

Section 101.1 is amended to read:

101.1 Title. These regulations shall be known as the 2024 Lake Tahoe Nevada Fire Code of North Lake Tahoe Fire Protection District (NLTFPD) and Tahoe Douglas Fire Protection District (TDFPD) hereinafter referred to as "this code."

Section 101.2.1 is added to read:

101.2.1 Appendices. Appendices A,B, C, D, I, N, and O are adopted and amended as recorded.

Section 102.7 is amended to read:

102.7 Referenced codes and standards. The codes and standards referenced in this code shall be those that are listed in Chapter 80, and such codes and standards shall be considered to be part of the requirement of this code to the prescribed extent of each such reference and as further regulated by sections 102.7.1 and 102.7.2 or as appropriately determined by the Fire District, with the following exceptions:

a. "International Fuel Gas Code" is deleted and replaced with "NFPA Standard 54/ANSI Z223.1 National Fuel Gas Code, 2024 edition, or the most current version adopted by the Board for the Regulation of Liquified Petroleum Gas in NAC 590.610."
b. "International Plumbing Code" is deleted and replaced with "*2024 Uniform Plumbing Code.*"
c. "International Mechanical Code" is deleted and replaced with "*2024 Uniform Mechanical Code.*"

Section 103.1 is amended to read:

103.1 Creation of agency. NLTFPD and TDFPD are hereby designated as the fire code enforcement agencies, within their respective Fire Districts. The individual charged with the authority and responsibility of this agency shall be known as the Fire Code Official. The purpose of the NLTFPD or TDFPD shall be the implementation, administration, and enforcement of this code and any other applicable fire safety regulations.

Section 103.3 is amended to read:

103.3 Deputies. The Fire Chief, the Fire Code Official, and such members of the Fire Department as duly appointed or deputized shall have the authority to perform duties pursuant to this code, including enforcement of all provisions of the International Fire Code, as adopted and amended by the State of Nevada through Nevada Administrative Code (NAC) 477. Such authority includes the issuance of citations for violations, consistent with NRS 477 and NAC 477.

Section 105.5.22 is amended to read:

105.5.22 Hazardous materials. An operational permit is required to store, transport on-site, dispense, use or handle hazardous material in excess of the amounts listed in Table 105.5.22. When such a permit is required, compliance with the Nevada Combined Agency Hazardous Materials Facility Report (CAHMFR) requirements shall also be demonstrated.

Section 105.5.58 is added to read:

105.5.58 Fire fighter air replenishment systems. An operational permit is required to maintain a fire fighter air replenishment system.

Section 105.5.59 is added to read:

105.5.59 Emergency responder radio coverage system. An operational permit is required for the operation and maintenance of an emergency responder radio coverage system and related equipment, as specified in Section 510.

Section 105.5.60 is added to read:

105.5.60. Energy storage systems. An operational permit is required for stationary or mobile energy storage systems regulated by Section 1207 and NFPA 855.

Section 108.4 is amended to read:

108.4 Work commencing before permit issuance. Any person who initiates work, activity, or operations regulated by this code without first obtaining the required permits shall be subject to fees as specified in the respective Fire District's adopted fee schedule, in addition to the required permit fees.

Section 112.3 and A101.3 are amended to read:

112.3 and 101.3.1. The Fire District's Board of Commissioners or Trustees shall serve as the Board of Appeal.

Section 113.4 is amended to read:

113.4 Violation penalties. Persons who shall violate a provision of this code or shall fail to comply with any of the requirements thereof or who shall erect, install, alter, repair or do work in violation of the approved construction documents or directive of the fire code official, or of a permit or certificate issued under the provisions of this code, shall be guilty of a misdemeanor, punishable by either the fee schedule adopted by the respective Fire District or imprisonment not exceeding 180 days or a combination of both. The respective Fire District is authorized to issue administrative citations for violations of not only the adopted codes and standards, but also any related fire safety statutes and administrative code pursuant to Nevada Law.

Section 113.4.1 is amended to read:

113.4.1 Abatement of violation. Pursuant to Nevada Revised Statute (NRS 474.580), as permitted, the Fire District may eliminate and remove a fire hazard and contract with any person for the performance of this work. The Fire District may recover reasonable and documented costs associated with enforcement and abatement of work, including costs of labor and equipment, administrative, legal, and investigative material, disposal or related charges. Abatement for such work shall comply as follows:

1. Written notice of the intent to abate shall be provided to the property owner.
2. A reasonable opportunity for the property owner or representative to respond shall be given.
3. If entry is denied, a warrant shall be obtained unless emergency conditions exist. In emergency situations involving imminent threat to public safety, warrantless entry is authorized during exigency.
4. Abatement actions shall be documented. Post-abatement notice with an itemized invoice shall be provided to the property owner.

Section 113.5 is added to read:

113.5 Escalation of enforcement. In addition to abatement, the Fire District may take further action if a violation is not corrected or abated, such as:

1. Issue additional fines.
2. Request judicial enforcement and penalties.
3. Claim a property lien pursuant to NRS Chapter 318 or applicable legislation, following proper notice and hearing procedures.

Definition is amended to read:

Chapter 2 Definition is added to read:

Chapter 2 DEFINITION BUILDING LEVEL. For the sole purpose of determining when fire sprinklers and alarms are required, any level of a building served by a stairway containing eight (8) or more risers leading to an intermediate floor or landing shall be considered a separate story (level), regardless of designation or use. This definition shall not alter or affect the definition of story or level elsewhere in the International Fire Code (IFC) or International Building Code (IBC).

Chapter 2 Definition is amended to read:

Chapter 2 DEFINITION HIGH-RISE BUILDING. A building with an occupied floor located more than ~~75~~ 55 feet (~~22,806~~ 16,764 mm) above the lowest level of fire department vehicle access.

Chapter 2 Definition is amended to read:

Chapter 2 DEFINITION Fire Watch. A fire watch is a temporary measure implemented by qualified individuals, and approved by the Fire Code Official, to ensure continuous and systematic surveillance of a building or property when, in the opinion of the Fire Code Official, conditions exist that present a distinct hazard to life or property. These conditions include but are not limited to:

1. Inadequate or impaired means of egress.
2. Structural damage or hazardous conditions.
3. Fire protection systems that are impaired, nonfunctional, or out-of-service.

Chapter 2 Definition is added to read:

Chapter 2 DEFINITION UNWANTED ALARM. Any alarm that occurs that is not the result of a potentially hazardous condition.

Section 203.7.2 *is amended to read:*

203.7.2 Institutional Group I-2. Institutional Group I-2 occupancy shall include buildings and structures used for medical care on a 24-hour basis for more than ~~five~~ six persons who are incapable of self-preservation. *All portions of a care facility which houses patients or residents which are classified by the State Board of Health as a 'Category 2 resident' and which has an occupant load of more than 10 residents, is classified as an 'I-2' occupancy classification.* This group shall include, but not limited to, the following:

- Foster care facilities
- Detoxification Facilities
- Hospitals
- Nursing homes
- Psychiatric Hospitals

Sections 307.4.1 through 307.4.3 have been deleted and amended as follows:

307.4.1 through 307.4.3 Burn restrictions. All open burning, recreational fires, and portable outdoor fireplaces, including gas fire pits and BBQs or ovens, etc. shall require an operational burn permit with the respective Fire District. Recreational fires are not permitted on short-term or vacation home rentals.

> Exceptions: An operational permit is not required for portable BBQs or ovens with a grill area ≤ 9 sq. ft., unless otherwise required by county ordinances or authorized agencies.

Section 308.1.7 is amended to read:

308.1.7 Sky lanterns. ~~A person shall not release or cause to be released an untethered sky lantern~~. Sky lanterns are prohibited.

Section 403.11.3 is amended to read:

403.11.3 Crowd Managers. Where facilities or events involve a gathering of more than 500 people or 100 people in Group A-2 occupancies operating as a nightclub, tavern, or bar, crowd managers shall be provided in accordance with sections 403.11.3.1 through 403.11.3.3.

Section 503.3 is amended to read:

503.3 Marking. Where required by the fire code official, ~~approved signs or other approved notices or markings that include the words "No Parking—Fire Lane" shall be provided for fire apparatus access roads to identify such roads or prohibit the obstruction thereof~~ fire lanes shall be marked or posted by an approved means of the Fire District, including but not limited to painted or marked fire access lanes or approved signage. Signs shall be posted at intervals of every 100 feet, or as otherwise determined by the Fire District. Striping on the road surface, edge curb and gutter, or similar surfaces may be required by the Fire Code Official when deemed necessary. The Fire District is authorized to require the installation of signage, pavement markings, or striping along fire apparatus access roads and evacuation routes to enhance fire safety, emergency access, or public evacuation. Such signage and markings shall be designed, located, and maintained in a manner deemed appropriate by the Fire Chief, considering site conditions, visibility, and public safety needs. The means by which fire lanes are designated shall be maintained in a clean and legible condition at all times and be replaced or repaired when necessary to provide adequate visibility.

Section 505.1 is amended to read as follows:

505.1 Address identification. New and existing buildings shall be provided with approved maintained all-weather address identification. The address identification shall be legible and placed in a position that is visible from the street or road fronting the property. Address identification characters shall contrast with their background. Address numbers shall be Arabic numbers or alphabetic letters. Numbers shall not be spelled out. Each character shall be not less ~~than 4 inches (102 mm) high with a minimum stroke width of ½ inch (12.7 mm)~~ than a nominal height of 6 inches with a minimum ½ inch stroke for residential occupancies and 12 inches with a 1-inch stroke in commercial occupancies, unless otherwise approved by the *fire code official.* Where required by the *fire code official,* address identification shall be provided in additional approved locations to facilitate emergency response. Where access is by means of a private road and the building cannot be viewed from the public way, a monument, pole, or other sign or means shall be used to identify the structure. Address identification shall be maintained.

Section 507.3 is amended to read as follows:

507.3 Fire Flow. Fire flow requirements for buildings or portions of buildings and facilities shall be determined by an *approved* method. Subject to the approval of the fire authority, if the required fire flow is not available for adequate fire protection, an automatic fire sprinkler system shall be installed

throughout the building or buildings. The sprinkler system must meet the requirements of the appropriate NFPA standard. The provisions of this paragraph do not apply if a fire sprinkler system is otherwise required by this chapter or the adopted codes. Calculations shall be based on the total building area.

Section 507.5.5 is amended to read as follows:

507.5.5 Clear space around hydrants. A 3 foot (914 mm) clear space shall be maintained around the circumference of fire hydrants, except as otherwise approved. Clear space shall be maintained from hydrant to the paved fire access area. Hydrants shall not be obstructed by any means. An approved fire hydrant sign shall be installed for all fire hydrants.

Section 508.1.6 is amended to read as follows:

508.1.6 Required features. The fire command center shall comply with NFPA 72 and shall contain all features as required by the 2024 IFC, with an addition of:

19. The central control station shall be provided with heating, cooling, and ventilation (HVAC) systems that are independent of any other building system or area. HVAC for the central control station shall be connected to the emergency power system.
20. Lighting shall provide adequate illumination and shall be on emergency service with additional battery backup emergency lighting.
21. A telephone connected to the premises telephone exchange shall be provided. A current premises telephone directory shall be placed next to this telephone.
22. The main switch for disconnecting the utility power and any alternate power sources shall be in the fire command center. Switches shall be covered to prevent utility power feeds and any alternate power sources before entering the building. After the switch is operated, no live electrical panels, conductors, or feeds within the premises shall remain energized excluding the emergency electrical circuits.

Section 509.2 has been amended to read:

509.2 Equipment access. Approved access shall be provided and maintained for all fire protection equipment and utility equipment and/or rooms. Storage, trash, and other materials or objects shall not be placed or kept in such areas. Natural gas meter risers shall be provided with a protective cover that is approved by the respective gas utility company.

Section 510.1 is amended to read:

510.1 Emergency responder communication enhancement system (ERCES) in new buildings. Approved in-building emergency responder communication enhancement system for emergency responders (ERCES) shall be provided in all new buildings. In-building ERCES within the building shall be based on the existing coverage levels of the public safety communication systems utilized by the jurisdiction, measured at the exterior of the building. The ERCES, where required, shall be of the type determined by the fire code official and the frequency license holder(s). This Section shall not require improvement of the existing public safety communication system.

Exceptions:

1. Where approved by the building code official and the fire code official, a wired communications system in accordance with Section 907.2.13.2 shall be permitted to be installed or maintained instead of an approved communications coverage system.
2. Where it is determined by the fire code official that the communication coverage system is not needed after a technical report has been provided, following the acceptance procedures in 510.5.4.
3. In facilities where emergency responder communications coverage is required and such systems, components, or equipment required could have a negative impact on the normal operations of that facility, the fire code official authority to accept an automatically activated emergency responder communications coverage system.
4. One-story buildings not exceeding 12,000 square feet with no below-ground area(s).

Section 603.10 has been added to read:

603.10 Service disconnect location. An approved electrical service disconnect, also known as an electrical shunt, shall be installed in a readily accessible location. The disconnect shall simultaneously de-energize all electrical circuits on the premises, including backup power systems, emergency pumps, solar photovoltaic systems, battery storage, and other auxiliary power sources, with a single action.

Section 901.11 is added to read:

901.11 Unwanted fire alarms. Unwanted fire alarms are a violation of this code. If a fire alarm system is installed, it shall be the responsibility of the property owner or owner's authorized agent to maintain the system and properly educate occupants, tenants, and/or employees in accepted behavioral practices that will minimize or eliminate false and/or nuisance alarms. This includes nuisance activations in response to predictable environmental stimuli such as but not limited to cooking fumes, smoking, and construction activities. Where unwanted alarms become repetitive, the fire code official is authorized to charge fees or issue administrative citations to the property owner in accordance with the fee schedule or administrative code as established by the respective Fire District.

Section 903.2 is amended to read:

903.2 Where required. Approved automatic sprinkler systems in new, altered, or modified structures shall be provided in the locations described in Sections 903.2.1 through 903.2.12 or if the allowable fire area and building height is exceeded or if the nearest hydrant has a deficient fire flow, per Table 903.2.

Exception: when the structure is only altering or modifying a portion of the total fire area. Additions that exceed the allowable fire area per Table 903.2 or that exceed the required fire flow or that create three (3) levels or more are required to install fire sprinklers.

Table 903.2 is added to read:

Table 903.2

Required automatic sprinklers by fire area, building levels, and fire flow for buildings designed and constructed with the *International Building Code, International Residential Code, Existing Building Code*, including A, B, E, F, H, I, M, R, S, and U occupancies. Sprinklers are required when any one of the listed conditions are met or when otherwise required by this code.

Fire District	Fire Flow	Building Levels	Fire Area
NLTFPD	Deficient	3 building levels or greater	5000 sq ft
TDFPD	Deficient	3 building levels or greater	3600 sq ft

Table 903.2 notes:

A. This table is in addition to other automatic sprinkler requirements in this code or other adopted codes, such as the International Wildland Urban Interface Code.
B. Fire areas may be separated accordingly to International Building Code, unless the building is being designed to the International Residential Code.
C. Any addition or remodel that increases the fire area will be included in the calculation for the total square footage.
D. For buildings that are designed to the International Residential Code, a one-time increase of 360 square feet in the fire area shall be permitted.
E. For buildings that are designed to the International Residential Code, fire sprinkler design criteria shall be NFPA 13R for NLTFPD and NFPA 13D for TDFPD.
F. For buildings that are designed to the International Residential Code, buildings that exceed 10,000 (ten thousand) sq ft or exceed four (4) building levels, shall have a fire sprinkler system designed to NFPA 13.
G. For NLTFPD NFPA 13R installations requiring a fire pump, an NFPA 13D pump is permitted when interconnected to an NFPA 72 compliant alarm system, provided the single-family residential occupancy (R-3) does not exceed four (4) building levels or 10,000 sq. ft.
H. For this table, a building level is defined as any level of a building served by a stairway with eight (8) or more risers leading to an intermediate floor or landing. Where stairways with eight (8) or more risers provide access to an intermediate level, that level shall be considered a separate story (building level), regardless of its designation or use. Stairways providing access exclusively to an uninhabitable, non-heated garage classified as Group U occupancy shall be exempt from this requirement.
I. NFPA 13 sprinkler systems are required for all Group R-1 and R-2 occupancies exceeding two (2) building levels in height.
J. All fire sprinkler systems installed in accordance with NFPA 13R and NFPA 13D shall provide complete sprinkler coverage in attached and detached garages.

Section 903.2.3 is amended to read as follows:

903.2.3 Group E. An *automatic sprinkler system* shall be provided for Group E occupancies ~~as follows~~ where one of the following exists:

1. Throughout all Group E *fire areas* greater than ~~12,000~~ 5,000 square feet (~~1,115~~ 464 m^2) in area.
2. The Group E fire area is located on a floor other than a level of exit discharge serving such occupancies.

   Exception: In buildings where every classroom has not fewer than one exterior exit door at ground level, an automatic sprinkler system is not required in any area below the lowest level of exit discharge serving that area.
3. Group E fire area has an occupant load of 300 or more.
4. Daycare facilities where there is occupancy from 12:00 am – 6:00 am and care for 7 or more children.

In high schools where *automatic fire sprinkler systems* are provided, the automatic fire sprinkler systems for automotive and woodworking shops must be *designed* to Ordinary Hazard, Group 1 automatic fire sprinkler systems *criteria, or as required* by the Authority Having Jurisdiction.

Section 903.4.3 is amended to read:

903.4.3 Alarms. An approved audible and visual sprinkler waterflow alarm device, located on the exterior of the building, shall be connected to each automatic sprinkler system. Such sprinkler water flow alarm device shall be activated by water flow equivalent to the flow of a single sprinkler of the smallest orifice size installed in the system. In addition, approved alarm notification appliances shall be provided within each tenant space on the interior in approved locations. For one- and two-family dwellings, the waterflow alarm device shall activate the required smoke alarms or an approved alarm notification appliance on each level.

Section 907.2.9.4 is added to read as follows:

907.2.9.4 Automatic smoke detection system in Group R-4. An automatic smoke detection system that activates the occupant notification system in accordance with Section 907.5 shall be installed in *corridors*, waiting areas open to *corridors* and *habitable spaces* other than *sleeping units* and kitchens.

Exceptions:

1. Smoke detection in *habitable spaces* is not required where the facility is equipped throughout with an *automatic sprinkler system* installed in accordance with Section 903.3.1.1.
2. An automatic smoke detection system is not required in buildings that do not have interior *corridors* serving *sleeping units* and where each *sleeping unit* has a *means of egress* door opening directly to an exit or to an exterior *exit access* that leads directly to an exit.

907.2.11.7.1 is added to read as follows:

907.2.11.7.1 Groups R-3. An NFPA 72 monitored fire alarm system shall be installed if any of the follow conditions occur:

1. NLTFPD: A monitored fire alarm system shall be required if any of the following conditions are met:
    - If the occupancy exceeds 10,000 square ft. or unless otherwise required by county ordinances or authorized agencies.

2. TDFPD: A monitored fire alarm system shall be required if any of the following conditions are met:
    - The occupancy exceeds 10,000 square feet;
    - The building is located more than 1,000 feet from a fire hydrant;
    - The property is a vacation home rental with three (3) or more building levels;
    - The vacation home rental accommodates 10 or more occupants;
    - The vacation home rental is attached to other dwelling units, such as apartments, condominiums, duplexes, or townhome.

Section 5601.1.6 is added to read as follows:

5601.1.6 Exploding targets. The possession, manufacture, sale, and use of exploding targets, including binary exploding targets, are prohibited.

Section 6101.2 is amended with added note

6101.2 Permits. Stationary outdoor LP storage tanks are prohibited in Wildland Urban Interface areas, unless specifically permitted by the Fire District.

Concluding Statement

This document concludes the 2024 Lake Tahoe Nevada Fire Code Amendments.

These provisions amend, delete, or supplement the 2024 International Fire Code (IFC), as published by the International Code Council. All sections of the IFC not specifically amended, deleted, or replaced herein shall remain in full force and effect as adopted.

These amendments shall take effect upon adoption and codification by the respective Boards of Commissioners/Trustees of the North Lake Tahoe Fire Protection District (NLTFPD) and the Tahoe Douglas Fire Protection District (TDFPD).

End

FILED
SEP 26 2025
JANIS GALASSINI
WASHOE COUNTY CLERK
BY
DEPUTY

NORTH LAKE TAHOE FIRE PROTECTION DISTRICT

BOARD OF DIRECTORS

RESOLUTION NUMBER 25-05

A RESOLUTION ADOPTING THE 2024 LAKE TAHOE NEVADA WILDLAND-URBAN INTERFACE CODE, INCORPORATING THE 2024 INTERNATIONAL WILDLAND-URBAN INTERFACE CODE, PRESCRIBING REGULATIONS TO PROTECT LIFE AND PROPERTY FROM FIRE, HAZARDOUS MATERIALS, AND EXPLOSIONS, PROVIDING FOR PERMITS, ESTABLISHING A BUREAU OF FIRE PREVENTION, AND DEFINING OFFICERS' POWERS AND DUTIES.

WHEREAS, Nevada Revised Statutes Chapter 474 authorizes a duly organized fire protection district to provide for the prevention and extinguishment of fires; and

WHEREAS, Nevada Revised Statutes Chapter 474 provides that a Board of Directors shall promulgate and enforce all regulations necessary for the administration and government of the district and for the furnishing of fire protection; and

WHEREAS, Nevada Revised Statutes Chapter 474 provides that a Board of Directors shall eliminate and remove fire hazards from the districts wherever practicable and possible, whether on private or public premises; and

WHEREAS, The Board of Directors of the North Lake Tahoe Fire Protection District (NLTFPD) does herewith find that the District has certain climatic, geologic, and topographical features that can have a deleterious or negative effect on the delivery of emergency services such as fire protection and emergency medical services; and

WHEREAS, The Board of Directors of the NLTFPD finds that local modifications and changes to the International Wildland-Urban Interface Code are reasonably necessary

because of the following local climatic, geological, physical, and topographical conditions:

1. **Wildland-Urban Interface and Vegetative Fuels:** the District lies in a mountainous wildland-urban interface area of steep terrain, continuous and dry fuels, and urban development, all of which pose an increasing risk to wildfire spread and conflagration.
2. **Geological Hazards:** proximity to an active fault zone in the Lake Tahoe Basin, the area presents risks of infrastructure failure, including disruption of water, roads, power, and communications during emergencies.
3. **Climatic Conditions:** hot and dry late summer and fall conditions, combined with frequent southwest winds on south facing aspects, heighten the potential exposure of a wildfire ignition, spread, and season. Winter conditions also restrict fire access to not only roadways and properties but also access to fire hydrants and utilities.
4. **Access Limitations:** the topography of the area is generally steep, with most of the subdivisions and structures extending along creek drainages. This terrain may be difficult for firefighters to navigate during a response. Many of these subdivisions have roads that predate modern fire access standards, including steep and narrow roads; a lack of fire turnarounds; and encroachment of public easements. Winter conditions provide these conditions with even more difficult fire access and response.
5. **Environmental Constraints:** Lake Tahoe watershed protections of the area limit roadway improvements, limiting not only improvement in emergency vehicle access but also fuel reduction projects on public lands. These protections also restrict improvements and expansion on the public highways within the Basin. Incline Village and Crystal Bay have only three routes to leave the area. The Lake Tahoe Basin generally has one highway that goes around the Lake.
6. **Limitations of Firefighting Resources:** with only three staffed stations and a small full-time staff, the District relies on mutual aid in both response and in coverage. Mutual aid can be delayed by the lack of routes into the area, distance to the neighboring Fire Districts, and by the road conditions of the season.

WHEREAS, these factors necessitate adopting local amendments to the International Wildland-Urban Interface Code (IWUIC), including requirements for automatic fire sprinkler systems, to protect life, property, and the natural environment, and to maintain effective emergency response capabilities.

THEREFORE, BE IT RESOLVED:

The Board of Directors of the North Lake Tahoe Fire Protection District hereby adopts the following:

Section 1. ADOPTION OF THE 2024 WILDLAND-URBAN INTERFACE CODE.

The North Lake Tahoe Fire Protection District hereby adopts the Wildland-Urban Interface Code A and B published by the International Code Council, Inc., together with the 2024 Lake Tahoe Nevada Wildland-Urban Interface Code local amendments, which are incorporated as a standalone document that supplements and modifies the 2024 IWUIC as necessary to address local conditions. Three copies of both the 2024 IWUIC and the local amendments shall be filed with the Washoe County Clerk. From the effective date, the provisions of the 2024 IWUIC, as modified by the local amendments, shall govern within NLTFPD, including Incline Village and Crystal Bay, Nevada.

Section 2. ESTABLISHMENT AND DUTIES OF BUREAU OF FIRE PREVENTION.

The Wildland-Urban Interface Code as adopted and amended herein shall be enforced by the Bureau of Fire Prevention in the Fire District of the North Lake Tahoe Fire Protection District, hereinafter "District", which is hereby established, and which shall be operated under the supervision of the Fire Chief of the Fire District.

The Fire Marshal in charge of the Bureau of Fire Prevention shall be appointed by the Chief of the Fire District on the basis of examination to determine his or her qualifications and shall retain employment as determined by District policy and procedure.

The Chief of the Fire District shall employ a Fire Marshal, Deputies, and Technical Inspectors, who shall be selected through an examination to determine their fitness for the position. The examination shall be open to members and non-members of the Fire District, and appointments made after examination shall retain employment as determined by District policy and procedure.

The Fire Code Official and members of the Fire Prevention Bureau shall have the powers of a police officer in performing their duties under this fire code.

Section 3. REPEAL OF CONFLICTING ORDINANCES.

If any provision herein regarding fire safety conflicts or is inconsistent with former ordinances regarding that same issue, then in that event, the fire code official may enforce the new provision or continue to enforce the prior provision in that officials' sole discretion.

Section 4. VALIDITY.

The North Lake Tahoe Fire Protection District Board of Directors hereby declares that should any section, paragraph, sentence or word of this ordinance or of the

International Fire Code as adopted and amended herein be declared for any reason to be invalid, it is the intent of the North Lake Tahoe Fire Protection District that it would have passed all other portions of this ordinance independent of the elimination here from of any such portion as may be declared invalid, the remainder of the resolution shall remain in force.

Section 5. DATE OF EFFECT.
This ordinance shall take effect and be in force on January 1, 2026, after its approval and filing with the Washoe County Clerk, or as required by law.

Be it further resolved that the Board of Directors of the North Lake Tahoe Fire Protection District voted to accept this resolution as follows:

Passed and adopted this 17th day of September 2025 by the following vote:

Chair

ATTEST:

Clerk



THE 2024 LAKE TAHOE NEVADA WILDLAND-URBAN INTERFACE CODE

INCORPORATING THE 2024 INTERNATIONAL WILDLAND-URBAN INTERFACE





This publication is a local reference only and does not reproduce ICC or NFPA copyrighted materials. Its purpose is to complement those codes by clarifying local amendments that address the unique topography, geography, and climatic conditions of the Lake Tahoe Basin (Nevada jurisdiction only).

2024 Lake Tahoe Nevada Wildland-Urban Interface Code

Published by North Lake Tahoe Fire Protection District (NLTFPD) and Tahoe Douglas Fire Protection District (TDFPD)

Introduction

This document contains proposed amendments to the 2024 Edition of the International Wildland-Urban Interface Code, as published by the International Code Council, Inc., and as further amended by the State of Nevada. These provisions have been additionally amended by the North Lake Tahoe Fire Protection District (NLTFPD) and the Tahoe Douglas Fire Protection District (TDFPD).

This document shall hereafter be referenced as the 2024 Tahoe Nevada Fire Code Amendments. It is prepared for consideration and potential adoption by NLTFPD and TDFPD. Until formally adopted and codified by the respective Fire Districts, the provisions contained herein do not constitute law or enforceable code.

Amendment Conventions:
The following conventions are used throughout this document to identify modifications to the 2024 International Wildland-Urban Interface Code (IWUIC):

- Deleted language from the base 2024 IWUIC is shown in ~~strikethrough.~~
- Added language to the 2024 IWUIC is shown as <u>underlined</u>.
- In certain instances, the entire text of a section from the 2024 IWUIC has been restated as amended in order to provide complete context and to ensure clarity of application.

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2024 Lake Tahoe Nevada Wildland-Urban Interface Code Amendments

Section 101.1 is amended to read:

101.1 Title. These regulations shall be known as the 2024 Lake Tahoe Nevada Wildland-Urban Interface Code of North Lake Tahoe Fire Protection District (NLTFPD) and Tahoe Douglas Fire Protection District (TDFPD) hereinafter referred to as "this code."

Section 101.2.1 is amended to read:

101.2.1 Appendices. Appendices A and B are adopted and amended as recorded.

Section 101.5 is amended to read:

101.5 Additions or alterations. Additions or alterations shall be permitted to be made to any building or structure without requiring the existing building or structure to comply with all of the requirements of this code, provided that the addition or alteration conforms to that required for a new building. Exceptions: Provisions of this code that specifically apply to existing conditions are retroactive.

Exception (s):

1. Roof Coverings, if the roof covering is replaced or more than 25% of the roof area (or 100 sq ft or more) is replaced within a 12-month period, it shall be replaced with ignition-resistant construction.
2. Exterior Walls, if more than 25% of the exterior wall covering is replaced, it shall be replaced with ignition-resistant construction.
3. Decks, if more than 25% of the deck covering is replaced, it shall be replaced with ignition-resistant construction.

Section 108.4 is amended to read:

108.4 Work commencing before permit issuance. Any person who initiates work, activity, or operations regulated by this code without first obtaining the required permits shall be subject to fees and a stop work order, as specified in the respective Fire District's adopted fee schedule and amendments, which shall be in addition to the required permit fees.

109.3.7 is amended to read:

109.3.7 Violation penalties. Persons who shall violate a provision of this code or shall fail to comply with any of the requirements thereof or who shall erect, install, alter, repair or do work in violation of the approved construction documents or directive of the fire Code Official, or of a permit or certificate used under the provisions of this code, shall be guilty of a misdemeanor, punishable by either the fee schedule adopted by the respective Fire District or imprisonment not exceeding 180 days or a combination of both. The respective Fire District is authorized to issue administrative citations for violations of not only the adopted codes and standards, but also any related fire safety statutes and administrative code pursuant to Nevada Law.

Section 109.3.8 is amended to read:

109.3.8 Abatement of violation. Pursuant to Nevada Revised Statute (NRS 474.580), as permitted, the Fire District may eliminate and remove a fire hazard and contract with any person for the performance of this work. The Fire District may recover reasonable and documented costs associated with enforcement and abatement of work, including costs of labor and equipment, administrative, legal, and investigative material, disposal or related charges. Abatement for such work shall comply as follows:

1. Written notice of the intent to abate shall be provided to the property owner.
2. A reasonable opportunity for the property owner or representative to respond shall be given.
3. If entry is denied, a warrant shall be obtained unless emergency conditions exist. In emergency situations involving imminent threat to public safety, warrantless entry is authorized during exigency.
4. Abatement actions shall be documented. Post-abatement notice with an itemized invoice shall be provided to the property owner.

Section 109.3.9 is added to read:

109.3.9 Escalation of enforcement. In addition to abatement, the Fire District may take further action if a violation is not corrected or abated, such as:

1. Issue additional fines.
2. Request judicial enforcement and penalties.
3. Claim a property lien pursuant to NRS Chapter 318 or applicable legislation, following proper notice and hearing procedures.

Section 112.3 is amended to read:

112.3. The Fire District's Board of Commissioners or Trustees shall serve as the Board of Appeal.

Definitions are amended to read:

Chapter 2 DEFINITIONS FIRE-RESISTANT VEGETATION. *Plants, shrubs, trees and other vegetation that exhibit properties, such as high moisture content, little accumulation of dead vegetation, and low sap or resin content, that make them less likely to ignite or contribute heat or spread flame in a fire than native vegetation typically found in the region. Note: The following sources contain examples of types of vegetation that can be considered as fire-resistant vegetation. (Fire-resistant Plants for Home Landscapes, A Pacific Northwest Extension publication; Home Landscaping for Fire, University of California Division of Agriculture and Natural Resources; Sunset Western Garden Book).*

Chapter 2 DEFINITIONS Heavy Timber Construction. As described in the *International Building Code.* For Decks and similar projections, construction shall be as follows: Minimum 6x6 columns; 4x8 floor joists; 4x10 or 6x8 beams; 3x ledgers; and 2x decking.

Section 302.3 is amended to read:

302.3 Review of wildland-urban interface areas. The Code Official shall reevaluate and recommend modification to the *wildland-urban interface areas* in accordance with Section 302.1 ~~on a 3-year basis or more frequently as deemed necessary by the legislative body~~ as deemed necessary.

Section 404.5 is amended to read:

404.5 Adequate water supply. Adequate water supply shall be determined for purposes of initial attack and flame front control as follows:

1. One- and two-family dwellings. The required water supply for one-and two-family dwellings having a fire flow calculation area that does not exceed 3.600 square feet (334 m^2) shall be 1,000 gallons per minute (63.1 L/s) for a minimum duration of 30 minutes. The required fire flow supply for one- and two-family dwellings having a flow calculation area in excess of 3,600 square feet (334 m^2) shall be 1,500 gallons per minute (95 L/s) for a minimum duration of 30 minutes.

   Exception: A reduction in required flow rate of 50 percent, as approved by the Code Official, is allowed where the building is provided with an approved automatic sprinkler system.

2. Buildings other than one- and two-family dwellings. The water supply required for buildings other than one- and two-family dwellings shall be as approved by the Code Official but shall not be less than 1,500 gallons per minute (95 L/s) for a duration of 2 hours.

   Exception: A reduction in required flow rate of up to ~~75~~ 50 percent, as approved by the Code Official, is allowed where the building is provided with an approved automatic sprinkler system. The resulting water supply shall not be less than 1,500 gallons per minute (94.6 L/s).

Section 501.2 is amended to read:

501.2 Objective. The objective of this chapter is to establish minimum standards to locate, design and construct buildings and structures or portions thereof for the protection of life and property, to resist damage from wildfires, and to mitigate building and structure fires from spreading to wildland fuels. The minimum standards set forth in this chapter vary with the critical *fire weather*, slope and fuel type to provide increased protection, above the requirements set forth in the *International Building Code* and the *International Residential Code*, from the various levels of hazards.

Section 502 is deleted in its entirety.

Table 503.1 is amended to read:

503.1 General. Buildings and structures hereafter constructed, modified or relocated into or within ~~the wildland-urban interface areas~~ the respective Fire District shall meet IR1 construction. Materials required to meet IR1 construction shall comply with the requirements of Section 503.2 and 504 within the scope of work.

Section 504.7.2 is added to read:

504.7.2 Decks. All decks shall be constructed with the following, 0.25 inch deck board spacing with foil-faced bitumen tape or corrosion-resistant metal applied to the top and upper 2 inches of the side surfaces of the combustible supporting joist.

Table 603.2 is deleted, and Section 603.2 is amended to read:

603.2 Fuel modification. New and existing structures shall comply with defensible space, as prescribed by the respective Fire District, following their approved guidelines and sections in this chapter. The fuel modification area within the defensible space shall be no less than 100' from the building's exterior elements or to the property line, whichever comes first.

Section 603.2. is deleted in its entirety.

Section 603.2.2 is amended to read:

603.2.2 Trees. Trees are allowed within defensible space, provided the ~~horizontal~~ distance between crowns of adjacent trees and crowns of trees and structures, overhead electrical facilities or unmodified fuel is not less than 10 feet (3048 mm) or an acceptable distance as determined by the Code Official. Tree crowns within the *defensible space* shall be pruned to remove limbs located less than 10 feet (3048 mm) above the ground surface adjacent to the trees; or an acceptable distance as determined by the Code Official.

Section 603.2.4 is added to read:

603.2.4 Noncombustible area. The area extending from the base of any structure to 5 feet beyond the base of such structure shall be composed entirely of noncombustible material or fire resistive vegetation.

Section 604.4 is amended to read:

604.4 Trees. Trees are allowed within the *defensible space*, provided the distance between crowns of adjacent trees and crowns of trees and structures, overhead electrical facilities or unmodified fuel is not

less than 10 feet (3048 mm) or an acceptable distance as determined by the Code Official. Tree crowns within the *defensible space* shall be pruned to remove limbs located less than 10 feet (3048 mm) above the ground surface adjacent to the trees; or an acceptable distance as determined by the Code Official.

Section 604.4.1 is amended to read:

604.4.1 Chimney clearance. Portions of tree crowns that extend to within 10 feet (3048 mm) of the outlet of a chimney shall be pruned to maintain a minimum ~~horizontal~~ clearance of 10 feet (3048 mm).

Section 604.5 is added to Section 604 to read:

604.5 Non-combustible area. The area extending from the base of any structure to 5 feet beyond the base of such structure shall be composed entirely of non-combustible material or fire resistive vegetation.

Section 607.1 is amended to read:

607.1 General. Firewood and combustible material shall not be stored in unenclosed spaces beneath buildings or structures, or on decks or under eaves, canopies or other projections or overhangs. When required by the Fire District, storage of firewood and combustible material stored in the *defensible space* shall be located a minimum of ~~20~~ 30 feet (~~6096~~ 9144 mm) from structures and separated from the crown of trees by a minimum horizontal distance of 15 feet (4572 mm).

Exception. Approved fire-resistance-rated coverings used in accordance with their listing and as approved and allowed by the respective Fire District.

Section A104.7.1 amended to read:

A104.7.1 General. Persons shall not build, ignite or maintain any outdoor fire of any kind for any purpose in or on any *wildland-urban interface area*, except by the authority of a written permit from the respective Fire District.

~~Exception: Outdoor fires within inhabited premises or designated campsites where such fires are in a permanent barbeque, outdoor fireplace, incinerator or grill and are not less than 30 feet from any combustibles or nonfire-resistive vegetation~~

Section B101.1 is amended to read:

B101.1 Scope. Where required, vegetation management plans shall be submitted to the Code Official for review and approval as part of the plans required for a permit or when required by the Fire District.

Section B101.2 is amended and added to read:

B101.2 Plan content. Vegetation management plans shall describe all actions that will be taken to prevent a fire from being carried toward or away from the building. A vegetation management plan shall include at least the following information:

1. A copy of the ~~site~~ *vegetation management* plan.

2. Methods and timetables for controlling, changing or modifying areas on the property. Elements of the plan shall include removal of slash, snags, vegetation that may grow into overhead electrical lines, other ground fuels, ladder fuels and dead trees, and the thinning of live trees.

3. A plan for maintaining the proposed fuel-reduction measures.

4. Current and proposed structures.

5. Existing trees and other vegetation, including brush fields.

6. Property boundaries.

7. Roads, driveways, and fire department access.

8. Special requirements as requested by the Fire District

Chapter 7 is amended to add NFPA 1140:

2022 NFPA 1140, Standard for Wildland Fire Protection Section 11.4.2, Section 11.4.3, and Section 14.2.1.6.4 of NFPA 1140 (2022 Edition), *Standard for Wildland Fire Protection*, are hereby adopted and incorporated by reference for limited application for new construction.

Concluding Statement
This document concludes the 2024 Lake Tahoe Nevada Wildland-Urban Interface Code Amendments.

These provisions amend, delete, or supplement the 2024 IWUIC, as published by the International Code Council. All sections of the IFC not specifically amended, deleted, or replaced herein shall remain in full force and effect as adopted.

These amendments shall take effect upon adoption and codification by the respective Boards of Commissioners/Trustees of the North Lake Tahoe Fire Protection District (NLTFPD) and the Tahoe Douglas Fire Protection District (TDFPD).

Outlook

Verdi Television District AB301 Compliance Documents

From Verdi TV District <verditvdistrict@gmail.com>
Date Wed 10/1/2025 7:58 AM
To Hill, Alexis <AHill@washoecounty.gov>
Cc Ellison, Brandy A. <BEllison@washoecounty.gov>; St. Jacques, Diane <DStJacques@washoecounty.gov>

11 attachments (3 MB)

2025 Annual Fiscal Report.pdf; 2024 Verdi Television District Financial Statement.pdf; 2025-02 Annual audit report.pdf; 2025-02-27 Approved Meeting Minutes.pdf; 2025-03 Exempt approval letter FY26.pdf; 2025-04-10 DRAFT Meeting Minutes .pdf; CNA Surety Bond.pdf; License Status.pdf; Recommendation for Continuation and Statement of Importance.pdf; Status of Equipment.pdf; FY2026 Budget.pdf;

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Report Suspicious

Dear Commissioner Hill,

Attached is the information required by AB301. Let me know if I have missed anything. Please acknowledge receipt of this email. Thank you.

Kind regards,

Michelle Zunino, Secretary
Verdi Television District
P.O. Box 214
Verdi, NV 89439-0214
verditvdistrict@gmail.com
Cell: 775-846-1178
Office: 775-357-8676

Verdi TV District

P.O. Box 214 Verdi, NV 89439 165 Bridge Street, Verdi, NV 89439

VERDI TV DISTRICT
Proprietary fund
Fiscal Report

	ACTUAL PRIOR YEAR ENDING **6/30/2024**	ESTIMATED CURRENT YEAR ENDING **6/30/2025**	FINAL APPROVED BUDGET YEAR ENDING **6/30/2026**
Total Operating Revenues	600	600	600
Total Operating Expenses	93,610	129,920	241,995
Total Non Operating Revenues	134,348	134,894	136,894
Total Non Operating Expenses	-	-	-

verditvdistrict@gmail.com C:775.846.1178 O:775.357.8676

VERDI TELEVISION MAINTENANCE DISTRICT
VERDI, NEVADA

◆

Financial Statements

June 30, 2024

◆

Knott
Certified Public Accountant
65 Regency Way, Suite C
Reno, Nevada 89509

VERDI TELEVISION MAINTENANCE DISTRICT
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KNOTT
Certified Public Accountant
65 Regency Way, Suite C
Reno, Nevada 89509

(775) 746-2900

Accountant's Compilation Report

Board of Trustees
Verdi Television Maintenance District
Verdi, Nevada

Management is responsible for the accompanying financial statements of Verdi Television Maintenance District (the District), which comprise the statement of assets, liabilities, and fund equity (Modified Cash Basis) as of June 30, 2024, with comparative totals as of June 30, 2023, and the related statement of revenues, expenses, and changes of fund equity – budget and actual (Modified Cash Basis), and the statement of cash flows (Modified Cash Basis) for the years then ended, and the related notes to the financial statements in accordance with modified cash basis of accounting. We have performed a compilation engagement in accordance with the Statements on Standards for Accounting and Review Services promulgated by the Accounting and Review Services Committee of the AICPA. We did not audit or review the financial statements nor were we required to perform any procedures to verify the accuracy or completeness of the information provided by management. Accordingly, we do not express an opinion, a conclusion, nor provide any form of assurance on these financial statements.

We draw attention to Note 1 of the financial statements, which describes the basis of accounting. The financial statements have been prepared on the modified cash basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America.

Property and equipment are not capitalized or depreciated under the cash basis of accounting. Management has informed us that the District capitalized and depreciated property and equipment totaling $860,621. If property and equipment were not capitalized and depreciated, property and equipment, net of $239,457 would not be recorded and fund equity would be decreased by $84,933, as of June 30, 2024, and net income would be decreased by $154,524 for the year then ended.

Management has omitted the management's discussion and analysis information that is required to be presented for the purposes of additional analysis. Such missing information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic or historical context.

Knott CPA

Reno, Nevada
January 24, 2025

VERDI TELEVISION MAINTENANCE DISTRICT
Statement of Assets, Liabilities and Fund Equity (Modified Cash Basis)
June 30, 2024
(With comparative totals for 2023)

ASSETS

	2024	2023
Current Assets		
Cash and cash equivalents	$ 728,679	$ 841,865
Property and Equipment		
Building and improvements	52,699	52,699
Machinery and equipment	807,922	628,082
	860,621	680,781
Less: accumulated depreciation	(621,164)	(595,848)
Total Property and Equipment, Net	239,457	84,933
Total Assets	$ 968,136	$ 926,798

LIABILITIES AND FUND EQUITY

Current Liabilities	$ -	$ -
Fund Equity - Unrestricted	968,136	926,798
Total Liabilities and Fund Equity	$ 968,136	$ 926,798

VERDI TELEVISION MAINTENANCE DISTRICT

See accountant's compilation report and accompanying notes.

VERDI TELEVISION MAINTENANCE DISTRICT

Statement of Revenues, Expenses and Changes in Fund Equity (Modified Cash Basis)
For Year Ended June 30, 2024
(With comparative totals for 2023)

	2024			
	Budget	Actual	Favorable (Unfavorable)	2023
Operating Revenues				
Rental income	$ 600	$ 600	$ -	$ 600
Operating Expenses				
Advertising	-	438	(438)	-
Bookkeeping & professional	36,000	35,500	500	36,000
Depreciation	22,000	25,316	(3,316)	16,064
Donations	5,000	5,000	-	5,000
Equipment rental	4,000	-	4,000	-
Fines	-	-	-	6,000
Insurance	4,600	-	4,600	-
Legal and accounting	9,000	4,988	4,012	7,275
Office expense	8,000	1,045	6,955	598
Rent	7,800	8,184	(384)	8,171
Repairs and maintenance	120,000	5,246	114,754	53,083
Special equipment	70,000	-	70,000	-
Utilities	7,472	7,893	(421)	6,627
Total Operating Expenses	293,872	93,610	200,262	138,818
Operating Gain (Loss)	(293,272)	(93,010)	200,262	(138,218)
Non-Operating Revenue				
Tax revenue	166,797	134,348	(32,449)	137,348
Net Income (Loss)	$(126,475)	41,338	$ 167,813	(870)
Fund Equity – Beginning of Year		926,798		927,668
Fund Equity – End of Year		$ 968,136		$ 926,798

See accountant's compilation report and accompanying notes.

VERDI TELEVISION MAINTENANCE DISTRICT

Statement of Cash Flows (Modified Cash Basis)
For Year Ended June 30, 2024
(With comparative totals for 2023)

	2024			
	Budget	Actual	Favorable (Unfavorable)	2023
Cash Flows from Operating Activities				
Cash received from rents	$ 600	$ 600	$ -	$ 600
Cash paid for goods and Services	(271,872)	(68,294)	203,578	(122,754)
Net cash provided (used) Operating activities	(271,272)	(67,694)	203,578	(122,154)
Cash Flows from Investing Activities				
Purchase of fixed assets	(120,000)	(179,840)	(59,840)	(26,899)
Tax revenue received	166,797	134,348	(32,449)	137,348
Net cash provided (used) Investing activities	46,797	(45,492)	(92,289)	110,449
Net Increase (Decrease) In Cash	(224,475)	(113,186)	111,289	(11,705)
Cash Balance, Beginning of Year	576,102	841,865	265,763	853,570
Cash Balance, End of Year	$ 351,627	$ 728,679	$ 377,052	$ 841,865
Reconciliation of Operating Income to Net Cash Provided by Operating Activities				
Operating income (loss)		$ (93,010)		$(138,218)
Adjustments to reconcile Operating loss to net cash provided by operating activities				
Depreciation		25,316		16,064
		25,316		16,064
Net Cash (Used) Provided by Operating Activities		$ (67,694)		$(122,154)

See accountant's compilation report and accompanying notes.

VERDI TELEVISION MAINTENANCE DISTRICT
Notes to Financial Statements
June 30, 2024

1. SUMMARY OF ACCOUNTING POLICIES

Reporting Entity

The financial statements present the financial position, results of operations, changes in fund equity and cash flows for the Verdi Television Maintenance District (the District), which is under the jurisdiction of the Verdi Television Maintenance District's Board of Trustees (the Board). The District was created and operates under Chapter 318 of the Nevada Revised Statutes. The District is fiscally independent of all other government entities and has no component units nor is it a component unit of another entity.

The District provides television rebroadcast services for the people living within the District and is managed by five trustees elected by popular vote. The Board does not have the power to levy taxes.

The Board annually certifies the amount of money necessary to maintain equipment and property of the District. The revenues, which the District is entitled to receive, are established by the Nevada Revised Statutes.

Fund Accounting

The accounts of the Verdi Television Maintenance District are organized into one fund, an Enterprise Fund. The measurement focus of an Enterprise Fund is to determine net income and, as such, the Verdi Television Maintenance District accounting records are maintained on the cash basis of accounting. This basis recognizes assets, liabilities, net assets/fund equity, revenues and expenditures/expenses which result from cash transactions with a provision for depreciation. This basis is a comprehensive basis of accounting other than accounting principles generally accepted in the United States of America.

Enterprise Funds are used to account for operations (a) that are financed and operated in a manner similar to private business enterprise – where the intent of the governing body is that the costs (expenses, including depreciation) of providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges; or (b) where the governing body has decided that periodic determination of revenues earned, expenses incurred, and/or net income is appropriate for capital maintenance, public policy, management control, accountability or other purposes.

VERDI TELEVISION MAINTENANCE DISTRICT
Notes to Financial Statements
June 30, 2024

1. SUMMARY OF ACCOUNTING POLICIES (Continued)

Fixed Assets

Valuation – The basis for valuing the District's capital assets has primarily been historical cost.

Depreciation – Depreciation is calculated using the straight-line method over the estimated useful lives of fixed assets. Total depreciation for the years ended 2024 and 2023 is $25,316 and $16,064, respectively.

Use of Estimates

The preparation of financial statements requires management to make estimates and assumptions that affect the reported assets and liabilities and the reported amounts of revenues and expenses for the year ended June 30, 2024. These estimates are based on management's knowledge and experience and due to their prospective nature, actual results could differ from those estimates.

Economic Dependency

The District receives funds from Washoe County based on an estimated resident population as of July 1 for each year. If the population base in Verdi should significantly decrease, the revenues of the District would decrease correspondingly.

Budget Policies

The Verdi Television District is exempt from certain budget requirements under Nevada Revised Statutes which would ordinarily require the submission of a tentative budget each year. The petition for exemption must be submitted to the Nevada Department of Taxation on or before March 1 each year to be effective for the succeeding fiscal year. Thus, the Verdi Television District is in compliance with the Local Government Budget Act within the Nevada Revised Statutes.

VERDI TELEVISION MAINTENANCE DISTRICT
Notes to Financial Statements
June 30, 2024

1. SUMMARY OF ACCOUNTING POLICIES (Continued)

Budget Policies (Continued)

1. The Budget is adopted on a basis consistent with generally accepted accounting principles (GAAP). All appropriations lapse at year end.

2. Budget amounts may be transferred if amounts do not exceed the original budget. Budget augmentations in excess of original budgetary amounts may be implemented by including the augmentation in the next quarterly report to the Department of Taxation. Budget transfers and augmentations must be approved by the Board of Trustees.

3. In accordance with State Statute and the Nevada Administrative Code, actual expenses may not exceed the sum of budgeted operating and non-operating expenses.

There were no amendments to the 2023-2024 budget during the year.

Summary of Accounting Basis Used in Financial Statements

The accompanying financial statements are presented on the modified cash basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America. Accounting principles generally accepted in the United States of America require all revenue and accounts receivable to be recorded in the period in which revenue is earned, and expenses and accounts payable to be recorded in the period in which they are incurred. In the accompanying financial statements, certain revenue has been recorded when cash is received, and certain expenses have been recorded when cash is disbursed.

Cash

The District maintains all of its cash accounts with the Washoe County Treasurer in Reno, Nevada. The carrying amount is the same as the amount on deposit with the Washoe County Treasurer. The treasurer obtains collateral held in the name of the District.

	2024	2023
Carrying amount	$ 728,679	$ 841,865
On deposit with County Treasurer	$ 728,679	$ 841,865

VERDI TELEVISION MAINTENANCE DISTRICT
Notes to Financial Statements
June 30, 2024

2. PROPERTY AND EQUIPMENT

	2024	2023
Building and improvements	$ 52,699	$ 52,699
Machinery and equipment	807,922	628,082
	860,621	680,781
Less: accumulated depreciation	(621,164)	(595,848)
Total Property and Equipment	$ 239,457	$ 84,933

3. SUBSEQUENT EVENTS

The District did not have any subsequent events through January 24, 2025, which is the date the financial statements were available to be issued for events requiring recording or disclosure in the financial statements for the year ended June 30, 2024.

STATE OF NEVADA
DEPARTMENT OF TAXATION
Web Site: https://tax.nv.gov
1550 College Parkway, Suite 115
Carson City, Nevada 89706-7937
Phone: (775) 684-2000 Fax: (775) 684-2020
Call Center: (866) 962-3707

STEVE SISOLAK
Governor
JAMES DEVOLLD
Chair, Nevada Tax Commission
SHELLIE HUGHES
Executive Director

LAS VEGAS OFFICE
700 E. Warm Springs Rd, Ste., 200
Las Vegas, Nevada 89119
Phone (702) 486-2300 Fax (702) 486-2373

RENO OFFICE
4600 Kietzke Lane
Building L, Suite 235
Reno, NV 89502
Phone: (775) 687-9999
Fax: (775) 688-1303

February 26, 2025

Michelle Zunino Banbury
Verdi Television Maintenance District
P.O. Box 214
Verdi, NV 89439

Re: Annual Audit Report – Fiscal Year 2024

Dear Board of Directors:

Pursuant to NRS 354.6245, the Department of Taxation is charged with the review of all annual audits to determine their compliance with statutes and/or regulations. The Department must also identify all violations of statute and/or regulations reported therein.

The Department has completed its review of your audit report, and NO violations of statute and/or regulations were noted. The Department has requested that management & the auditor review and ensure future compliance with the statutory provisions required by NRS 354.624 and NRS 354.6241.

If you should have any questions, please do not hesitate to call me at 775-684-2065 or e-mail me at kgrahmann@tax.state.nv.us.

Sincerely,

Kellie Grahmann

Kellie Grahmann
Budget Analyst
Local Government Finance
Department of Taxation

Verdi TV District

P.O. Box 214 Verdi, NV 89439 165 Bridge Street, Verdi, NV 89439

Minutes of Meeting February 27, 2025

DRAFT: *Approval of these draft minutes, or any changes to the draft minutes, will be reflected in writing in the next meeting minutes and/or in the minutes of any future meeting where changes to these minutes are approved by the Television Board.*

Minutes of the meeting of the Verdi Television District held February 27, 2025, at the Old Verdi School, 165 Bridge St., Verdi, Nevada.

1. **CALL TO ORDER:** Meeting was called to order by Hud Horton, at 6:00 pm.

2. **ROLL CALL/DETERMINATION OF QUORUM:** Roll call was heard, and a quorum of 5 members were determined.
   MEMBERS PRESENT: Hud Horton, Sophia Banbury, Lisa Peterson, Olivia Banbury, Kelli Mosconi
   MEMBERS ABSENT: None

3. **APPROVAL OF AGENDA FOR MEETING OF FEBRUARY 27, 2025 (FOR POSSIBLE ACTION):** Motion was made by Sophia Banbury to approve the February 27, 2025, meeting agenda. Olivia Banbury seconded the motion. The motion carried unanimously.

4. **APPROVAL OF MEETING MINUTES OF APRIL 11, 2024 (FOR POSSIBLE ACTION):** Sophia Banbury moved to approve the minutes as read. Motion was seconded by Olivia Banbury and carried unanimously.

5. **REPORTS AND UPDATES:**
   a. **Lawsuit-** Michelle Zunino reported that the lawsuit has been settled.
   b. **Spectrum service-**Michelle Zunino reported that the Spectrum service at 740 Bridge Street has been cancelled. Jim Middlebrooks returned equipment to Spectrum.
   c. **Carbon Monoxide and hydrogen OSHA-** Michelle updated the board that Jim Middlebrooks has investigated OSHA-compliant gas monitors for carbon monoxide and hydrogen detection, he said they could potentially cost up to $10,000. Middlebrooks wrote that Hazardous Equipment Companies have been contacted; possible site reviews needed first, pending snow melt and access to site.
   d. **FCC Licenses-**Michelle Zunino reported that all licenses are current. Lisa Peterson asked if the FCC website was retaining the correct contact information for the district because in the past it kept reverting to old contact information. Michelle checked during the meeting and found that it is again reverting to old information. Michelle will reach out to them again to try to correct the information. Jim Middlebrooks conveyed to Michelle the FCC licenses need to be posted at the Peavine site. Michelle will get a copy to Jim to post.

6. **PUBLIC COMMENT:** None

7. **OLD BUSINESS – (POSSIBLE ACTION TO BE TAKEN)**
   A. **Generator**-Michelle Zunino reported that the generator is installed and working.
   B. **Insurance**- Board reviewed quote from Chubb. Motion was made by Sophia Banbury to approve and accept the quote from Chubb including the Terrorism coverage. Lisa Peterson seconded the motion. Motion carried unanimously.
   C. **Spectrum service and moving antennae**: Jim Middlebrooks sent message explaining that Bud Mosconi is working with the new tenants at 740 2nd Street location to coordinate a time to remove antennae from rooftop and place at 165 Bridge St. Jim Middlebrooks is reviewing the best location to place antennae,

possibly in the bell tower at 165 Bridge Street or on garage roof. Jim Middlebrooks sent message following up on question regarding the possibility of receiving Channel 5 concluded that our options are:

- **a.** Contact attorney and file suit for contract breech.
- **b.** Attempt to request a special frequency issue from FCC under "displacement" very hard to get.
- **c.** Wait for FCC frequency bid to open for Nevada – this is not a scheduled event. It happens at the "whims" of the FCC. May open in October of this year or next year.

8. **NEW BUSINESS-POSSIBLE ACTION TO BE TAKEN**

A. Petition and Resolution for Exemption (Possible Action to be Taken)

The petition was adopted as presented. A motion was made by Sophia Banbury to approve the Petition and Resolution for Exemption, Olivia Banbury seconded the motion. Motion carried unanimously.

B. Peavine Peak Communications Site Management Plan- (POSSIBLE ACTION TO BE TAKEN).

a. The board discussed the Site Management Plan, Hud Horton highlighted a few requirements regarding certain dates that must be adhered to, the site needs to be cleaned up and maintained, fire extinguishers, list of occupants in the building and the rental fees, he mentioned J. Middlebrooks has a list. The board discussed scheduling a day to go to site to help with clean up, when weather permits access.

Michelle Zunino explained that the USDA Forest Service sends an annual Technical Inspection form in August, an annual Facility Owner and Occupant Inventory of Communications Uses in October, and an annual rental bill in December. Lisa Peterson suggested having a yearly calendar of with important dates listed to have at meetings.

C. Financial Statements- (POSSIBLE ACTION TO BE TAKEN) 2024 Financial Statements were distributed.

9. **CHAIR/MEMBER COMMENTS—** This item is limited to announcements by Board members of topics/issues posed for future workshop/agendas.

- **a.** Michelle Zunino commented that the Verdi TV District will be posting notice of meeting on the Nevada Public Notice website as required by NRS. It is not required that the TV District has a website. Zunino explained that if in the future the board chose to have a website it would need to be ADA compliant.

10. **PUBLIC COMMENT—** None

11. **ADJOURNMENT (FOR POSSIBLE ACTION).**

Sophia Banbury made a motion to adjourn the meeting which was seconded by Olivia Banbury. Motion carried unanimously.

Respectfully submitted,

Michelle Zunino, Secretary

Verdi TV District

P.O. Box 214 Verdi, NV 89439 165 Bridge Street, Verdi, NV 89439

The following documents were presented at the Verdi Television District's meeting on February 27, 2025

- Agenda
- Minutes of April 11, 2024, meeting
- Petition and Resolution for Exemption Form
- Financials for FY23
- Insurance Quote
- Peavine Peak Communications Site Management Plan
- Certificate of posting

verditvdistrict@gmail.com C:775.846.1178 O:775.357.8676

STATE OF NEVADA

DEPARTMENT OF TAXATION

MAIN OFFICE
3850 Arrowhead Drive
Carson City, Nevada 89706

JOE LOMBARDO
Governor

GEORGE KELESIS
Chair, Nevada Tax Commission

SHELLIE HUGHES
Executive Director

March 12, 2025

Michelle Zunino
Verdi TV District
P.O. Box 214
Verdi, NV 89439

Re: Exempt Status for Fiscal Year 2025-2026

Dear Ms. Zunino:

The Resolution filed by your district for exemption from certain filings pursuant to NRS 354.475 has been reviewed by the Department of Taxation and is hereby granted exemption from the following:

1. Filing a tentative budget for Fiscal Year 2025-26.
2. Filing an audit report for Fiscal Year 2024-25.
3. All publishing requirements of the Local Government Budget and Finance Act, except the annual publication of a notice of budget adoption and filing.
4. Maintaining accounting records on an accrual or modified accrual basis.

The above exemption is conditioned on the district's proposed expenditures for fiscal year ending June 30, 2025, not exceeding **$300,000**. In the event that the actual expenditures for Fiscal Year **2025** exceed **$300,000**, statutory filing requirements shall apply.

With this exemption, this District is required to:

a. File an annual fiscal report and quarterly status reports in accordance with NRS 354.6015.
b. File the **Annual Budget on or before April 15, 2025,** pursuant to NRS 354.475.
c. Provide notice and hold a public hearing for the budget. The date for your **public hearing must be prior to the adoption of the annual budget, pursuant to NAC 354.050.**
d. File a Statement of Revenues, Expenditures and Changes in Fund Balance, as well as a Balance Sheet for governmental fund types; or a Statement of Revenues, Expenses and Changes in Net Assets and a Balance Sheet for an enterprise fund on or before **January 1st** of each year, pursuant to NAC 354.040 and NAC 354.559, 2 (f).

There will be no exception for items a through d. Failure to comply with any of these four items will cause the exemption to be rescinded.

This exemption applies only to Fiscal Year 2025-2026 documents. A new petition must be filed for Fiscal Year 2026-2027.

If you have any questions, please call me at (775) 684-2065 or e-mail at Kgrahmann@tax.state.nv.us.

Sincerely,

Kellie Grahmann

Kellie Grahmann
Budget Analyst
Local Government Finance

Minutes of Meeting April 10, 2025

DRAFT: *Approval of these draft minutes, or any changes to the draft minutes, will be reflected in writing in the next meeting minutes and/or in the minutes of any future meeting where changes to these minutes are approved by the Television Board.*

Minutes of the meeting of the Verdi Television District held April 10, 2025, at the Old Verdi School, 165 Bridge St., Verdi, Nevada.

1. **CALL TO ORDER:** Meeting was called to order by Hud Horton at 6:00 pm
2. **ROLL CALL/DETERMINATION OF QUORUM:** Roll call was heard, and a quorum of members were determined.
   MEMBERS PRESENT: Lisa Peterson, Sophia Banbury, Kelli Mosconi, Hud Horton, Olivia Banbury
   MEMBERS ABSENT: None
3. **APPROVAL OF AGENDA FOR MEETING OF APRIL 10, 2025 (FOR POSSIBLE ACTION):** Motion was made by Sophia Banbury to approve the April 10, 2025, meeting agenda. Olivia Banbury seconded the motion. The motion carried unanimously.
4. **APPROVAL OF MEETING MINUTES OF FEBRUARY 27, 2025 (FOR POSSIBLE ACTION):** Sophia Banbury moved to approve the minutes as read. The motion was seconded by Olivia Banbury and carried unanimously.
5. **REPORTS AND UPDATES:**
   a. **Generator Repair**: Michelle updated the board on the generator repairs that were needed. During the installation process CD & Power started the generator without checking for animals. There was an animal nesting in the generator at the time the installation/testing process took place. They were advised by Jim Middlebrooks to check for animals prior to starting up. The animal was thrown, and it caused damage. CD & Power repaired the damage at no cost to the district.

   b. **Insurance:** Michelle updated the board that the insurance binder arrived and needed to be signed.

   c. **USDA Forest Service:** Hud reported that he spoke with the Forest Service regarding the fence repair. He is working on getting a couple of quotes from fencing contractors, he plans to take them to the site when it is safe to travel there, both indicated that they could get the fence repaired this summer. He also mentioned getting the yard cleaned up this summer. Jim Middlebrooks commented on the structure/ debris clear up, which may be a large expense and may require permits. He reported that KUNR and KOH were asking about exterior lighting at the site, Jim spoke about restrictions as to having exterior lighting at all and would need to speak with the Forest Service Agent to see what is available.

DRAFT

6. **PUBLIC COMMENT:**

   Four members of the public were present. Frank Leto, Vicki Railton, Kolo Channel 8's Terri Russell and cameraman (name not given.)

   Frank Leto, a resident of Del Webb, expressed concerns about the over-the-air signal and suggested alternative antenna locations, a repeater, or a secondary tower. He criticized what he feels is a lack of transparency and accountability, mentioning the absence of a website. He suggested that the TV District put notifications up on the Somerset HOA and/or the Sierra Canyon HOA.

   Michelle explained that the district is not required to have a website.

   Vicki Railton, a resident of Sierra Canyon, indicated that she had difficulty finding information about the TV District on the internet; she alleged that the district was not transparent or accountable. Railton questioned why the TV district did not have a website.

7. **NEW BUSINESS:**

   A. **BUDGET FY 2025-2026 (FOR POSSIBLE ACTION):** Motion was made by Sophia Banbury to approve the budget for FY 2025-2026. Lisa Peterson seconded the motion. Motion carried unanimously.

8. **OLD BUSINESS- (POSSIBLE ACTION TO BE TAKEN)** None

9. **CHAIR/MEMBER COMMENTS—** The board reiterated their commitment to looking into a website and the challenges involved.

10. **PUBLIC COMMENT:** Frank Leto inquired if there were emergency funds to set up a website. Vicki Railton again inquired about a website.

11. **ADJOURNMENT (FOR POSSIBLE ACTION).**
    Sophia made a motion to adjourn the meeting which was seconded by Olivia. The motion carried unanimously.

Respectfully submitted,

Michelle Zunino, Secretary

DRAFT

Verdi TV District
P.O. Box 214 Verdi, NV 89439 165 Bridge Street, Verdi, NV 89439

The following documents were presented at the Verdi Television District's meeting on April 10, 2025.

- Agenda
- Minutes from February 27, 2025 meeting
- Budget
- Certificate of posting
- Budget Worksheet
- Department of Taxation Letters: Annual Audit Report FY 2024, Exempt Status FY 25-26

DRAFT

verditvdistrict@gmail.com C:775.846.1178 O:775.357.8676

COPY

Western Surety Company

RIDER

To be attached to and form part of Bond No. 70859520

It is hereby mutually agreed and understood by and between Western Surety Company and VERDI TV MAINTENANCE DISTRICT

that instead of as originally written; the bond is changed or revised in the particulars checked below:

- ☐ **Principal Name changed to:**
- ☒ **Principal Address changed to:**
  165 BRIDGE STREET, VERDI, NV 89439
- ☐ **Vehicle/Vessel/Hull Information changed to:**
- ☐ **Lost Instrument Information changed to:**
- ☐ **Identification Number changed to:**
- ☐ **Penalty Amount changed to:**
- ☐ **Additional or Event Location:**
- ☐ **Effective Date changed to:**
- ☐ **Expiration Date changed to:**
- ☐ **The following bond information changed:**

But in no event shall Western Surety Company's total liability for all locations exceed the aggregate amount set forth in the bond, regardless of the number of years this bond remains in force, the number of claims made, or the number of renewal premiums payable or paid.
It is further understood and agreed that all other terms and conditions of this bond shall remain unchanged.

This Rider becomes effective on the 17th day of September, 2025.

Signed this 17th day of September, 2025.

WESTERN SURETY COMPANY

By: _____
Larry Kasten, Vice President

Form F9586

Western Surety Company

DISHONESTY BOND
(FOR ANY TYPE OF BUSINESS)

Bond No. 70859520

In consideration of the agreed premium, Western Surety Company, a South Dakota corporation (the "Surety"), hereby agrees to indemnify Barbara A. Ting dba Verdi T V District
150 BRIDGE ST., VERDI, NV 89439
(the "Insured"), against any loss of money or other property which the Insured shall sustain or for which the Insured shall incur liability to any Customer or Subscriber of the Insured through any fraudulent or dishonest act or acts committed by any Employee or Employees of the Insured acting alone or in Collusion with others, the amount of indemnity on each of such Employees being

TEN THOUSAND AND NO/100 DOLLARS ($ $10,000.00).

THE FOREGOING AGREEMENT IS SUBJECT TO THE FOLLOWING CONDITIONS AND LIMITATIONS:

TERM OF BOND:

SECTION 1. The term of this bond begins with the 11 day of March, 2010, standard time at the address of the Insured above given, and ends at 12:00 o'clock night, standard time, on the effective date of the cancellation of this bond in its entirety.

EXCLUSION:

SECTION 2. This bond does not apply to loss, or to that part of any loss, as the case may be, the proof of which, either as to its factual existence or as to its amount, is dependent upon an inventory computation or a profit and loss computation. In addition, the policy does not apply to the defense of any legal proceedings brought against the Insured, or to fees, costs or expenses incurred or paid by the Insured in prosecuting or defending any legal proceedings whether or not such proceedings results or would result in a loss to the Insured covered by this policy. In addition, the Company shall not be liable for any costs, fees and other expenses incurred by the Insured in establishing the existence or the amount of loss covered under this policy.

DISCOVERY PERIOD:

SECTION 3. Loss is covered under this bond only (a) if sustained through any act or acts committed by any Employee of Insured while this bond is in force as to such Employee, and (b) if discovered prior to the expiration or sooner cancellation of this bond in its entirety as provided in Section 10, or from its cancellation or termination in its entirety in any other manner, whichever shall first happen.

DEFINITION OF EMPLOYEE:

SECTION 4. The word Employee or Employees, as used in this bond, shall be deemed to mean, respectively, one or more of the natural persons (except directors or trustees of the Insured, if a corporation, who are not also officers or employees thereof in some other capacity) while in the regular service of the Insured in the ordinary course of the Insured's business during the term of this bond, and whom the Insured compensates by salary, or wages and has the right to govern and direct in the performance of such service, and who are engaged in such service within any of the States of the United States of America, or within the District of Columbia, Puerto Rico, the Virgin Islands, or elsewhere for a limited period, but not to mean brokers, factors, commission merchants, consignees, contractors, or other agents or representatives of the same general character.

FRAUDULENT OR DISHONEST ACT:

SECTION 5. A FRAUDULENT OR DISHONEST ACT OF AN EMPLOYEE OF THE INSURED SHALL MEAN AN ACT WHICH IS PUNISHABLE UNDER THE CRIMINAL CODE IN THE JURISDICTION WITHIN WHICH ACT OCCURRED, FOR WHICH SAID EMPLOYEE IS TRIED AND CONVICTED BY A COURT OF PROPER JURISDICTION.

MERGER OR CONSOLIDATION:

SECTION 6. If any natural persons shall be taken into the regular service of the Insured through merger or consolidation with some other concern, the Insured shall give the Surety written notice thereof and shall pay an additional premium on any increase in the number of Employees covered under this bond as a result of such merger or consolidation computed pro rata from the date of such merger or consolidation to the end of the current premium period.

NON-ACCUMULATION OF LIABILITY:

SECTION 7. Regardless of the number of years this bond shall continue in force and the number of premiums which shall be payable or paid, the liability of the Surety under this bond shall not be cumulative in amounts from year to year or from period to period.

LIMIT OF LIABILITY UNDER THIS BOND AND PRIOR INSURANCE:

SECTION 8. With respect to loss or losses caused by an Employee or which are chargeable to such Employee as provided in Section 5 and which occur partly under this bond and partly under other bonds or policies issued by the Surety to the Insured or to any predecessor in interest of the Insured and terminated or cancelled or allowed to expire and in which the period for discovery has not expired at the time any such loss or losses thereunder are discovered, the total liability of the Surety under this bond and under such other bonds or policies shall not exceed, in the aggregate, the amount carried under this bond on such loss or losses or the amount available to the Insured under such other bonds or policies, as limited by the terms and conditions thereof, for any such loss or losses, if the latter amount be the larger.

SALVAGE:

SECTION 9. If the Insured shall sustain any loss or losses covered by this bond which exceed the amount of coverage provided by this bond, the Insured shall be entitled to all recoveries, except from suretyship, insurance, reinsurance, security or indemnity taken by or for the benefit of the Surety, by whomsoever made, on account of such loss or losses under this bond until fully reimbursed, less the actual cost of effecting the same; and less the amount of the deductible carried on the Employee causing such loss or losses; and any remainder shall be applied to the reimbursement of the Surety.

CANCELLATION AS TO ANY EMPLOYEE:

SECTION 10. This bond shall be deemed cancelled as to any Employee: (a) immediately upon discovery by the Insured, or by any partner or officer thereof not in collusion with such Employee, of any fraudulent or dishonest act on the part of such Employee; or (b) at 12:00 o'clock night, standard time, upon the effective date specified in a written notice served upon the Insured or sent by mail. Such date, if the notice be served, shall be not less than ten days after such service, or, if sent by mail, not less than fifteen days after the date of mailing. The mailing by Surety of notice, as aforesaid, to the Insured at its principal office shall be sufficient proof of notice.

CANCELLATION AS TO BOND IN ITS ENTIRETY:

SECTION 11. This bond shall be deemed cancelled in its entirety at 12:00 o'clock night, standard time, upon the effective date specified in a written notice served by the Insured upon the Surety or by the Surety upon the Insured, or sent by mail. Such date, if served by the Surety, shall be not less than ten days after such service, or if sent by the Surety by mail, not less than fifteen days after the date of mailing. The mailing by the Surety of notice, as aforesaid, to the Insured at its principal office shall be sufficient proof of notice. The Surety shall refund to the Insured the unearned premium computed pro rata if this bond be cancelled at the instance of the Surety, or at short rates if cancelled or reduced at the instance of the Insured.

PRIOR FRAUD, DISHONESTY OR CANCELLATION:

SECTION 12. No Employee, to the best of the knowledge of the Insured, or of any partner or officer thereof not in collusion with such Employee, has committed any fraudulent or dishonest act in the service of the Insured or otherwise. If prior to the issuance of this bond, any fidelity insurance in favor of the Insured or any predecessor in interest of the Insured and covering one or more of the Insured's Employees shall have been cancelled as to any of such Employees by reason of (a) the discovery of any fraudulent or dishonest act on the part of such Employees, or (b) the giving of written notice of cancellation by the insurer issuing said fidelity insurance, whether the Surety or not, and if such Employees shall not have been reinstated under the coverage of said fidelity insurance or superseding fidelity insurance, the Surety shall not be liable under this bond on account of such Employees unless the Surety shall agree in writing to include such Employees within the coverage of this bond.

LOSS-NOTICE-PROOF-LEGAL PROCEEDINGS:

SECTION 13. At the earliest practical moment, and at all events not later than fifteen days after discovery of any fraudulent or dishonest act on the part of any Employee by the Insured, or by any partner or officer thereof not in collusion with such Employee, the Insured shall give the Surety written notice thereof and within four months after such discovery shall file with the Surety affirmative proof of loss, itemized and duly sworn to, and shall upon request of the Surety render every assistance, not pecuniary, to facilitate the investigation and adjustment of any loss. No suit to recover on account of loss under this bond shall be brought before the expiration of two months from the filing of proof as aforesaid on account of such loss, nor after the expiration of fifteen months from the discovery as aforesaid of the fraudulent or dishonest act causing such loss. If any limitation in this bond for giving notice, filing claim or bringing suit is prohibited or made void by any law controlling the construction of this bond, such limitation shall be deemed to be amended so as to be equal to the minimum period of limitation permitted by such law.

PART-TIME OR TEMPORARY EMPLOYEES:

SECTION 14. The named Insured shall not at any time while this bond is in force direct any temporary or part-time Employee(s) to any subscriber's premises unless such Employee(s) is accompanied by a foreman who is in the regular employ of the Insured.

SIGNED, SEALED AND DATED January 15, 2010.

WESTERN SURETY COMPANY

By _____
PAUL T. BRUFLAT, SENIOR VICE PRESIDENT

October 1, 2025

Status of Licenses

All licenses are current. Next renewal date for Nevada is June 3, 2030.

www.fcc.gov/media/television/broadcast-television-license-renewal-dates-by-state

♦ P.O. Box 214 ♦ 165 Bridge Street Verdi, NV 89439
verditvdistrict@gmail.com

Verdi TV District

P.O. Box 214 Verdi, NV 89439 165 Bridge Street, Verdi, NV 89439

October 1, 2025

Dear Board of County Commissioners:

The Verdi Television is submitting a recommendation for the continuation of the Verdi TV District and statement on the importance of the Verdi TV District Board in accordance with AB301.

As a government agency of Washoe County, the Verdi TV District is responsible for the operation and maintenance of the facility that re-transmits free, over-the-air television and radio programming to residents of the district. The continuation of the Board is essential to ensure reliable oversight, fiscal accountability, and long-term sustainability of this public service.

The Board provides governance and direction for the district's operations, ensuring that technical infrastructure is properly maintained, regulatory requirements are met, and community needs are represented. Without the Board's oversight, the district's ability to provide consistent, accessible, and cost-effective re-transmitted broadcast services to the residents of Verdi and surrounding areas would be significantly compromised.

The Board's continuation guarantees the preservation of free public access to vital broadcast programming, supporting both public safety communications and community access to news, information, and entertainment.

Respectfully,

Michelle Zunino, Secretary
Verdi Television District

verditvdistrict@gmail.com C:775.846.1178 O:775.357.8676

Verdi TV District

P.O. Box 214 Verdi, NV 89439 165 Bridge Street, Verdi, NV 89439

October 1, 2025

Status of Equipment

Site support vendors agree that all active equipment and standby equipment are currently functioning within normal parameters. Two exceptions to this are 1.) UPS transfer buffer. We are awaiting delivery for this replacement UPS. 2.) On demand generator. The generator is currently under repair by Amerigen. Both are estimated to be operating within 14 days. These "out of service" items are due to wildlife damage similar to what NV Energy experienced with their last power outage to Peavine Mountain on September 23, 2025.

verditvdistrict@gmail.com C:775.846.1178 O:775.357.8676

Verdi TV District

PO BOX 214 Verdi, NV 89439
165 Bridge Street Verdi, NV 89439
verditvdistrict@gmail.com
775-846-1178

Nevada Department of Taxation
3850 Arrowhead Dr., 2nd Floor
Carson City, NV 89706

Verdi TV District herewith submits the FINAL budget for the fiscal year ending June 30, 2026

This budget contains 0 funds, including Debt Service, requiring property tax revenues totaling $ 0

The property tax rates computed herein are based on preliminary data. If the final state computed revenue limitation permits, the tax rate will be increased by an amount not to exceed 1%. If the final computation requires, the tax rate will be lowered.

This budget contains 0 governmental fund types with estimated expenditures of $ 0 and 1 proprietary funds with estimated expenses of $ 241,995

Copies of this budget have been filed for public record and inspection in the offices enumerated in NRS 354.596 (Local Government Budget and Finance Act).

CERTIFICATION

I Michelle Zunino
(Print Name)
Secretary
(Title)
certify that all applicable funds and financial operations of this Local Government are listed herein

Signed: Michelle Zunino

Dated: 4/10/2025

Phone: 775-846-1178

APPROVED BY THE GOVERNING BOARD
Only necessary for **FINAL** Budget
(Signature by Docusign is acceptable)

Heidi Hair T, CHAIRMAN
Sophia Benning
Olivia Bankey
Kellene Mascari

SCHEDULED PUBLIC HEARING:
(Must be held from May 19, 2025 to May 31, 2025)

Date and Time: 4/10/2025 @ 6:00 p.m

Publication Date: 4/1/2025

Place: Verdi TV District Offices
1165 Bridge St. Verdi, NV 89439

FULL TIME EQUIVALENT EMPLOYEES BY FUNCTION

	ACTUAL PRIOR YEAR YEAR 06/30/24	ESTIMATED CURRENT YEAR YEAR 06/30/25	BUDGET YEAR YEAR 06/30/26
General Government			
Judicial			
Public Safety			
Public Works			
Sanitation			
Health			
Welfare			
Culture and Recreation			
Community Support			
TOTAL GENERAL GOVERNMENT			
Utilities			
Hospitals			
Transit Systems			
Airports			
Other			
TOTAL			

POPULATION (AS OF JULY 1)	12904	12904	* Estimate: 12,904
SOURCE OF POPULATION ESTIMATE*	GIS US Census 2020 Data/ Washoe County Planning Manager		
Assessed Valuation (Secured and Unsecured Only)	1,279,241,945	1,376,460,486	1,434,037,116
Net Proceeds of Mines			
TOTAL ASSESSED VALUE	1,279,241,945	1,376,460,486	1,434,037,116
TAX RATE			
General Fund			
Special Revenue Funds			
Capital Projects Funds			
Debt Service Funds			
Enterprise Fund			
Other			
TOTAL TAX RATE	0.0179	0.0179	0.0179

*** Use the population certified by the state in March each year. Small districts may use a number developed per the instructions (page 6) or the best information available.**

Verdi Television District
(Local Government)

SCHEDULE S-2 - STATISTICAL DATA

PROPERTY TAX RATE AND REVENUE RECONCILIATION **FISCAL YEAR 2025-2026**

	(1) ALLOWED TAX RATE	(2) ASSESSED VALUATION	(3) ALLOWED AD VALOREM REVENUE [(1) X (2)/100]	(4) TAX RATE LEVIED	(5) TOTAL AD VALOREM REVENUE WITH NO CAP [(**2, line A**)X(4)/100]	(6) AD VALOREM TAX ABATEMENT [(5) - (7)]	(7) AD VALOREM REVENUE WITH CAP
OPERATING RATE: A. PROPERTY TAX Subject to Revenue Limitations	0.0179	1,434,037,116	256,693				
B. PROPERTY TAX Outside Revenue Limitations: Net Proceeds of Mines					XXXXXXXXXXXXXXXX		
VOTER APPROVED: C. Voter Approved Overrides							
LEGISLATIVE OVERRIDES D. Accident Indigent (NRS 428.185)							
E. Indigent (NRS 428.285)							
F. Capital Acquisition (NRS 354.59815)							
G. Youth Services Levy (NRS 62B.150, 62B.160)							
H. Legislative Overrides							
I. SCCRT Loss (NRS 354.59813)							
J. Other:							
K. Other:							
L. SUBTOTAL LEGISLATIVE OVERRIDES							
M. **SUBTOTAL A, C, L**	**0.0179**	**1,434,037,116**	**256,693**				
N. Debt							
O. **TOTAL M AND N**	**0.0179**	**1,434,037,116**	**256,693**				

Verdi Television District
SCHEDULE S-3 - PROPERTY TAX RATE
AND REVENUE RECONCILIATION

The Allowed Revenue required for column 3 can be obtained from the March 15 Final Revenue Projections or manually calculated. If an entity chooses to budget for an amount in column 5 which is lower or higher than the amount produced by the formula, please attach an explanation.

SCHEDULE A-2 PROPRIETARY AND NONEXPENDABLE TRUST FUNDS

Budget For Fiscal Year Ending June 30, 2026

Budget Summary for Verdi Television District
(Local Government)

FUND NAME	*	OPERATING REVENUES (1)	OPERATING EXPENSES (2) **	NONOPERATING REVENUES (3)	NONOPERATING EXPENSES (4)	OPERATING TRANSFERS IN (5)	OPERATING TRANSFERS OUT(6)	NET INCOME (7)
Verdi Television District	E	600	-241,995	136,894				-104,501
TOTAL		600	-241995	136894	0	0	0	-104501

* FUND TYPES: E - Enterprise
I - Internal Service
N - Nonexpendable Trust

** Include Depreciation

PROPRIETARY FUND	(1) ACTUAL PRIOR YEAR ENDING 6/30/2024	(2) ESTIMATED CURRENT YEAR ENDING 6/30/2025	(3) BUDGET YEAR ENDING 06/30/26 TENTATIVE APPROVED	(4) BUDGET YEAR ENDING 06/30/26 FINAL APPROVED
OPERATING REVENUE				
Rent	600	600		600
Total Operating Revenue	600	600		600
OPERATING EXPENSE				
Advertising	438	130		200
Bookkeeping and Professional Services	35,500	35,500		36,000
Donations	5,000	5,000		5,000
Equipment Rental	0	0		15,000
Legal and Accounting	4988	4,326		5000
Office and Information Systems Expenses	1,045	2644		11,000
Rent	8,184	8195		8,195
Repairs and Maintenance	5,246	42,000		68,600
Special Equipment	0	0		400
Capital Improvement				59,000
Utilities	7,893	6,525		7,000
Depreciation/Amortization	25,316	25,000		26,000
Total Operating Expense	93,610	129,920		241,995
Operating Income or (Loss)	-93,010	-129,320		-241,395
NONOPERATING REVENUES				
Interest Earned				
Property Taxes				
Subsidies				
Consolidated Tax	63,893	63,894		63,894
LGTA AB 104 Fairshare	70,455	71,000		73,000
Total Nonoperating Revenues	134,348	134,894		136,894
NONOPERATING EXPENSES				
Interest Expense				
Total Nonoperating Expenses				
Net Income before Operating Transfers				
Transfers (Schedule T)				
In				
Out				
Net Operating Transfers				
CHANGE IN NET POSITION	41,338	5,574		-104,501

Verdi TV District

(Local Government)

SCHEDULE F-1 REVENUES, EXPENSES AND NET POSITION

FUND____ General

PROPRIETARY FUND	(1) ACTUAL PRIOR YEAR ENDING 6/30/2024	(2) ESTIMATED CURRENT YEAR ENDING 6/30/2025	(3) BUDGET YEAR ENDING 06/30/26 TENTATIVE APPROVED	(4) BUDGET YEAR ENDING 06/30/26 FINAL APPROVED
A. CASH FLOWS FROM OPERATING ACTIVITIES:				
Cash received from rents	600	600		600
Cash paid for goods and services	-68294	-104,320.00		-241,995
a. Net cash provided by (or used for) operating activities	-67694	-103,720		-241,395
B. CASH FLOWS FROM NONCAPITAL FINANCING ACTIVITIES:				
b. Net cash provided by (or used for) noncapital financing activities				
C. CASH FLOWS FROM CAPITAL AND RELATED FINANCING ACTIVITIES:				
c. Net cash provided by (or used for) capital and related financing activities				
D. CASH FLOWS FROM INVESTING ACTIVITIES:				
Tax revenue received				
AB104 Fairshare	70,454.60	72,600.00		73,000.00
Consolidated Tax	63,893.40	63,898.40		63,898.35
Purchase of fixed assets	-179,840	0		-59,000
d. Net cash provided by (or used in) investing activities	-45,492	136,498.40		77,893
NET INCREASE (DECREASE) in cash and cash equivalents (a+b+c+d)	-113,186	32,778.40		-163,502
CASH AND CASH EQUIVALENTS AT JULY 1, 20xx	841,865	728,679		726,857
CASH AND CASH EQUIVALENTS AT JUNE 30, 20xx	728,679	762,857.40		563,355.00

Verdi Television District
(Local Government)

SCHEDULE F-2 STATEMENT OF CASH FLOWS

FUND Verdi Television District

SCHEDULE OF EXISTING CONTRACTS

Budget Year 2025-2026

Local Government: Verdi Television District

Contact: Michelle Zunino

E-mail Address: verditvdistrict@gmail.com

Daytime Telephone: 775-846-1178

Total Number of Existing Contracts: _____0_____

Line	Vendor	Effective Date of Contract	Termination Date of Contract	Proposed Expenditure FY 2025-26	Proposed Expenditure FY 2026-27	Reason or need for contract:
1	N/A					
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20	Total Proposed Expenditures					

Additional Explanations (Reference Line Number and Vendor):

SCHEDULE OF PRIVATIZATION CONTRACTS

Budget Year 2025-2026

Local Government: Verdi Television District

Contact: Michelle Zunino

E-mail Address: verditvdistrict@gmail.com

Daytime Telephone: 775-846-1178

Total Number of Privatization Contracts: 0

Line	Vendor	Effective Date of Contract	Termination Date of Contract	Duration (Months/ Years)	Proposed Expenditure FY 2025-26	Proposed Expenditure FY 2026-27	Position Class or Grade	Number of FTEs employed by Position Class or Grade	Equivalent hourly wage of FTEs by Position Class or Grade	Reason or need for contract:
1	N/A									
2										
3										
4										
5										
6										
7										
8	Total									

Page: 8

Attach additional sheets if necessary.

Schedule 32

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA
IN THE MATTER OF:

Application of NVSolarWRX, LLC, for a permit to construct a 450 MW Solar Energy Generating Facility, 345 kV Project Substation, 345 kV Generation-Tie Line, and associated facilities, including an energy storage system to be located in Washoe County, Nevada, pursuant to the Utility Environmental Protection Act	Docket No. 25- _____

VOLUME 1 OF 2

NVSOLARWRX, LLC

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HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

Holland & Hart

Bryce C. Alstead
Partner
Phone 775.327.3067
BAlstead@hollandhart.com

October 1, 2025

Ms. Trisha Osborne
Assistant Commission Secretary
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, Nevada 89701-3109

Re: Docket No. 25-_____: Application of NVSolarWRX, LLC for a permit to construct a 450 MW Solar Energy Generating Facility, 345 kV Project Substation, 345 kV Generation-Tie Line, and associated facilities, including an energy storage system, to be located in Washoe County, Nevada, pursuant to the Utility Environmental Protection Act

Dear Ms. Osborne:

Please accept for filing with the Public Utilities Commission of Nevada the attached Application of NVSolarWRX, LLC for a permit to construct an up to 450 MW solar energy generating facility, 345 kV project substation, 345 kV generation-tie line, and associated facilities, including an energy storage system, to be located in Washoe County, Nevada, pursuant to the Utility Environmental Protection Act. The entire Application is contained in two volumes, which are numbered sequentially. Volume 1 consists of NVSolarWRX, LLC's Application, along with Exhibits A through Exhibit G to the Application. Volumes 2 contains the continuation of Exhibit G through Exhibit L.

An ACH payment in the amount of $200.00 has been submitted electronically for payment of the filing fee.

Should you have any questions, or require additional information, please advise.

Best Regards,

/s/ Bryce C. Alstead
Bryce C. Alstead, Esq.
Erica K. Nannini, Esq.
Holland & Hart LLP
Attorneys for NVSolarWRX, LLC

Location
5470 Kietzke Lane, Suite 100
Reno, NV 89511-2094

Contact
p: 775.327.3000 | f: 775.786.6179
www.hollandhart.com

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35784352_v1

HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Holland & Hart LLP and on October 1, 2025, I caused to be served a true and correct copy of the foregoing document to the following:

ELECTRONIC MAIL

Nevada State Clearinghouse
Department of Conservation & Natural Resources,
Division of State Lands
901 S. Stewart Street, Ste. 5003
Carson City, NV 89701
nevadaclearinghouse@lands.nv.gov

ELECTRONIC MAIL

Jennifer Carr
Nevada Division of Environmental Protection
901 S. Stewart Street, Suite 4001
Carson City, NV 89701
Jcarr@ndep.nv.gov

ELECTRONIC MAIL

Staff Counsel Support
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701-3109
Pucn.sc@puc.nv.gov

ELECTRONIC MAIL

Ernest Figueroa, Esq.
Nevada State Consumer Advocate
Bureau of Consumer Protection
100 N. Carson Street
Carson City, NV 89701
bcpserv@ag.nv.gov

U.S. MAIL TRANSMITTAL:

Washoe County Clerk
1001 E 9th Street
Reno, NV 89512

/s/Cecilia Martin
Cecilia Martin, Legal Secretary
an employee of Holland & Hart LLP

HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA
IN THE MATTER OF:

Application of NVSolarWRX, LLC, for a permit to construct a 450 MW Solar Energy Generating Facility, 345 kV Project Substation, 345 kV Generation-Tie Line, and associated facilities, including an energy storage system to be located in Washoe County, Nevada, pursuant to the Utility Environmental Protection Act	Docket No. 25- _____

APPLICATION OF NVSOLARWRX, LLC, FOR A PERMIT TO CONSTRUCT A 450 MW SOLAR ENERGY GENERATING FACILITY, 345 KV PROJECT SUBSTATION, 345 KV GENERATION-TIE LINE, AND ASSOCIATED FACILITIES, INCLUDING AN ENERGY STORAGE SYSTEM, TO BE LOCATED IN WASHOE COUNTY, NEVADA, PURSUANT TO THE UTILITY ENVIRONMENTAL PROTECTION ACT.

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HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

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Exhibit L Draft Notice

HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

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5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

I. INTRODUCTION

Pursuant to NRS 704.870(1) and NAC 703.423, NVSolarWRX, LLC ("NSW" or the "Applicant") hereby files with the Public Utilities Commission of Nevada (the "Commission") an Application ("Application") for a Permit to Construct ("PTC") the NVSolarWRX Project, which will consist of the following: an up to 450 megawatt ("MW") solar photovoltaic ("PV") generating facility ("Generating Facility"); a 345 kilovolt ("kV") substation ("Project Substation"); an approximately 7-mile-long, 345 kV overhead generation-tie line ("Gen-Tie"); and associated facilities, including a battery energy storage system with a capacity of up to 200 MW ("BESS"), in Washoe County, Nevada (the "Project") pursuant to the requirements of the Utility Environmental Protection Act, NRS 704.820 *et seq.* ("UEPA").

The Project will provide renewable energy to the electrical transmission grid via the existing Fort Sage Substation, which is owned and operated by Sierra Pacific Power Company d/b/a NV Energy ("SPPCo"). Project construction is expected to take place over the course of approximately 7 months, with construction to proceed in four phases as described in Section IV of this Application. The Project will be located on approximately 1,692 acres of private land – including an approximately 1,680-acre property and an approximately 12-acre portion of existing access and utility easements located along Rainbow Way, a designated Truckee Meadows Regional Planning Agency Regional Utility Corridor – in unincorporated Washoe County, Nevada, about 40 miles north of the City of Reno.

The Project falls within the definition of a "utility facility" as set forth in NRS 704.860 for three reasons. First, the Project's primary component will be a renewable energy generating plant which will have a nameplate capacity of greater than 70 MW, making it a utility facility under NRS 704.860(1). Second, pursuant to NRS 704.860(2), the Project's Gen-Tie will be an electric transmission line designed to operate at more than 200 kV, which is not required by local ordinance to be placed underground, and which will be constructed outside of an incorporated city. Third, pursuant to NRS 704.860(2), the Project Substation will be designed to operate at

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200 kV or more, is not required by local ordinance to be placed underground, and will be constructed outside of an incorporated city.

This Application provides the information required under NRS Chapter 704 and NAC Chapter 703, including a discussion of the Environmental Statement ("ES") prepared by Universal Engineering Sciences, Inc. ("UES") for the Project and the exhibits to the Application. The Applicant respectfully requests the Commission's approval of the Application and, following the subsequent filing of all requisite permits and approvals, the issuance of four PTCs for the Project which correspond to the four phases of construction proposed in this Application.

II. INFORMATION REGARDING THE APPLICANT

1. NSW develops, constructs, owns, and operates utility-scale, renewable energy assets.

2. NSW is a Nevada Limited Liability Company authorized to conduct business in the State of Nevada.

3. NSW's principal place of business, mailing address, and telephone number are as follows:

NVSolarWRX, LLC
807 2nd Street
Verdi, NV 89439
Phone: (650) 444-9941

4. Communications concerning this application should be directed to:

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III. RESPONSES TO REQUIRED DISCLOSURES

The information required by NRS 704.870 and NAC 703.423 is provided in the following sections, to the extent that such information is currently available.

DESCRIPTION OF LOCATION

1. A description of the location of the proposed utility facility as required by NRS 704.870(1)(A), including:

(a) A general description of the location of the proposed utility facility, including a regional map that identifies the location of the proposed utility facility. (NAC 703.423(1)(a)).

The 1,692-acre Project site is located in unincorporated Washoe County, within the sparsely populated Honey Lake Valley near the Nevada/California state line, approximately 40 miles north of the City of Reno and 9 miles east of Herlong, California. The Project site consists of the following: (1) the Project property (the "Property"), which consists of 4 adjoining parcels totaling approximately 1,680 acres – known as Washoe County Assessor's Parcel Numbers 074-103-01, 074-103-05, 074-451-20, and 074-452-01; and (2) 7 linear miles (approximately 12 acres) of an existing private access and utility easement – specifically, within the Truckee Meadows Regional Planning Agency's designated Rainbow Way 345 kV Regional Utility Corridor – extending west from the Property two miles to Rainbow Way and continuing five miles south along Rainbow Way to the Fort Sage Substation (the "Gen-Tie Corridor"). NSW owns the Property and has the right to use a non-exclusive easement for the remaining land required for the Project pursuant to a series of deed reservations. *See* ES, at 2-1.

The Project Substation, Generating Facility, and BESS will be constructed within the Property, and the Project will require additional disturbance for the installation of utility poles for the Gen-Tie within the Gen-Tie Corridor – for a total estimated Project disturbance of approximately 1,692 acres of private land. The Project Substation and BESS will be housed in an approximately 15-acre (approximately 800 ft x 800 ft) area to be located near the northwest corner of the Property. The Gen-Tie will be installed along the Gen-Tie Corridor extending west

from the Project Substation to Rainbow Way and continuing south along Rainbow Way to the Fort Sage Substation. The Project site is comprised entirely of vacant rangeland.

Access to the Project would be from Rainbow Way and Fish Springs Road, both of which are public roads, and an existing private access and utility easement between Rainbow Way and the western boundary of Property. Access to main highways would be via Fish Springs Road, which becomes Fort Sage Road (Lassen County Road 32) as it enters California, which connects to Hackstaff Road and eventually US Highway 395 near Doyle, CA.

A map depicting the location of the Project is attached hereto as **Exhibit "A."**

(b) A legal description of the site of the proposed utility facility, with the exception of electric lines, gas transmission lines, and water and wastewater lines, for which only a detailed description of the site is required. (NAC 703.423(1)(b)).

A legal description of the properties which comprise the Property is attached hereto as **Exhibit "B."** The Gen-Tie will start at the Project Substation and will be routed approximately 7 miles to the Fort Sage Substation along a non-exclusive easement. A map depicting a detailed description of the location of the Gen-Tie is attached hereto as **Exhibit "C."**

(c) Appropriately scaled site plan drawings of the proposed utility facility, vicinity maps, and routing maps. (NAC 703.423(1)(c)).

Appropriately scaled site plan drawings, vicinity maps, and routing maps are attached hereto as **Exhibit "D."**

DESCRIPTION OF THE PROPOSED FACILITY

2. A description of the proposed utility facility, including:

(a) The size and nature of the proposed utility facility. (NAC 703.423(2)(a)).

The Project consists primarily of an up to 450 MW alternating current ("AC") Generating Facility; a 345 kV Project Substation; an approximately 7-mile-long, 345 kV overhead Gen-Tie; and an up to 200 MW capacity BESS. Additionally, the Project will require civil infrastructure including access roads, drainage channels, and fencing. The Project will be monitored through several mechanisms, including a supervisory control and data acquisition ("SCADA") system and

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a plant control system ("PCS") from an off-site regional control center. Operations and maintenance ("O&M") activities will be conducted through an off-site regional operations center. The Gen-Tie will also provide a communication path via an optical ground wire ("OPGW") fiber optic cable. The Project Substation will connect to SPPCo's existing Fort Sage Substation, thus providing renewable energy to the electrical transmission grid.

The Project components are discussed further below:

Generating Facility

The Project includes a 450 MW AC Generating Facility, which will capture solar energy through an array of PV panels and convert the sun's light energy directly into direct current ("DC") electrical energy. The key components of the Generating Facility include commercially-proven PV modules, a single-axis tracking module racking system, DC combiner boxes, inverters, and medium-voltage transformers combined into units that are repeated to reach the required capacity. Inverter and transformer manufacturers and capacities would be selected based on cost, efficiency, reliability, and market availability.

An array of high-efficiency PV panels mounted to a single-axis tracking system will convert incoming sunlight to DC electrical energy. The tracking system will rotate throughout the day to optimize production, and will be supported, when practical, by driven piers (piles) directly embedded into the ground. The PV panels will be up to 15 feet high and arranged in series to increase the DC system voltage to approximately 1,500 volts. These series of panels are called "strings" in industry terms and provide the basic building block of power conversion in the solar array. The chosen PV panel will be either crystalline silicon or thin film and would be well-suited for the desert environment due to their durability and reliability.

The strings are combined in the solar field through an above- or below-ground DC collection system and then further grouped together at the inverter stations, where the energy is converted to AC and then stepped up to an intermediate voltage, typically 34.5 kV. The inverter stations will be up to 13 feet high and are typically open-air and well-suited for desert environments. The stations consist of DC collection equipment, utility-scale inverters, and a low- to medium-voltage transformer. The output power from the inverter stations would be fed to the

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AC collection system through an above or below ground collection system. This AC collection system substation would deliver the electricity to the Project Substation, where the voltage would be stepped up to the interconnection voltage.

Project Substation

The Project Substation will serve as a central hub for the 34.5 kV collector circuits from the PV arrays and increase the electricity voltage from 34.5 kV to 345 kV. It will be constructed on approximately 15 acres (including the BESS) located near the northwest corner of the Property. The Project Substation will consist of components up to 100 feet in height, and overhead lines constructed with up to 95-foot-tall poles. A communications microwave at the Project Substation may be placed on a pole up to 150 feet in height.

The Project Substation will include the following components:

- 34.5 kV bus and associated switching devices;
- 345 kV bus and associated switching devices;
- 34.5/345 kV transformers;
- 34.5 kV circuit breakers;
- 345 kV circuit breakers;
- 34.5 kV capacitors (as required);
- Grounding grid;
- Plant Control System; and
- Perimeter security fence.

Gen-Tie

The Project will include a 345 kV Gen-Tie, which will be located within the Gen-Tie Corridor and will extend roughly 2 miles west and 5 miles south from the Project Substation to the existing SPPCo Fort Sage Substation, for a total of 7 miles in length.[1] The Gen-Tie structures

[1] As part of Docket Number 24-06015, the Commission granted permission to construct a similar generation-tie line which would also be located within the Rainbow Way Corridor to Shreem Brzee Solar, LLC ("SBS") in October 2024, as part of a solar generation facility that would be located adjacent to the Project. Additionally, Robert Simmons, Michel Luttrell, and Raymond Boff (owners of NSW) and SBS executed a Memorandum of Understanding in November 2023, in which they agreed to codevelop a transmission facility in a manner that ensures both projects will have access to the electrical transmission grid via the Gen-Tie Corridor. However, because it is uncertain which project will be constructed first, NSW requests authority to construct the Gen-Tie as described in this Application to

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will consist of towers up to 100 feet high, with the span between supporting structures ranging between 200 and 700 feet. Access for construction and maintenance of the Gen-Tie will be via the existing Rainbow Way public right-of-way and utility and access easement which spans the length of the proposed Gen-Tie route.

The design characteristics of the Gen-Tie are listed in Table 1, below.

Table 1. Typical Design Characteristics for a 345 kV Gen-Tie

Feature	345 kV Characteristics
Type of structure	Per SPPCo Design Specifications
Structure Height	Up to 100 feet
Span Length	Between 200-700 feet
Anticipated number of structures	65 to 120
Voltage	345 kV
Conductor size	2 per Phase Bundle up to 795 kcmil ACSR-1.06" dia
Ground clearance of conductor	Minimum 30 feet
Pole foundation depth	19 to 24 feet
ADSS fiber optic cable	Installed on the side of transmission towers, below the 345 kV conductors
OPGW	Strung above the 345 kV conductors

Gen-Tie Interconnection/Point of Change of Ownership Structure

The Project Substation will connect to SPPCo's existing Fort Sage Substation – which is located approximately two miles west and five miles south of the Project Substation – via the Gen-Tie proposed in this Application. The Project point of change of ownership pole will be located at the Fort Sage Substation and will be designed consistent with SPPCo specifications. The size and color of the new steel structure will match existing structures in and around the Fort Sage Substation. The Gen-Tie will provide a communication path via OPGW fiber optic cable

avoid any potential delays that may arise should the previously-permitted neighboring project not come to fruition. In the event that both facilities proceed as planned, the co-development and operation of the Gen-Tie would be subject to the terms of the agreement between the two parties and all relevant FERC open access guidelines for future development in the event that additional developers in the vicinity should seek interconnections. Additionally, the Applicant will seek the Commission's approval as necessary should the need for changes to the Project arise.

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strung above the 345 kV conductor, along with a redundant communication path, typically ADSS fiber optic cable, installed on the Gen-Tie poles below the conductor.

The Project may require network upgrades at the Fort Sage Substation, depending on the results of a System Impact Study and Large Generator Interconnection Agreement process. Potential upgrades may include a new 345 kV terminal, two breakers, three switches, five CCVTs, three lighting arresters, and structures and associated bus work.

BESS

The Project includes construction of a BESS consisting of either large format lithium-ion batteries or alternative battery technologies (such as flow batteries) with a capacity of 200 MW, which will be connected using either an AC- or DC-coupled system, depending on off-taker preference and contract terms. A battery supplier will be selected prior to Project construction, subject to an industry standard pre-qualification process. Regardless of the technology and supplier selected, the BESS will be enclosed in structures that conform with applicable fire standards and will include a temperature control system. The BESS will be unstaffed and will have remote operational control along with periodic inspections or maintenance performed, as necessary.

If selected, an AC-coupled system would be connected to a bi-directional inverter to convert DC energy to AC energy, allowing for energy to flow in or out of the batteries to provide charge and discharge. An AC-coupled system would be located adjacent to the Project Substation and coupled to the PV array at the inverter, AC collection system, or 34.5 kV substation bus. Power switches and relays would protect the system. The system would consist of several housing units similar to shipping containers or buildings. The containers or buildings would occupy approximately up to 6 acres of the 15-acre Project Substation area, depending on the size of the system contracted and technology selected.

If a DC-coupled system is selected, battery units would be stored in containers adjacent to the solar inverters distributed throughout the solar arrays. The solar DC collection and the DC battery connection would connect on a common DC bus at the inverter. The containers would be similar in size (between 20 and 40 feet long) to the solar inverter skids. The charge and discharge

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of the DC-coupled batteries would be controlled by the battery management system. DC-DC converters would be installed between the inverter and the batteries to control the DC voltage at the battery terminal. As is typical for the industry, inverters would be controlled by a central control system. Battery protection would be internal to the battery management systems and control boxes located within the containers and inverters.

Access Roads and Fencing

Access to the Property will be via Fish Springs Road, Rainbow Way, and along an existing private access and utility easement which extends from Rainbow Way to the Property, all of which are either hard-packed gravel or hard-packed dirt roads that also provide access to the Fort Sage Substation. Unpaved access roads will be constructed within the solar facility and around the perimeter of the Property. The perimeter of the Property will be enclosed by a 7-foot-high chain link fence that may be topped with a one-foot barbed wire section. Access to the Property will be controlled (authorized personnel only) by employing swinging or rolling chain link gates. Select gates will be automated to facilitate emergency access for fire department vehicles.

Plant Auxiliary Systems

The Project will include plant auxiliary systems – including lighting and fire protection systems – designed to control, protect, and support the Project during its operational phase. The Project will provide lighting at the Project Substation and Property entrances to provide personnel with illumination for Project Substation O&M under normal conditions and means of ingress/egress under emergency conditions. Lighting will be designed to provide the minimum illumination needed to achieve safety and security objectives and would be downward-facing and shielded to focus illumination on the desired areas only. There will be no lighting in the solar field (with the option to bring in portable lighting as needed), thereby minimizing light trespass on the surrounding properties. During daylight hours, the Project's electrical generation will provide power for plant auxiliaries. During non-daylight hours, the Project would require small amounts of power to keep transformers energized, and for plant lighting and security. The BESS will provide this auxiliary power.

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The Project will include a microprocessor-based PCS, which will provide off-site control, monitoring, alarm, and data storage functions for plant systems from an off-site regional operations center (no permanent O&M building is to be constructed on site) as well as communication with the SCADA system. Redundant capability will be provided for critical PCS components so that no single component failure will cause a plant outage. Underground metal structures installed as part of the Project will have cathodic protection, as necessary, based on soil conditions, to avoid corrosion of metal surfaces.

All project components, including the Generating Facility, Project Substation, Gen-Tie, and BESS, are subject to local fire prevention and suppression standards and are subject to review and approval by the Washoe County Fire Marshal. Accordingly, the following measures have been incorporated into the Project design:

- Compliance with all current building and fire code requirements based on occupancy classification.
- A 30-foot defensible space will be maintained around the perimeter of the Project, in which non-fire-resistive vegetation will be removed.
- Undergrounding of cable runs between modules.
- A 26-foot-wide fire access road to reach Project facilities.
- Roads will consist of native material and gravel, compacted to a minimum of 85 percent.
- Address sign on the main gate, provide a Knoxbox™ or switch at the main access gates, and provide a secondary emergency egress gate with Knoxbox™.
- Fire response access to the Project Site will be available via Rainbow Way.
- All battery, electrical, and instrumentation enclosures and structures will be constructed with an integral (built-in) fire suppression system appropriate for the type of equipment.

(b) The natural resources that will be used during the construction and operation of the proposed utility facilities. (NAC 703.423(2)(b)).

No significant impacts to natural resources are anticipated from the construction or operation of the proposed utility facilities. Natural resources anticipated for construction and operation include typical materials used for the construction of utility-scale solar PV generating

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facilities, such as steel for supports, structures, reinforcing rod, and fencing; silicon, copper, and other metals used in the manufacturing of the PV modules; cable and electronic equipment; cement and aggregate for concrete for foundations; gravel and aggregate for roadways; and mineral oil for transformers. In addition, the primary natural resources anticipated for construction and operation are summarized below.

Water

Water necessary for construction and operation of the Project will be imported to the Project site by truck. During construction, the primary use of water will be for compaction and dust control. Water consumption during construction is anticipated to be approximately 100 acre-feet annually ("AFA") for dust suppression and earthwork over the seven-month construction period.

During Project operations, water use will be limited to panel washing and the potential for periodic dust control and maintenance applications. Panel rinsing is expected to be conducted up to two times annually but may be conducted less frequently depending on site events and conditions. The Applicant estimates that the amount of water required for panel washing twice a year will be less than 1 AFA. Existing off-site water rights and existing water supply facilities will likely be sufficient for all construction and operations activities.

Petroleum

Heavy-duty construction equipment associated with construction activities will rely on diesel fuel, as will haul trucks involved in removing the materials from demolition and excavation. Construction workers will travel to and from the Property throughout the duration of construction. The Applicant assumes that most construction workers will travel to and from the site in gasoline-powered passenger vehicles. Heavy-duty construction equipment of various types will be used during construction. Once operational, the Project will not use petroleum except as necessary for backup generators and maintenance vehicles.

(c) Layout diagrams of the structures at the proposed utility facility and its associated equipment. (NAC 703.423(2)(c)).

A layout diagram is provided in **Exhibit "E."**

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(d) Scaled diagrams of the structures of the proposed utility facility. (NAC 703.423(2)(d)).

Scaled diagrams are provided in **Exhibit "F."**

(e) A statement concerning whether the proposed utility facility is an electric generating plant or the associated facilities of an electric generating plant that uses renewable energy as its primary source of energy to generate electricity. (NAC 703.423(2)(e)).

The proposed utility facilities are the associated facilities of an electric generating plant that uses renewable energy (solar) as its primary source of energy to generate electricity.

SUMMARY OF ENVIRONMENTAL IMPACT STUDIES

3. A copy and summary of any studies which have been made of the environmental impact of the proposed utility facility as required by Subsection 1 of NRS 704.870. (NAC 703.423(3)).

UES prepared an ES for the Project in February 2025. The ES is attached hereto as **Exhibit "G."** The ES describes the existing environment of the Project site and analyzes both the environmental impacts of the Project and proposed mitigation measures for particular resources. *See* ES (Exhibit "G"), at Section 3. The ES identified minimal environmental impacts that would occur during construction, operation, and maintenance of the Project, and any material impacts identified will be mitigated as described in the ES. *Id.*

The following is a summary of the analyses described in the ES, including impacts and mitigation measures:

- Geology, Soils, and Paleontology

The ES describes the existing geological setting of the Project site in the Honey Lake Basin, including soil texture and potential for both wind and soil erosion. *Id.* at Section 3.1.1. The ES concludes that the erosion susceptibility of the soil at the Project site is low, though some potential for soil erosion exists due to the planned soil disturbance and removal of vegetation. *Id.* at Section 3.1.2. However, the Project will adhere to best management practices ("BMPs") for soil protection, thereby minimizing the contribution to cumulative impacts. *Id.* In addition, a

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fugitive dust plan will be developed with mitigation measures to reduce the potential for fugitive dust. *Id.*

Potential impacts related to fault lines near the Project are minor. *Id.* Geologic units in the area have been known to yield an extensive catalog of Blancan and Rancholabrean-aged vertebrate remains. *Id.* However, Project construction plans do not call for excavation or grading to depths that would disturb these units. *Id.*

Adherence to BMPs will minimize potential impacts from erosion and grading. *Id.* at Section 3.1.3. The Project will be constructed to meet the safety standards listed in the Uniform Building code. *Id.* Grading and erosion control plans will be prepared in accordance with the Washoe County's engineer requirements for improvement plans. *Id.* Further, a detailed geotechnical survey will be completed, and grading, soil compaction, and structural design will be implemented in accordance with the recommendations of the geotechnical report during the final design phase of the Project. *Id*. Accordingly, the Project will not result in significant geological impacts. *Id.*

- Water Resources

The ES describes the existing groundwater and surface water at the Project site, concluding that "Waters of the United States" as defined in 33 C.F.R. 328.3(a) are not present and that the Project site is not a potential wetland habitat. *Id.* at Section 3.2.1. The ES concludes that activities associated with construction and operation of the Project will not impact or intercept groundwater. *Id.* at Section 3.2.2. As described above, water for construction activities and for operation of the Project will be provided from an offsite source.

With regard to surface water, sheet flows are expected to be negligibly altered from existing conditions during operations and are expected to percolate into the ground as they have historically. *Id.* While increased soil disturbance during construction could result in increased levels of erosion and sedimentation to the dry lake north of the Property, potential impacts will be minimized using BMPs and mitigation measures. *Id.* For example, the Project will implement standard stormwater BMPs during construction – including erosion controls, soil barriers, sedimentation basins, and site contouring – to minimize runoff of soils and associated

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contaminants; will adhere to a Stormwater Pollution Prevention Plan; and will implement measures designed to prevent spills or other discharges. *Id.* at Section 3.2.3. Overall, the ES concludes that the Project will have "less than significant" impacts on water quality. *Id.*

- Air Quality and Climate

Air emissions associated with the Project will occur primarily during construction and will be chiefly associated with fugitive dust during construction from ground-disturbing activities, including grading, pad construction, and installation of the Gen-Tie, as well as proportionally smaller amounts of emissions associated with engine exhaust. *Id.* at Section 3.3.2. Once operational, the Project will generate relatively small contributions to air emissions from on-road travel of vehicles associated with worker commutes for maintenance activities. *Id.* Accordingly, the ES concludes that air quality impacts associated with both construction and operations will be de minimis with no potential to significantly impact regional air quality. *Id.* Nonetheless, the Project will adhere to mitigation measures, including BMPs for fugitive dust and wind control erosion. *Id.* at Section 3.3.3.

- Biological Resources

The ES outlines the general biological resources (vegetation and wildlife, including special status species) observed or anticipated to occur at and near the Project site. *Id.* at Section 3.4.1. As for vegetation, the Project will result in temporary disturbance within the Property, though no-grading and a low-impact construction method will be implemented for 99% of the Property. *Id.* at Section 3.4.2. While the Project will also result in temporary vegetation disturbance in the Gen-Tie Corridor, the corridor may be narrowed in certain areas to avoid impacts to sensitive habitats and special-status species. *Id.* Potential impacts to wildlife could include loss of foraging and/or nesting habitat, decreased habitat value, disturbance of nesting sites, or habitat fragmentation – the majority of which would be temporary and restored after construction. *Id.* Permanent impacts that may result from Project construction are only anticipated where Project improvements (PV panels, Project Substation, BESS, access/maintenance roads, and fencing) will permanently alter existing habitat. *Id.*

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However, Project impacts to vegetation and wildlife will be minimized through adherence to BMPs and mitigation measures which include worker training; exclusion fencing; restricting vehicle movement and speed at the Project site; and minimizing soil compaction, erosion, and vegetation loss to preserve habitat. *Id.* at Section 3.4.3.

Regarding special status wildlife species, migratory birds (including the Golden Eagle, Greater sage-grouse, and Burrowing Owl) have the highest potential to be directly impacted by the Project. *Id.* at Section 3.4.2. However, the Alkali Desert Scrub and Alkali Flats/Playas habitats which comprise the vast majority of the Project area are not considered prime habitat for these species. *Id.* The Project will adhere to mitigation measures adopted to ensure that the Project will not adversely impact other migratory birds, including scheduling habitat-altering portions of the Project outside of bird breeding season whenever possible, requiring a biologist to survey for nests prior to grading and vegetation removal, and establishing construction buffer zones to accommodate active nest activity as needed. *Id.* at Sections 3.4.2-3.4.3.

- Cultural Resources

Extensive analysis, records searches, and an archeological survey were conducted to assess the cultural resources in the Project vicinity and analyze the Project's impacts. *Id.* at Section 3.5.1. While three new archaeological sites were identified in the Project vicinity during the archeological survey, none are eligible for listing on the National Register of Historic Places ("NRHP"), meaning that Project impacts to these resources will be "considered acceptable and less than significant." *Id.* at Section 3.5.1-3.5.2. Likewise, a previously-recorded large prehistoric artifact scatter located within the vicinity of the Gen-Tie will not be affected. *Id.*

Despite the lack of prehistoric sites eligible for inclusion in the NRHP, the ES establishes mitigation measures, including appropriate spacing of Gen-Tie poles and confining construction activities to established roadways and staging areas, to further ensure that the Project will not negatively impact cultural resources. *Id.* at Section 3.5.3. If potential resources are discovered during Project construction, work would halt immediately and NSW would take appropriate steps to evaluate the resource and determine further mitigation measures as needed. *Id.*

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- Land Use

The Project site is located in the High Desert Planning Area in Washoe County, a sparsely populated area which consists primarily of vacant rangeland that has been dedicated to agricultural uses for nearly a century and is therefore considered previously disturbed. *Id.* at Section 3.6.1. Land use consequences as a result of the Project will be minimal and consistent with the existing and planned future development for the vicinity. *Id.* at Section 3.6.2. Namely, a similar solar energy generation facility currently exists in the area surrounding the Project site, and development of the Project will not conflict with any current or known authorized land uses. *Id.* Because the Project will have no adverse effect on current or known future land use activities in the area, mitigation measures are not warranted. *Id.* at Section 3.6.3.

- Transportation and Traffic

The ES analyzes the existing Project vicinity in terms of roadways and traffic volume. *Id.* at Section 3.7.1. During construction, the Project will temporarily increase traffic in the area, though no impacts to level of service are anticipated. *Id.* at Section 3.7.2. Traffic is also expected to increase minimally as a result of occasional site visits for maintenance operations, but daily operational activities will be conducted from an offsite location. *Id.* Overall, the ES concludes that the Project will not result in substantive impacts to traffic conditions, and therefore mitigation measures are not warranted. *Id.* at Section 3.7.3.

- Visual Resources

Project construction will impact the existing local landscape. *Id.* at Section 3.8.2. However, due to the remote nature of the Project site and the presence of existing development in the vicinity – including military installations, the Union Pacific Railroad, the Alturas Interconnection Transmission line, natural gas line facilities, and nearby solar facilities – the Project will minimally impact the viewshed. *Id.* at Section 3.8.1-3.8.2. Nor will the Project be visible to the nearest residential, industrial, institutional, or commercial properties due to either distance or terrain. *Id.* at Section 3.8.2. Because potential impacts to visual character are consistent with the existing setting, the ES concludes that mitigation is not warranted. *Id.* at Section 3.8.3.

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- Noise

The Project is located in a rural area near the Union Pacific Railroad, which runs just north of the Property, contributing to the noise environment. *Id.* at Section 3.9.1. Project construction will result in temporary and intermittent increases in ambient noise levels for approximately 7 months, with timeframes for heavy equipment activities to occur at small intervals over the Project construction timeframe, primarily during the first few weeks of site preparation and earthwork. *Id.* at Section 3.9.2. However, because the nearest residences are located in Herlong, more than nine miles west of the Project site, noise levels during construction will remain within an acceptable range to the nearest sensitive receptors, and visual obstruction will provide additional noise-reducing barriers. *Id.* Therefore, construction noise impacts will be temporary and less than significant. *Id.*

During Project operations, noise impacts associated with air conditioning units for the BESS will be similarly limited due to the distance to the closest sensitive noise receptors and visual obstruction efforts, including locating the air conditioning units within storage enclosures. *Id.* Accordingly, the ES concludes that the Project will not create significant noise impacts. *Id.* Nonetheless, the Project will adhere to a typical construction schedule to further mitigate the minimal impacts associated with the construction phase. *Id.* at Section 3.9.3.

- Waste Management and Hazardous Materials

During construction, the Project will generate solid waste in the form of soil and brush from clearing and grubbing, as well as materials from installation of the PV panels, Gen-Tie, BESS, Project Substation components, access roads, etc. *Id.* at Section 3.10.2. Likewise, Project operations will generate limited amounts of solid waste associated with maintenance activities. *Id.* All waste generated during both construction and operations will be disposed of at a licensed waste management facility. *Id.*

During construction, the Project may require minimal volumes of vehicle fuels, lubricating oils, paints, adhesives, and sealants, though the ordinary use of these materials would not generate hazardous wastes. *Id.* Further, as construction contractors will be required to comply with environmental and workplace safety laws and procedures, no substantive risks to public

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health and safety are expected. *Id.* Thus, the construction and operation of the Project is not expected to require the transportation, use, or generation of hazardous materials or hazardous wastes that could create a potential hazard to the public or environment. *Id.* Finally, the implementation of BMPs and mitigation measures – including maintaining spill cleanup kits onsite and preparing an operational Environmental Health and Safety Plan – will prevent and reduce potential impacts associated with hazardous wastes. *Id.* at Section 3.10.3.

- Socioeconomics

During the 7 months of construction, the Project will generate temporary employment primarily for local residents, with approximately 200 workers anticipated during peak activity. *Id.* at Section 3.11.2. Additionally, a small amount of the workforce is expected to require specialty skills and will either relocate to the region temporarily or permanently, thereby contributing to the local economy and supporting other businesses in the area. *Id.* This is expected to have a very minor impact on population and temporary housing in the region. *Id.* Sales and property taxes associated with the successful construction and operation of the Project will benefit both the state of Nevada and Washoe County. *Id.*

Due to the limited number of nearby residents, no environmental justice populations will be unduly affected by the Project. *Id.* Because Project construction and operations will not result in long-term or adverse health or environmental impacts, there will be no disproportionate or adverse effects to these residents. *Id.* Finally, because potential impacts to socioeconomic conditions will likely be beneficial, no mitigation measures are required. *Id.* at Section 3.11.3.

DESCRIPTION OF ALTERNATE LOCATIONS

4. Description of reasonable alternate locations for the proposed utility facility, a description of the comparative merits of the detriments of each location submitted, and a statement of the reasons why the location is best suited for the proposed facility, as required by Subsection 1 of NRS 704.870. (NAC 703.423(4)).

The selected location is best suited for the Project. *See id.* at Section 2.5. The Applicant's primary objectives were to locate the Project in an area of Northern Nevada such that: (1) the length of the Gen-Tie interconnection to the electrical grid would not exceed 10 miles to minimize

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Gen-Tie losses and costs; and (2) necessary land rights for the Gen-Tie route are in place. The Applicant considered the following additional criteria in evaluating appropriate sites for the Project:

- Adequate solar irradiation;
- Close proximity to a high-capacity substation with access to the SPPCo grid;
- Adequate transmission capacity to convey the electrical output of the Project;
- Minimal environmental concerns;
- Relatively flat site to minimize the need for site grading;
- Existing access to accommodate construction workforce needs;
- Land parcel large enough to accommodate a utility-scale solar facility; and
- Access to nearby workforce to support Project construction.

Id. at Section 2.5.1.

The Applicant performed a regional evaluation of available sites and found that the proposed Project site best fits all the criteria necessary for the Project and meets all of the Project's siting objectives. The Project is located in Northern Nevada and poses minimal environmental concerns, as described in Section III(3) of this Application. The Property is located approximately four miles northeast of the existing Fort Sage Substation, minimizing the length of the Gen-Tie to be constructed. *Id.* at Section 2.5.2. Additionally, the remote location of the Project with respect to population centers minimizes the potential for impacts affecting the local population. *Id.* at Section 2.5.1. Noise, visual, and traffic impacts are all minimized by the Project's remote location. *Id.*

The Applicant considered a possible alternative Gen-Tie route for the Project which would have extended along Honey Lake Way and bypassed the junction with Anaho Road to then connect with the Fort Sage Substation. *Id.* at Section 2.5.3. However, the Applicant eliminated this option because it would have required amendments to the Truckee Meadows Regional

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Planning Agency's Regional Utility Corridors.[2] *Id.* Therefore, no reasonable cost-effective alternate locations for the Project exist outside of proposed Project site.

PROOF OF PUBLIC NOTICE

5. A copy of the public notice of the application or amended application and proof of the publication of the public notice, as required by Subsection 4 of NRS 704.870. (NAC 703.423(5)).

A copy of the public notice of this Application is attached as **Exhibit "H,"** and an affidavit demonstrating proof of publication of the public notice of this Application in the Reno Gazette Journal is attached as **Exhibit "I."**

PROOF OF SUBMITTAL TO THE NEVADA STATE CLEARINGHOUSE

6. Proof that a copy of the application or amended application has been submitted to the Nevada State Clearinghouse within the Department of Administration to enable energy review and comment. (NAC 703.423(6)).

Proof of submission of this Application to the Nevada State Clearinghouse to enable agency review and comment, and proof of service on local governments in the area in which the facilities are to be located, is attached as **Exhibit "J."**

PROBABLE EFFECT ON ENVIRONMENT

7. An explanation of the nature of the probable effect on the environment including:

(a) A reference to any studies described in Subsection 3, if applicable; (NAC 703.423(7)(a)) and

UES's analysis of the proposed Project is contained in the ES (Exhibit "G").

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[2] In the event the Applicant is unable to co-develop the Gen-Tie Corridor with previously-permitted projects as described in footnote one of this Application, the Applicant may revisit this alternative. However, the Applicant will seek the Commission's approval as necessary should the need for changes to the Project arise.

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(b) An environmental statement that includes:

(1) The name, qualifications, professions and contact information of each person with primary responsibility for the preparation of the environmental statement; (NAC 703.423(7)(b)(l))

Those responsible for preparing and reviewing the ES, and their respective qualifications, professions, and contact information, are listed in Table 2, below.

Table 2. List of Preparers and Reviewers of the ES

Name	Title	Project Role	Email
UES, 6995 Sierra Center Parkway, Reno, NV 89511			
Austin Kent Moore	Environmental Planner	Project Manager	amoore1@teamues.com
Cagnei Duncan	Staff Scientist	Report Preparer	cduncan1@teamues.com
Ben Klink	Biological Program Manager	Biologist	bklink@teamues.com
Brian Mayerle	Principal Biologist	Biologist	bmayerle@teamues.com
Teresa Campbell, MS	Staff Biologist	Biologist	tcampbell@teamues.com
David Miceli	Biologist/GIS Analyst	Biologist/GIS	dmiceli@teamues.com
Tessa Behnke	Staff Biologist	Biologist	tbehnke@teamues.com
Meaghan Davis	Biologist/Botanist	Botanist	mdavis1@teamues.com
Nicole Higgins	Biologist/Botanist	Botanist	nhiggins@teamues.com
Brendan Kallaus	Geologist	Geologist	bkallaus@teamues.com
Nelson Pearson, PE	Geotechnical Project Manager	Geotechnical Engineer	npearson@teamues.com
Katie Bates, E.I.	Geotechnical Professional	Geotechnical Staff	kbates@teamues.com
Dr. John Gorcyzk, Ph.D., R.P.A.	Senior Archaeologist	Cultural Resources	jgorcyzk@teamues.com
Justin Fike, PE	Senior Hydrologist	Senior Hydrologist	jfike@teamues.com
Tony Dimple	Area Director, Northern Nevada	Project Administrator	tdimpel@teamues.com
Brent Moore, CEP	Principal Environmental Scientist	QA/QC Reviewer	Bmoore1@teamues.com
Kurt Schlyer	Environmental Planner	Environmental Planner	kshclyer@teamues.com
Kritsi Auxier	Director of Marketing and Communications	Technical Editor	kauxier@teamues.com
Sean Simpson, R.P.A.	Archaeologist	Cultural Resources	simpson@mesafieldservices.com
eGridPlanning, Inc.			
Kevin Feusi	Electrical Engineer	Electrical Engineer	kfeusi@egridplanning.com

Additional information is available at Section 4 of the ES (Exhibit "G").

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(2) The name, qualifications, professions and contact information of each person who has provided comments or input in the preparation of the environmental statement; (NAC 703.423(7)(b)(2))

A list of each person who provided comments or input on the preparation of the ES, and their respective qualifications, professions, and contact information is available in Table 2, above. Additional information is available at Section 4 of the ES (Exhibit "G").

(3) A bibliography of materials used in the preparation of the environmental statement; (NAC 703.423(7)(b)(3)) and

A list of references used in preparation of the ES is available at Section 5 of the ES (Exhibit "G").

(4) A description of: (NAC 703.423(7)(b)(4))

(I) The environmental characteristics of the project area existing at the time the application or amended application is filed with the Commission;

The Project site (comprised of both the Property and the Gen-Tie Corridor) are located within the sparsely populated Honey Lake Valley, approximately 40 miles north of the City of Reno. The Project is located near the Nevada/California state line, approximately 9 miles east of the community of Herlong, CA. The site is currently vacant rangeland. The site is bordered on the north, south, east, and west by vacant land. The Union Pacific railway runs just north of the Property. Access to the Property would be from an existing private access and utility easement, Rainbow Way, and Fish Springs Road.

The Project site lies within the High Desert Planning Area in Washoe County and is zoned as "General Rural." *See* ES (Exhibit "G"), at Section 3.6.1. The Project will be located on vacant land that has been at least partially previously disturbed by agricultural resources and construction of existing infrastructure including a rail line, an electric transmission line, and gas pipelines. *Id.* As described above, the Fort Sage Substation is located approximately four miles southwest of the southeast corner of the Property. Section 3 of the ES (Exhibit "G") further describes the existing setting and environmental characteristics with respect to each of the resources studied.

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(II) The environmental impacts that the construction and operation of the proposed utility facility will have on the project area before mitigation; and

The Project will result in the disturbance of approximately 1,692 acres of land in total, and construction will last up to approximately 7 months. The ES analyzed potential impacts on a variety of resources, and it identified minimal environmental impacts that will occur during Project construction and operations. *Id.* at Section 3. As more thoroughly described in Section III(3) of this Application, the ES concludes that the impacts of the Project will not substantively impact the environment, and that Project-specific mitigation measures will otherwise serve to mitigate any material adverse impacts on the environment. *See id.*

Additionally, because Project disturbance will be limited to private land, the Project is exempt from Nevada law requiring coordination and mitigation with the Sagebrush Ecosystem Technical Team ("SETT") of the Nevada Department of Conservation and Natural Resources. *See* NAC 232.470; NAC 232.475. Nonetheless, the Applicant reached out to the SETT, and the SETT Program Manager confirmed via email on July 30, 2025 that the Project falls under an exemption process.

(III) The environmental impacts that the construction and operation of the proposed utility facility will have on the project area after mitigation.

Analyses of the environmental impacts of the Project are included in Section 3 of the ES (Exhibit "G").

NEED TO ENSURE RELIABLE SERVICE

8. An explanation of the extent to which the proposed utility facility is needed to ensure reliable utility service to customers in this State. (NAC 703.423(8)).

The Project is exempt from this requirement pursuant to NRS 704.890(1)(b). NRS 704.890(1)(b) provides that the Commission must find that a utility facility is needed to ensure reliable utility service to customers in Nevada *only* if (i) the utility facility emits greenhouse gases and (ii) does not use renewable energy as its primary source of energy to generate electricity.

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Here, because the Project uses renewable energy as its primary source of energy, NRS 704.890(1)(b)'s finding does not need to be made, and thus the Project is exempt from NAC 703.423(8)'s requirement to explain why the Project is needed to ensure reliable utility service to customers in Nevada. With that said, the Applicant provides responses to the following subsections of NAC 703.423(8)(b) as background information.

(a) A description of the extent to which the proposed utility facility will provide utility service to customers in this state. (NAC 703.423(8)(b)(1)).

The Project will provide renewable energy to the electrical transmission grid via the Fort Sage Substation. Additionally, the Project will generate electrical energy and store energy to reduce emissions of CO_2, a greenhouse gas, by displacing the use of electrical energy from natural gas, coal-burning, and thermal power plants.

(b) A description of the extent to which the proposed utility facility will enhance the reliability of the utility service in this state. (NAC 703.423(8)(b)(2)).

The Project will assist the State of Nevada in developing reliable renewable resources of energy and displacing conventional thermal power generation by supporting the construction of a solar electric generating facility. The Project will provide a reliable local and regional source of power, producing up to approximately 1,146,488 megawatt-hours ("MWh") of clean, emissions-free power each year. In doing so, the Project will fulfill a need for reliable and affordable clean energy in Nevada pursuant to Nevada's Renewable Portfolio Standard (NRS 704.7801-.7828, *inclusive*, collectively, the "RPS"). The Project also includes an energy storage component that will facilitate grid reliability in providing energy delivery during peak demand periods.

(c) A description of the extent to which the proposed utility facility will achieve interstate benefits by the proposed construction or modification of transmission facility in the state, if applicable. (NAC 703.423(8)(b)(3)).

NAC 703.423(8)(b)(3) is not applicable. All transmission infrastructure associated with the Project is located within the State of Nevada.

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NEED VERSUS ENVIRONMENTAL EFFECT

9. An explanation of how the need for the proposed utility facility as described in Subsection 8 balances any adverse effects on the environment as described in Subsection 7. (NAC 703.423(9)).

The need for the Project outweighs the minor environmental impacts of the Project. The Project will provide a reliable local and regional source of power, producing approximately 1,146,488 MWh of clean, emissions-free power each year, which is helpful to fulfill an environmental need for reliable and affordable clean energy in Nevada. In the last several years, the Nevada Legislature has adopted increased RPS requirements to be phased in through 2030, ultimately requiring that 50 percent of the electricity sold by an electric utility to retail customers in Nevada must come from renewable sources by 2030. If the Applicant enters into a power purchase agreement with an entity subject to the RPS, the Project will help Nevada achieve its renewable energy goals. The Project includes an energy storage component that will fulfill a need for renewable energy storage and facilitate grid reliability by providing energy delivery during peak demand periods. The Project will also allow for the reduction of approximately 700,000 tons of CO_2 annually.

Additionally, the Project will generate up to approximately $1,450,000.00 in annual property taxes to Washoe County during the first 20 years of operation assuming the Project receives a Nevada Governor's Office of Energy Renewable Energy Tax Abatement ("RETA"), and approximately $2,900,000.00 annually thereafter (subject to changes in the assessed value of the Project over its operational life), along with approximately $22 million in sales and use tax receipts payable to the State of Nevada. Finally, the Project will further benefit the economy by generating up to approximately 200 jobs at peak construction, with an average workforce of approximately 150 construction workers. The Project will also employ approximately 5 permanent employees during operations.

In contrast, with the implementation of the recommended mitigation measures, the Project will result in only minor impacts to the natural environment. *See* ES (Exhibit "G"), at Section 3.

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Thus, by reducing annual carbon emissions in the State of Nevada and providing a reliable energy source for the power grid, the Project's benefits outweigh its minimal environmental effects.

MINIMUM ADVERSE IMPACT ON THE ENVIRONMENT

10. An explanation of how the proposed utility facility represents the minimum adverse effect on the environment, including (NAC 703.423(10))

(a) The state of available technology; (NAC 703.423(10)(a))

The Project will use the latest and best commercially available materials for the generation of electricity from a renewable resource. Through implementation of identified mitigation measures and BMPs, the Project will represent the minimum adverse effect on the environment.

(b) The nature of various alternatives; and (NAC 703.423(10)(b))

No reasonable alternative locations meeting the Applicant's criteria for the Project were identified outside of the Project site. *See* Section III(4), *supra*. The proposed Project site allows for minimal environmental impacts as described in the ES (Exhibit "G"), and existing facilities adjacent to the Property provide interconnection with a relatively short Gen-Tie, minimizing construction and surface disturbance needs as compared with other potential sites. The Applicant considered and eliminated an alternative Gen-Tie route because it would have required amendments to the Truckee Meadows Regional Planning Agency's Regional Utility Corridors.

Further, the Project is designed to utilize crystalline silicon or thin-film PV technology, which was selected as the preferred technology given its low water requirements and reliable, proven technology. *Id.* at Section 2.5.3. Other solar technologies that the Applicant considered for the Project included concentrating PV and solar thermal technologies, both of which were determined to have a greater potential for adverse environmental impact due to long-term water requirements, and concentrating solar would also have greater impacts on visual and biological resources. *Id.* Therefore, these options were eliminated from further consideration. *Id.* For the foregoing reasons, the Project design proposed in this Application represents the minimum adverse effect on the environment.

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(c) The economics of various alternatives. (NAC 703.423(10)(c))

The proposed Project site is the most cost-effective option for the Project because it will allow the Project to utilize existing transmission infrastructure to minimize the length of the Gen-Tie to the electrical grid, which minimizes line losses and costs. *See* Section III(4), *supra*.

AGENCY APPROVAL LIST AND DESCRIPTION OF REQUIRED PERMITS

11. An explanation of how the location of the proposed utility facility conforms to applicable state and local laws and regulations, including a list of all permits, licenses, and approvals required by federal, state and local statutes, regulations and ordinances. The explanation must include a list that indicates: (NAC 703.423(11))

(a) All permits, licenses, and approvals the applicant has obtained, including copies thereof; (NAC 703.423(11)(a)) and

A list of all permits, licenses, and approvals the Applicant or its contractors either have obtained or are in the process of obtaining in order to commence construction, and an estimated timeline for obtaining these permits, is provided in **Exhibit "K."** Included as **Attachment 1 to Exhibit "K"** is the Nevada Department of Wildlife's August 26, 2025 confirmation of receipt of the Applicant's application and payment for the energy review program established under NRS 701.600-701.640.

(b) All permits, licenses and approvals the applicant is in the process of obtaining to commence construction of the proposed utility facility. The applicant must provide an estimated timeline for obtaining these permits, licenses and approvals. (NAC 703.423(11)(b)).

A list of all permits, licenses, and approvals the Applicant or its contractors either have obtained or are in the process of obtaining in order to commence construction, and an estimated timeline for obtaining these permits, is provided in Exhibit "K."

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SERVING THE PUBLIC INTEREST

12. An explanation of how the proposed utility facility will serve the public interest, including: (NAC 703.423(12))

(a) The economic benefits that the proposed utility facility will bring to the applicant and this State; (NAC 703.423(12)(a))

The Project will have a direct beneficial impact on the local and regional economy during the construction period, which is expected to last approximately 7 months in total. The Project will provide an opportunity for construction jobs because at peak construction, approximately 200 workers are anticipated, with an average anticipated workforce of approximately 150 construction workers. The Project will also provide up to 5 full-time jobs once operational. In addition, the Project will contribute approximately $1,450,000.00 in annual property taxes to Washoe County during the first 20 years of operation assuming the Nevada RETA applies and approximately $2,900,000.00 annually thereafter (subject to changes in the assessed value of the Project over its operational life). The Project will also generate approximately $22 million in sales and use tax receipts payable to the State of Nevada.

Further, the Project will provide a reliable source of electricity for the grid, which will benefit the economy in the long term by ensuring that electricity is continuously provided by sources within the state. By providing a diverse source of electricity, the Project will help bring stability to the markets that serve consumers. For these reasons, solar energy projects are beneficial to the Nevada economy as a whole.

(b) The nature of the probable effect on the environment in this State if the proposed utility facility is constructed; (NAC 703.423(12)(b))

The ES contains a full analysis of the minimal probable environmental effects of the Project. *See* ES (Exhibit "G"), at Section 3. Moreover, once operational, the Project will have a positive effect on the environment. The Project will provide a reliable and consistent source of electricity, while reducing CO_2 emissions in the state by approximately 700,000 tons annually.

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(c) The nature of the probable effect on the public health, safety, and welfare of the residents of this State if the proposed utility facility is constructed; (NAC 703.423(12)(c)) and

The Project will provide a clean, renewable source of energy and will not emit material quantities of pollutants or greenhouse gases that could have an adverse impact on the public health, safety, and welfare of Nevada residents. In fact, the Project's production of solar energy will displace energy production using fossil fuels such as coal and natural gas. As stated previously, the State of Nevada will benefit from the creation of jobs during construction and operation, income from the Project, and the reduction of CO_2 emissions by approximately 700,000 tons annually. Diversification of electricity sources is known to bring stability to the markets that serve consumers; thus, the 1,146,488 MWh of clean, emissions-free power generated by the Project each year will benefit the residents of Nevada. In addition, construction and operation procedures will adhere to mitigation measures and design features intended to reduce the risk of exposure to hazardous materials, excessive noise, and other harmful conditions.

(d) The interstate benefits expected to be achieved by the proposed electric transmission facility in this State, if applicable. (NAC 703.423(12)(d)).

Construction of the Gen-Tie will likely not increase interstate deliverability options for renewable energy generated at the Project, as the Project will interconnect to SPPCo's Fort Sage Substation.

IV. CONSTRUCTION IN MULTIPLE PHASES

Should the Commission grant this Application subject to the Applicant's submission of outstanding compliance items, the Applicant requests that the Commission's compliance order allow for the issuance of four permits to construct for four phases of construction. The Applicant proposes that the phases may be constructed either simultaneously or independent of one another with some overlap in time, but no construction of any utility facility necessary to the Project will occur until the Applicant has satisfied the Commission that all necessary permits have been obtained for construction of that particular facility, consistent with the intent of UEPA. The

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phases of construction, along with information about the outstanding state and local permits that must be obtained for each phase prior to issuance of a PTC, are outlined below.

Phase 1: This phase of construction will include grading of the site for the Generating Facility and Project Substation. During this phase, temporary construction facilities such as laydown areas and installation of construction trailers would be established. Phase 1 permits that will be acquired prior to commencing construction of this phase are listed below.

PHASE 1: SITE GRADING & TEMPORARY CONSTRUCTION FACILITIES		
REQUIRED PERMIT	**ISSUING AGENCY**	**ESTIMATED APPROVAL DATE**
Special Use Permit and Major Grading approvals	Washoe County	Q4 2025
Dust Permit	Washoe County	Q1 2026
Fugitive Dust Permit	Nevada Department of Environmental Protection	Q4 2025
Water Discharge Permit	Nevada Department of Environmental Protection	Q4 2025
Confirmation of receipt of Application and payment for energy review program under NRS 701.600-701.640	Nevada Department of Wildlife	Q3 2025

Phase 2: This phase will include construction of the Generating Facility (which will consist of activities including installing structural poles and trackers, panels, electrical system, and inverters) and access roads. Phase 2 permits that will be acquired prior to commencing construction of this phase are listed below.

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PHASE 2: GENERATING FACILITY & ACCESS ROADS		
REQUIRED PERMIT	**ISSUING AGENCY**	**ESTIMATED APPROVAL DATE**
Special Use Permit and Major Grading approvals	Washoe County	Q4 2025
Dust Permit	Washoe County	Q1 2026
Fugitive Dust Permit	Nevada Department of Environmental Protection	Q4 2025
Water Discharge Permit	Nevada Department of Environmental Protection	Q4 2025
Building and Grading Permit	Washoe County	Q1 2026

Phase 3: This phase will include construction of the Project Substation and BESS. Activities will include installation of the Project Substation grounding facilities, the main transformer, metering equipment, and other Project Substation electrical equipment. Phase 3 permits that will be acquired prior to commencing construction of this phase are listed below.

PHASE 3: PROJECT SUBSTATION & BESS		
REQUIRED PERMIT	**ISSUING AGENCY**	**ESTIMATED APPROVAL DATE**
Special Use Permit and Major Grading approvals	Washoe County	Q4 2025
Dust Permit	Washoe County	Q1 2026
Fugitive Dust Permit	Nevada Department of Environmental Protection	Q4 2025
Water Discharge Permit	Nevada Department of Environmental Protection	Q4 2025
Building and Grading Permit	Washoe County	Q1 2026

Phase 4: This phase will include construction of the Gen-Tie, which will connect the Project Substation to SPPCo's existing Fort Sage Substation. Additionally, any necessary improvements to the Fort Sage Substation will be performed, such as installation of relays and transmission protection equipment, as part of this phase. The Applicant anticipates that the

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construction schedule may be independent of Phases 1 through 3 depending on the EPC contractor's scheduling needs. Phase 4 permits that will be acquired prior to commencing construction of this phase are listed below.

PHASE 4: GEN-TIE		
REQUIRED PERMIT	**ISSUING AGENCY**	**ESTIMATED APPROVAL DATE**
Special Use Permit approvals	Washoe County	Q4 2025
Dust Permit	Washoe County	Q1 2026
Fugitive Dust Permit	Nevada Department of Environmental Protection	Q4 2025

V. CONCLUSION AND REQUEST FOR RELIEF

The Applicant respectfully requests that the Commission:

1. approve this Application and issue a UEPA Permit to Construct for the Project, subject to the Applicant's submission of the permits described herein to the Commission; and

2. issue a compliance order authorizing the construction of the utility facilities in four phases as described herein by authorizing four Permits to Construct, with each Permit to Construct specifying the utility facility or facilities in that phase.

The Applicant reserves the right to amend and supplement this Application as permitted and contemplated pursuant to NRS 704.820 to 704.900 and NAC 703.415 to 703.427.

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Dated and respectfully submitted this 1st day of October, 2025.

HOLLAND & HART LLP

/s/ Bryce C. Alstead

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EXHIBIT A

Project Location Map



△ Project Location

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0 60,000 120,000

Feet

Aerial imagery provided by Esri.
Projection: NAD 1983 2011 StatePlane California II FIPS 0402 Ft US

UES

PROJECT LOCATION MAP

NVSolarWRX PROJECT

Washoe County, Nevada

EXHIBIT	A
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025

EXHIBIT B

Legal Description of the Property

LEGAL DESCRIPTION OF THE NVSOLARWRX PROJECT SITE

The land is situated in the County of Washoe, State of Nevada, within Washoe County Assessor's Parcel Numbers (APN) 074-103-01 (*640 +/- acres*); APN 074-103-05 (*320 +/- acres*); APN 074-451-20 (*80 +/- acres*) and APN 074-452-01 (*639.94+/- acres*) for a total solar project area of one thousand six hundred and eighty acres (*1,680 +/- acres*).

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE UNINCORPORATED AREA IN COUNTY OF WASHOE, STATE OF NEVADA AND IS DESCRIBED AS FOLLOWS:

APN: 074-103-01 (640 +/- acres)

All that certain property situate in Section 11; Township 26 North, Range 18 East, 640 acres more or less, Mount Diablo Base and Meridian, according to the Official Plat of the survey of the Public Lands, as made by the United States Surveyor-General for the District of Nevada.

APN: 074-103-05 (320 +/- acres)

All that certain property situate in the north half (1/2) of Section 12; Township 26 North, Range 18 East, 320 acres more or less, Mount Diablo Base and Meridian, according to the Official Plat of the survey of the Public Lands, as made by the United States Surveyor-General for the District of Nevada.

APN: 074-451-20 (80 +/- acres)

All that certain property situate in the south half (1/2) of the southeast quarter (1/4) of Section 1; Township 26 North, Range 18 East, 80 acres more or less, Mount Diablo Base and Meridian, according to the Official Plat of the survey of the Public Lands, as made by the United States Surveyor-General for the District of Nevada.

APN: 074-452-01 (639.94 +/- acres)

All that certain property situate in Section 2; Township 26 North, Range 18 East, 639.94 acres more or less, Mount Diablo Base and Meridian, according to the Official Plat of the survey of the Public Lands, as made by the United States Surveyor-General for the District of Nevada.

EXHIBIT C

Detailed Description of the Location of the Gen-Tie



Exhibit C – Detail of Gen-Tie Line Location
NVSolarWRX Project
Washoe County, NV

Date:
Feb 2025

Scale:
As Shown

Exhibit C

EXHIBIT D

Site Plan Drawings, Vicinity Maps,

& Routing Maps



PROJECT VICINITY MAP

NVSolarWRX PSES/BESS Project
Washoe County, NV

EXHIBIT	D
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025



△ Project Location

N

0 60,000 120,000

Feet

Aerial imagery provided by Esri.
Projection: NAD 1983 2011 StatePlane California II FIPS 0402 Ft US

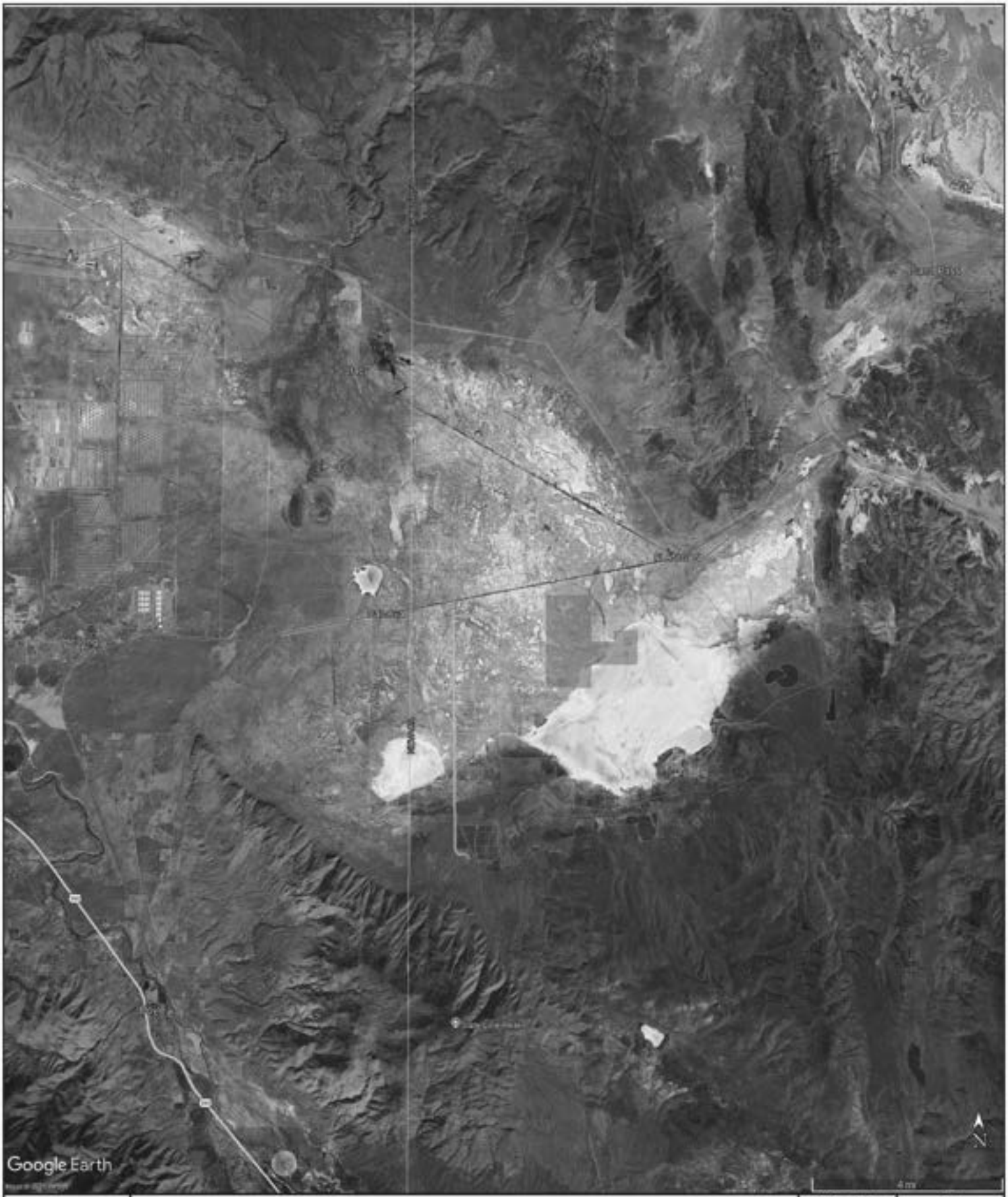
UES

PROJECT LOCATION MAP

NVSolarWRX PSES/BESS Project

Washoe County, NV

FIGURE	1
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025
41402300008.0000	



PROJECT VICINITY MAP

NVSolarWRX PSES/BESS Project
Washoe County, NV

FIGURE	2
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025
PROJECT NO.	108.0000



PROJECT BOUNDARY MAP

NVSolarWRX PSES/BESS Project
Washoe County, NV

FIGURE	3
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025
PROJECT NO.	0108.0000



SYSTEM SPECIFICATIONS	
MODULE MANUFACTURER	JINKO SOLAR
MODULE MODEL	JKM540M-72HL4-TV
MODULE RATING	540 W
TOTAL MODULE QTY	773,064
MODULES PER STRING	27
TOTAL NUMBER OF STRINGS	28,632
SYSTEM SIZE DC	417 MW

JINKO 540W MODULE DIMENSION

GCR TABLE			
	FEET	METER	
X	7.46	2.27	MODULE WIDTH
Y	11.19	3.41	AISLE WIDTH
Z	18.65	5.69	PITCH
GCR	40.0%		= X/Z = (Z-Y)/Z

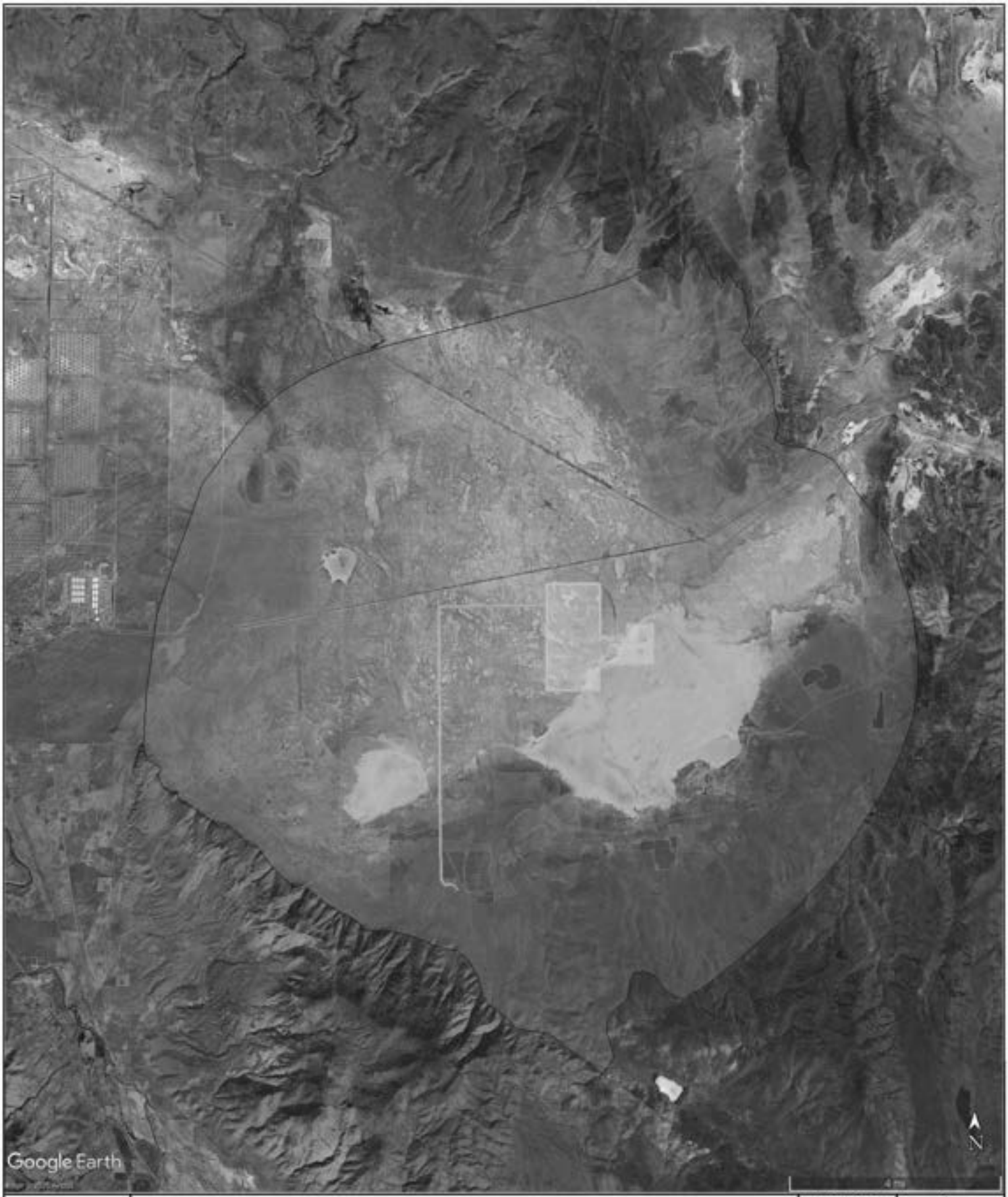
PRELIMINARY
NOT FOR
CONSTRUCTION

UES

Site Layout
NVSolarWRX
Washoe County, Nevada

Date: FEB 2025

NVSolarWRX App. Vol. 1
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UES

VIEWSHED MAP

NVSolarWRX PSES/BESS Project
Washoe County, NV

FIGURE	6
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025
PROJECT NO.	108.0000



UES

Gen-Tie Routing Map
NVSolarWRX PSES/BESS Project
Washoe County, NV

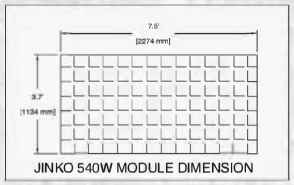
Exhibit	D
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025
PROJECT NO.	0108.0000

EXHIBIT E

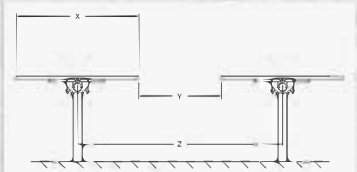
Layout Diagram



SYSTEM SPECIFICATIONS	
MODULE MANUFACTURER	JINKO SOLAR
MODULE MODEL	JKM540M-72HL4TV
MODULE RATING	540 W
TOTAL MODULE QTY	773,064
MODULES PER STRING	27
TOTAL NUMBER OF STRINGS	28632
SYSTEM SIZE DC	417 MW



JINKO 540W MODULE DIMENSION



GCR TABLE			
	FEET	METER	
X	7.46	2.27	MODULE WIDTH
Y	11.19	3.41	AISLE WIDTH
Z	18.65	5.69	PITCH
GCR	40.0%		= XZ = (Z-Y)/Z

PRELIMINARY
NOT FOR
CONSTRUCTION

UES

EXHIBIT E: Layout Diagram
NVSolarWRX
Washoe County, Nevada

Date: FEB 2025

EXHIBIT F

Scaled Diagrams of Utility Structures

BATTERY ENERGY STORAGE SYSTEM

PowinEnergy



POWIN 40FT BATTERY ENCLOSURE

40FT BATTERY ENCLOSURE

Powin Energy's cost effective 40ft enclosure is a scalable, purpose-built battery solution that includes all of the balance of system (BOS) equipment that can be modified to meet the AHJ's requirements. The thermal management of this enclosure has been meticulously designed through air ducting and HVAC, providing an optimal temperature controlled environment for the battery enabling deployment in many different geographical climate types.

FULLY INTEGRATED

- Up to 16 Stack140s or 14 Stack225s per enclosure in parallel
- Powin's patented bp-OS Battery Management System
- Energy Management System (EMS)
- HVAC and forced air with ducting that directly targets the stacks
- AC breaker panel for coms and aux loads
- Fire suppression system that also provides detection and monitoring
- DC Collection, cable and tray
- IP 54 rated
- Insulation options for hot and cold climates
- Isolation, and over current and fault protection
- Minimal on site installation requirements

COMMUNICATION CABINET

- Full state of awareness monitoring for fire suppression/ HVAC/inverter and transformer status/E stop/UPS aux
- Switch
- Router
- UPS – Control
- Linux computer
- HMI
- Controls interface can connect to any SCADA system

CONTACT US powinenergy.com sales@powinenergy.com

POWIN ENERGY 40FT TECHNICAL SPECIFICATIONS

Powin Energy

ELECTRICAL CHARACTERISTICS		
MODEL	**Block2.2**	**Block3.1**
Intended Use	Power Applications	Energy Applications
Battery Chemistry	Lithium Iron Phosphate [LFP]	Lithium Iron Phosphate [LFP]
BMS	Powin bp-OS	Powin bp-OS
Usable Energy Capacity (kWh)	2,240	3,150
Rated Power (kW)	2,240	2,800
DC Voltage Range (VDC)	762-993	739-963
Max Current [Charge / Discharge]* (A)	3,840 / 3,840	3,024 / 3,794
Depth of Discharge (%)	100	100
DC Round Trip Efficiency [2 hr rating] (%)	95	95
Performance Guarantee	80% SOH after 3,650 cycles Or after 10 yrs	80% SOH after 3,650 cycles Or 70% SOH after 15 yrs
* Lower currents available		

PHYSICAL CHARACTERISTICS		
MODEL	**Block2.2**	**Block3.1**
Weight (lbs. / kg)	72,000 / 32,659	90,000 / 40,823
Dimensions (ft.)	40' L x 8' W x 6'6" H	40' L x 8' W x 6'6" H
Enclosure Type / Rating	HIGH CUBE / IP 54	HIGH CUBE / IP 54
Ambient Temperature Range	-30 TO +50 °C	-30 TO +50 °C
Number of Stacks (fully populated)	16	14
**Energy per Area (kWh / ft^2) ** **	7.00	9.84
Fire Suppression	StatX (aerosol)	StatX (aerosol)
Cooling	FORCED AIR & HVAC	FORCED AIR & HVAC
Codes & Standards Compliance	UL 1642, UL 1973, IEC 62619	UL 1642, UL 1973, IEC 62619
** Does not include setbacks, PCS or BOP		

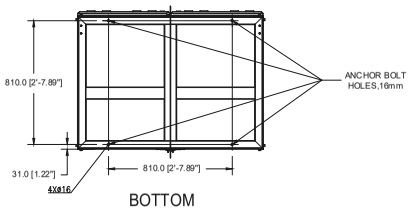
ABOUT POWIN ENERGY

Powin Energy is creating the next wave of safe and scalable battery energy storage that is purpose-built for the demands of utility-scale, commercial and industrial, and microgrid applications. With an unrivaled team of experts from across the energy industry, almost three decades of supply chain management expertise, extensive battery management software proficiency, a modular architecture, and a streamlined installation processes, Powin is making energy storage highly cost-effective and relatively pain free.

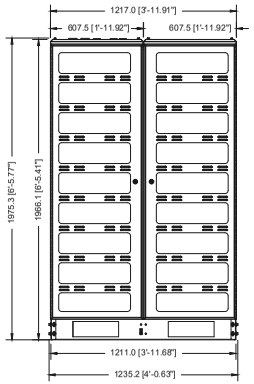
CONTACT US powinenergy.com sales@powinenergy.com

GENERAL NOTES

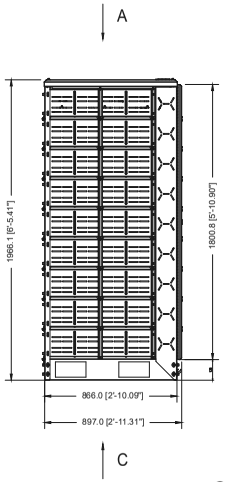
ALL UNITS - mm / [inch]



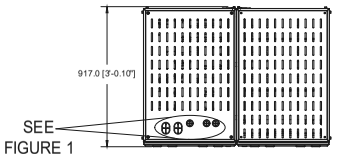
BOTTOM
VIEW C



FRONT
VIEW B

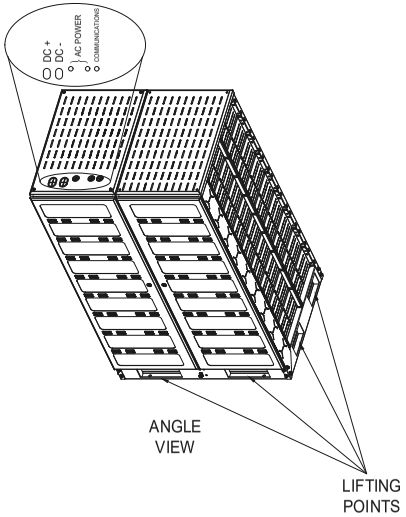


SIDE
VIEW D



TOP
VIEW A

FIGURE 1 - CABLE ENTRY



GENERAL NOTES

- STACK WEIGHT IS 1700 Kg.
- MOVING OF STACK NEEDS TO BE DONE USING A FORKLIFT OR HEAVY-DUTY PALLET JACK.
- SEE POWIN ENERGY 'STACK 140 INSTALLATION MANUAL' FOR HANDLING INSTRUCTIONS.

Powin Energy

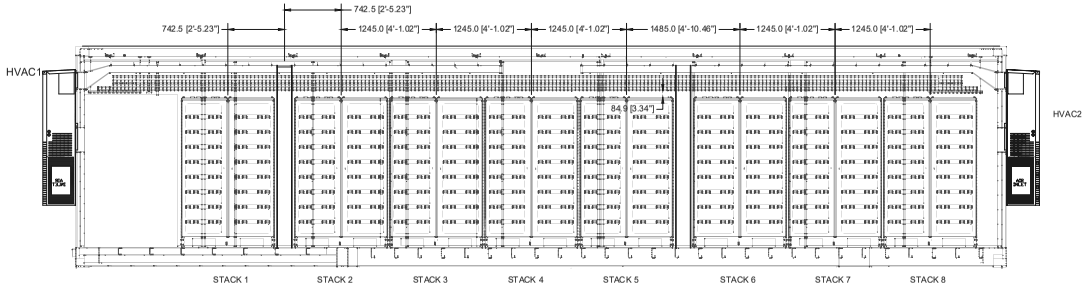
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DESIGNED BY:	DATE: 03/15/19
REVIEWED BY:	DRAWING NO.:
APPROVED BY:	PROJECT NO.:
	REVISION NO.: A

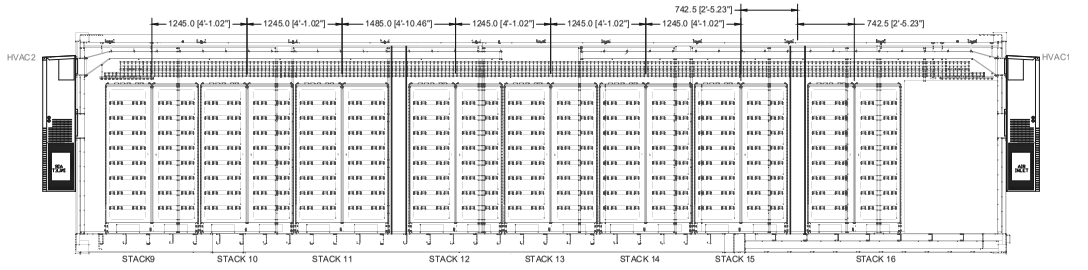
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POWIN BESS ENCLOSURE ELECTRICAL
POWIN STACK140 LAYOUT

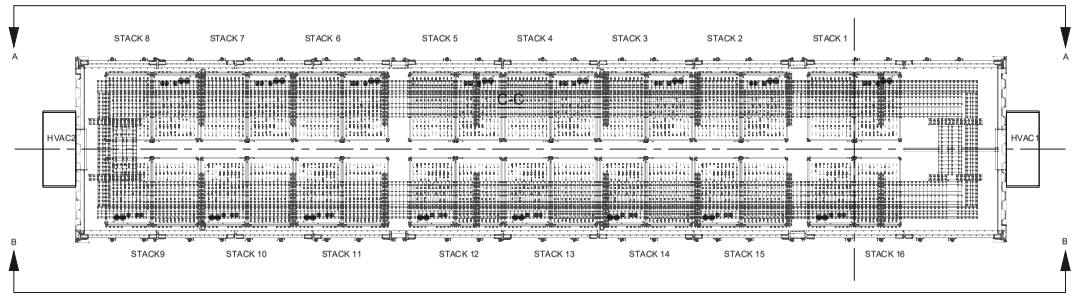
SHEET NO.
E.21



A-A FRONT VIEW WITH DOOR OPEN



B-B FRONT VIEW WITH DOOR OPEN



TOP VIEW INTERIOR

GENERAL NOTES

1. REFER TO DWG S2, S3, ENCLOSURE LAYOUT FOR SPECIFIC BATTERY STACK PLACEMENT IN THE INDIVIDUAL ENCLOSURES.
2. REFER TO DWG E25,E26,E26,E28, FOR DC COMBINER CABINET, AC PANELBOARD FIRE SUPPRESSION AND COMMUNICATION PANEL DETAILS.

NO.	DATE	REVISION	DR	BY	APVD

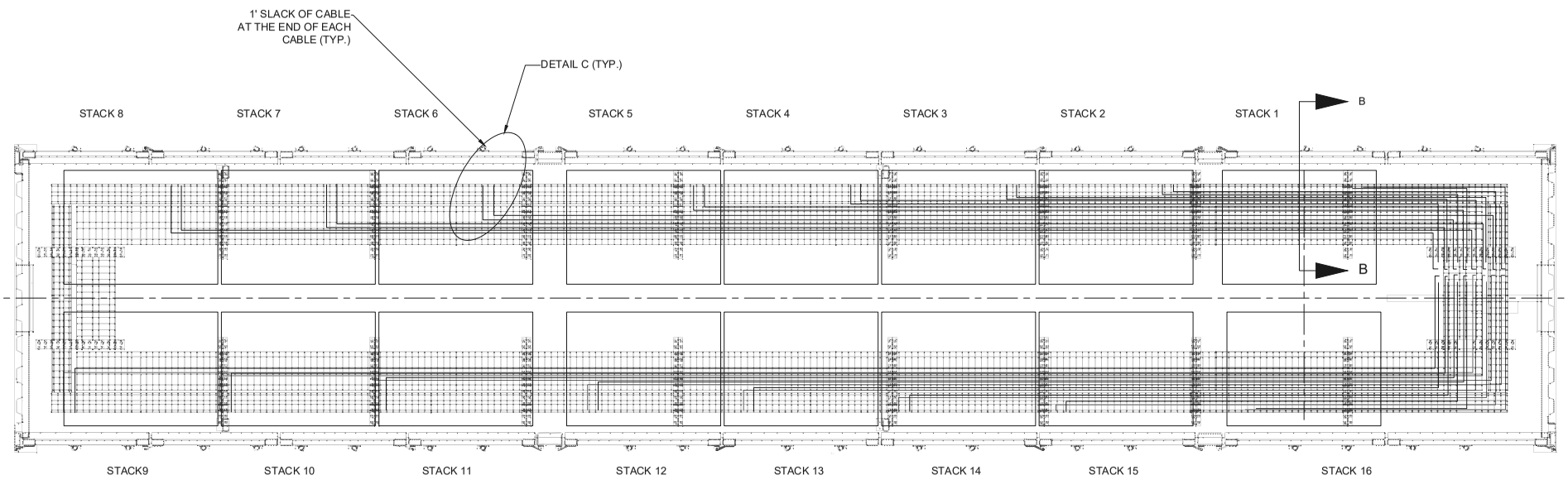
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APPROVED BY:	PROJECT NO.:
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NOT FOR CONSTRUCTION

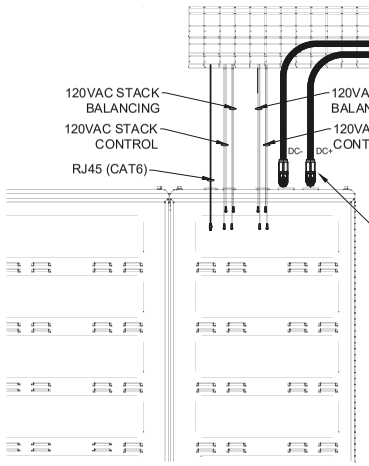
POWIN BESS ENCLOSURE ELECTRICAL
STACK PLACEMENT LAYOUT – IN ENCLOSURE

SHEET NO.
E22

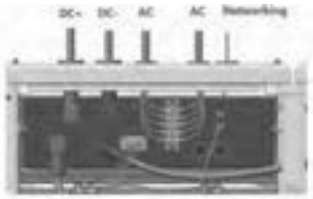
Powin Energy



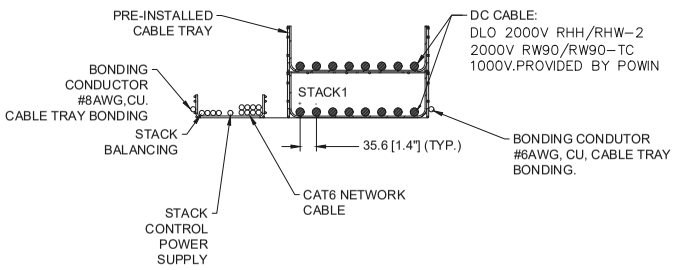
A-A TOP VIEW INTERIOR



NOTE:
1. PROVIDE 1' SLACK CABLE BELOW THE CABLE TRAY FOR ALL AC, DC AND COMM. CABLE.
2. TERMINATE THE DC CABLE USING THE PROVIDED AMPHANOL CONNECTORS FOLLOWING THE MANUFACTURE'S RECOMMENDED METHODOLOGY. AND LABEL ACCORDINGLY.
3. CRIMP THE END OF AC CABLE WITH RING LUG WITH M6 HOLE. AND LABEL
4. TERMINATE THE CAT6 CABLE WITH RJ45 CONNECTOR, AND LABEL



C / E004 CABLE TERMINATION
N.T.S.



B-B: CABLE TRAY CROSS SECTION VIEW

Powin Energy

NO.	DATE	REVISION	DR	BY	APVD

DESIGNED BY:	DATE: 03/15/19
REVIEWED BY:	DRAWING NO.:
APPROVED BY:	PROJECT NO.:
	REVISION NO.: A

NOT FOR CONSTRUCTION

POWIN BESS ENCLOSURE ELECTRICAL CABLE ARRANGEMENT

SHEET NO. E.23

BOND ALL SECTIONS OF THE DC CABLE TRAY WITH MINIMUM #6AWG COPPER.

BOND ALL SECTIONS OF THE AC & COMM CABLE TRAY WITH MINIMUM #8AWG COPPER.

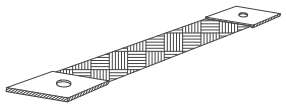
A,B
E24

B

C
E24

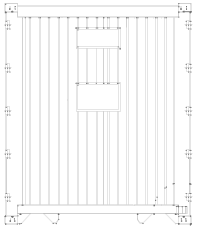
NOTE: BONDING CONNECTION TO ALL EQUIPMENT, INCLUDING DC DC COMBINER CABINET, HVACs, PANEL BOARDS, FIRE PROTECTION EQUIPMENT, AND ETC. IN THE CONTAINER PER THE REQUIREMENT OF THE LATEST OESC.

A,B
E24



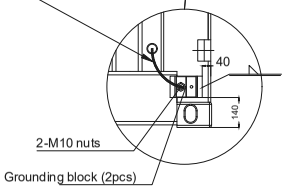
NOTE: BONDING OF ALL SWING DOORS, AND HINGES, WITH COPPER BRAID, 1 " WIDTH MINIMUM.

C E24 COPPER BRAID FOR DOOR BONDING
N.T.S.



NOTE: GROUNDING BLOCKS WELD TO THE TWO OPPOSITE BOTTOM CORNERS OF THE ENCLOSURE.

INTERIOR EQUIPMENT BONDING AND ENCLOSURE GROUNDING POINT TO BE CONNECTED WITH #4/0 COPPER WIRE

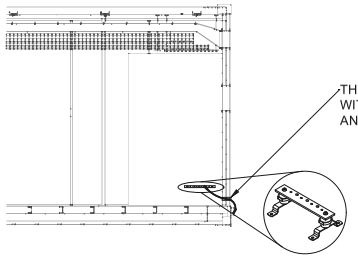


A E24 ENCLOSURE GROUNDING
N.T.S.

NOTE: COPPER GROUNDING BUSBAR FOR INTERIOR EQUIPMENT BONDING. 1"x18"X$\frac{1}{2}$" BOLTED TO METAL FLOOR.

THE EQUIPMENT BONDING BUSBAR TIED CONNECTED EXTERIOR ENCLOSURE GROUNDING (DETAIL A) WITH #4/0 CU CONDUCTOR.

THROUGH ENCLOSURE WALL WITH PROTECTIVE FITTINGS AND SEALED.



B E24 EQUIPMENT BONDING POINT AT TWO OPPOSITE CORNERS

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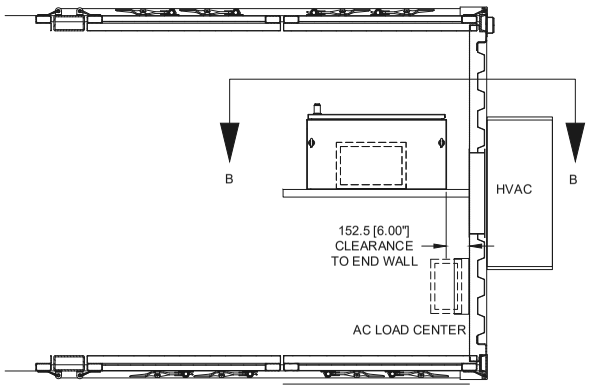
NO.	DATE	REVISION	DR	BY	APVD

DESIGNED BY:	DATE: 03/15/19
REVIEWED BY:	DRAWING NO.:
APPROVED BY:	PROJECT NO.:
	REVISION NO.: A

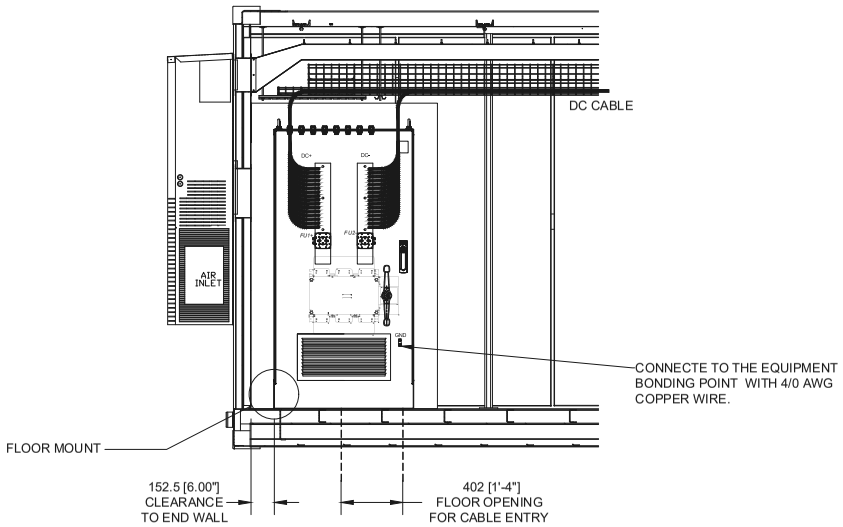
NOT FOR CONSTRUCTION

POWIN BESS ENCLOSURE ELECTRICAL BONDING AND GROUNDING

SHEET NO.
E.24



A-A TOP VIEW INTERIOR
TYPE 1 ENCLOSURE



B-B FRONT VIEW DC COMBINER CABINET
TYPE 1 ENCLOSURE

Powin Energy

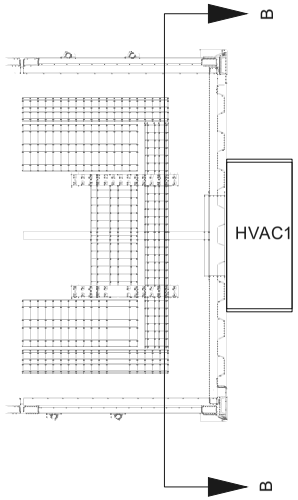
NO.	DATE	REVISION	DR	BY	APVD

DESIGNED BY:	DATE: 03/15/19
REVIEWED BY:	DRAWING NO.:
APPROVED BY:	PROJECT NO.:
	REVISION NO.: A

NOT FOR CONSTRUCTION

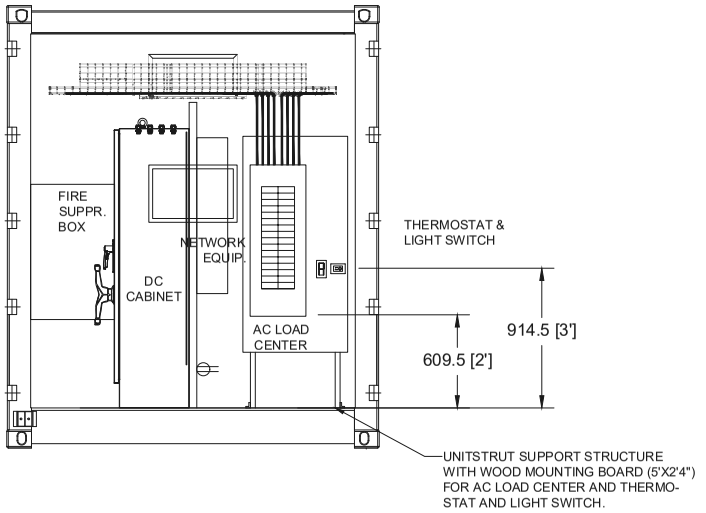
POWIN BESS ENCLOSURE ELECTRICAL
TYPE 1 ENCLOSURE
1500A DC COMBINER CABINET DETAILS

SHEET NO.
E.25



A-A TOP VIEW INTERIOR

END WALL



B-B FRONT VIEW INTERIOR

END WALL DETAILS

Powin Energy

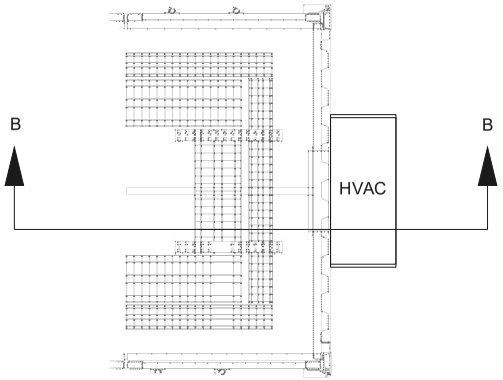
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DESIGNED BY:	DATE: 03/15/19
REVIEWED BY:	DRAWING NO.:
APPROVED BY:	PROJECT NO.: C
	REVISION NO.: A

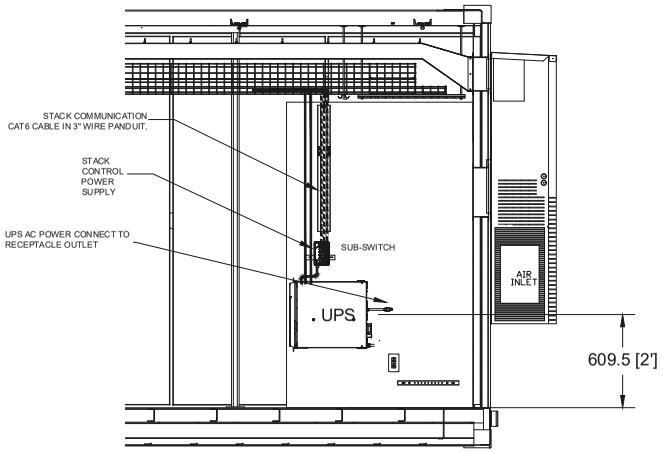
NOT FOR CONSTRUCTION

POWIN BESS ENCLOSURE ELECTRICAL
END WALL DETAIL

SHEET NO.
E.27

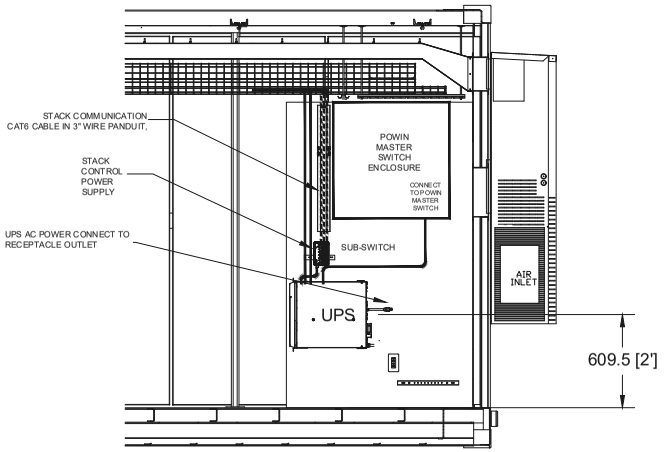


A-A TOP VIEW INTERIOR



B.1-B.1 FRONT VIEW - SLAVE

COMMUNICATION WALL DETAILS
ENCLOSURE A,B,D,E



B.2-B.2 FRONT VIEW - MASTER (ENCLOSURE C)

COMMUNICATION WALL DETAILS

Powin Energy

NO.	DATE	REVISION	DR	BY	APVD

DESIGNED BY:	DATE: 03/15/19
REVIEWED BY:	DRAWING NO.:
APPROVED BY:	PROJECT NO.:
	REVISION NO.: A

NOT FOR CONSTRUCTION

POWIN BESS ENCLOSURE ELECTRICAL
COMMUNICATION WALL DETAILS

SHEET NO.
E.28

GENERAL NOTES:

1. IMPORTANT THIS DESIGN IS NOT SITE SPECIFIC AND IS ONLY INTENDED TO PROVIDE GUIDANCE FOR A FOUNDATION DESIGN FOR THE PROPOSED SHIPPING CONTAINERS. A LICENSED ENGINEER AND/OR GEOTECHNICAL ENGINEER SHALL PROVIDE SITE SPECIFIC DESIGN.
2. THE CONTRACTOR SHALL VERIFY ALL DIMENSIONS, ELEVATIONS AND SITE CONDITIONS BEFORE STARTING WORK AND SHALL NOTIFY AOstructures, INC - STRUCTURAL ENGINEERS, (AOstructures, INC) OF ANY DISCREPANCIES.
3. ALL OMISSIONS AND CONFLICTS BETWEEN THE VARIOUS ELEMENTS OF THE WORKING DRAWINGS AND/ OR SPECIFICATIONS SHALL BE BROUGHT TO THE ATTENTION OF POWERIN BEFORE PROCEEDING WITH WORK SO INVOLVED.
3. RESOLVE ANY CONFLICTS ON THE DRAWINGS WITH POWERIN BEFORE PROCEEDING WITH CONSTRUCTION.
4. ALL MATERIAL AND WORK SHALL CONFORM TO THE REQUIREMENTS OF THE 2015 IBC.
5. NEITHER THE OWNER NOR POWERIN WILL ENFORCE SAFETY MEASURES OR REGULATIONS. THE CONTRACTOR SHALL DESIGN, CONSTRUCT, AND MAINTAIN ALL SAFETY DEVICES INCLUDING SHORING AND BRACING, AND SHALL BE SOLELY RESPONSIBLE FOR CONFORMING TO ALL LOCAL, STATE AND FEDERAL SAFETY AND HEALTH STANDARDS, LAWS AND REGULATIONS. THE CONTRACT DRAWINGS AND SPECIFICATIONS REPRESENT THE FINISHED STRUCTURE AND DO NOT INDICATE METHODS, PROCEDURES OR SEQUENCE OF CONSTRUCTION. THE CONTRACTOR SHALL TAKE NECESSARY PRECAUTIONS TO MAINTAIN AND INSURE THE INTEGRITY OF THE STRUCTURE DURING CONSTRUCTION. IF A LAWSUIT IS FILED BY ONE OF THE CONTRACTOR'S OR SUBCONTRACTOR'S EMPLOYEES, OR ANY ONE ELSE, THE CONTRACTOR WILL INDEMNIFY, DEFEND AND HOLD THE OWNER AND POWERIN HARMLESS OF ANY AND ALL SUCH CLAIMS.
6. IT SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR TO ASSURE THAT ALL STRUCTURAL ELEMENTS AND MEMBERS (I.E. ROOF, SLAB, COLUMNS ETC.) ARE ADEQUATELY BRACED DURING CONSTRUCTION. BRACING OF SUCH ELEMENTS AND MEMBERS SHALL REMAIN IN PLACE UNTIL THEY ARE PROPERLY SECURED.
7. CONSTRUCTION MATERIAL SHALL BE EVENLY DISTRIBUTED IF PLACED ON FRAMED FLOORS OR ROOFS. LOADS SHALL NOT EXCEED THE ALLOWABLE LOADING FOR THE SUPPORTING MEMBERS AND THEIR CONNECTIONS.
8. SPECIFIC DETAILS OR NOTES ON OTHER SHEETS SHALL PREVAIL OVER STANDARD NOTES ON THIS SHEET. WHERE CONSTRUCTION DETAILS ARE NOT SHOWN OR NOTED FOR ANY PART OF THE WORK, SUCH DETAILS SHALL BE THE SAME AS FOR SIMILAR WORK SHOWN ON THE DRAWINGS.
9. THE CONTRACTOR SHALL DETERMINE THE LOCATION OF THE UTILITY SERVICE IN THE AREA TO BE EXCAVATED PRIOR TO BEGINNING EXCAVATION.
10. NO PIPES, DUCTS, SLEEVES, CHASE ETC., SHALL BE PLACED IN SLABS, BEAMS, COLUMNS, WALLS, ETC., UNLESS SPECIFICALLY SHOWN OR NOTED. NOR SHALL ANY STRUCTURAL MEMBER BE CUT FOR PIPES, DUCTS, ETC., UNLESS SPECIFICALLY SHOWN. OBTAIN PRIOR WRITTEN APPROVAL FOR INSTALLATION OF ANY ADDITIONAL PIPES, DUCTS, ETC.

REINFORCED CONCRETE NOTES:

1. CEMENT SHALL CONFORM TO ASTM C-150, TYPE II.
2. AGGREGATES SHALL CONFORM TO ASTM C-33 FOR NORMAL WEIGHT CONCRETE AND ASTM C-330 FOR LIGHT WEIGHT CONCRETE.
3. ANCHOR BOLTS SHALL CONFORM TO ASTM ASTM F1554 GRADE 36.
4. ALL REINFORCING STEEL, ANCHOR BOLTS, DOWELS AND OTHER INSERTS SHALL BE SECURED IN POSITION AND INSPECTED BY THE LOCAL BUILDING DEPARTMENT INSPECTOR PRIOR TO THE POURING OF ANY CONCRETE.
5. FINISHED SURFACES OF FLOOR SLABS SHALL NOT DEVIATE MORE THAN 1/8" FROM THE LOWER EDGE OF A 10 FOOT STRAIGHT EDGE.
6. CONCRETE SHALL MEET THE FOLLOWING DESIGN CRITERIA:

LOCATION	MIN 28 DAY COMP STRENGTH	MIN CEMENT	MAX AGGREGATE	MAX SLUMP
FOUNDATION	2500 psi	5.5 SACKS/ YD	1"	4"
NONSTRUCTURAL SLAB ON GRADE	2500 psi	5.0 SACKS/ YD SLAB ON GRADE	1"	4"

7. CONCRETE MIX TESTING AND DESIGN SHALL MEET THE REQUIREMENTS OF CHAPTER 3 OF ACI 318-11 AND SECTION 1904 OF THE 2013 CBC RESPECTIVELY, AND THESE SPECIFICATIONS.
8. ADMIXTURES SHALL BE REVIEWED BY AOstructure, INC. CALCIUM CHLORIDE OR ADDED CHLORIDES ARE NOT PERMITTED.
9. DRY PACK SHALL BE 1 PART CEMENT AND 2 PARTS SAND BY VOLUME.
10. PROVIDE A 3/4 INCH CHAMFER ON EXPOSED CORNERS.
11. CONSTRUCTION JOINTS SHALL BE ROUGHENED TO 1/4" AMPLITUDE MINIMUM OR KEYED JOINTS PER PLAN. WAIT 48 HOURS BETWEEN POURS.
12. THE LOCATION OF ALL SLAB ON GRADE CONSTRUCTION, CONTROL, AND WEAKENED PLANE JOINTS NOT SPECIFICALLY INDICATED ON THE DRAWINGS SHALL BE REVIEWED AND APPROVED BY AOstructure, INC PRIOR TO THE PLACING OF REINFORCEMENT.
13. CONCRETE CURING SHALL BE PER THE PROVISIONS OF THE BUILDING CODE REQUIREMENTS FOR REINFORCED CONCRETE OF THE AMERICAN CONCRETE INSTITUTE.
14. ALL CONCRETE SHALL BE CONSOLIDATED WITH MECHANICAL VIBRATORS.

REINFORCING STEEL NOTES:

1. BAR REINFORCING SHALL CONFORM TO ASTM A615, GRADE 40.
2. REINFORCING DETAILING, FABRICATION AND PLACING SHALL CONFORM TO THE PROVISIONS OF THE BUILDING CODE REQUIREMENTS FOR REINFORCED CONCRETE OF THE AMERICAN CONCRETE INSTITUTE.
3. ALL REINFORCING STEEL, ANCHOR BOLTS, HOLD DOWN ANCHORS, DOWELS AND INSERTS SHALL BE WELL SECURED IN POSITION PRIOR TO PLACING CONCRETE OR GROUT.
4. REINFORCING STEEL SHALL BE PROVIDED WITH THE FOLLOWING AMOUNTS OF CONCRETE COVER UNLESS OTHERWISE NOTED:
   CONCRETE CAST AGAINST EARTH.....3"
   FORMED CONCRETE EXPOSED TO EARTH OR WEATHER:
   NO. 5 OR SMALL BARS.....1-1/2"
5. SPLICES:
   SPLICES IN NO. 8 OR SMALLER BARS SHALL BE 45 DIAMETERS. SPLICES IN ADJACENT BARS SHALL BE STAGGERED 5'-0".

DESIGN CRITERIA:

40'-0" LONG CONTAINER DESIGN WEIGHT:	72.8k
53'-6" LONG CONTAINER DESIGN WEIGHT:	115k
ROOF LIVE LOAD:	20 PSF
ASSUMED SOIL BRG:	1,500 PSF
ASSUMED SKIN FRICTION:	150 PSF
ASSUMED LATERAL PASSIVE PRES:	150 PSF/FT
MAX DESIGN SDS:	1.0g

SCOPE OF WORK:

PROVIDE DESIGN GUIDANCE FOR FOUNDATION SYSTEM TO SUPPORT PRE-MANUFACTURED SHIPPING CONTAINERS.

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REVISIONS

STAMP

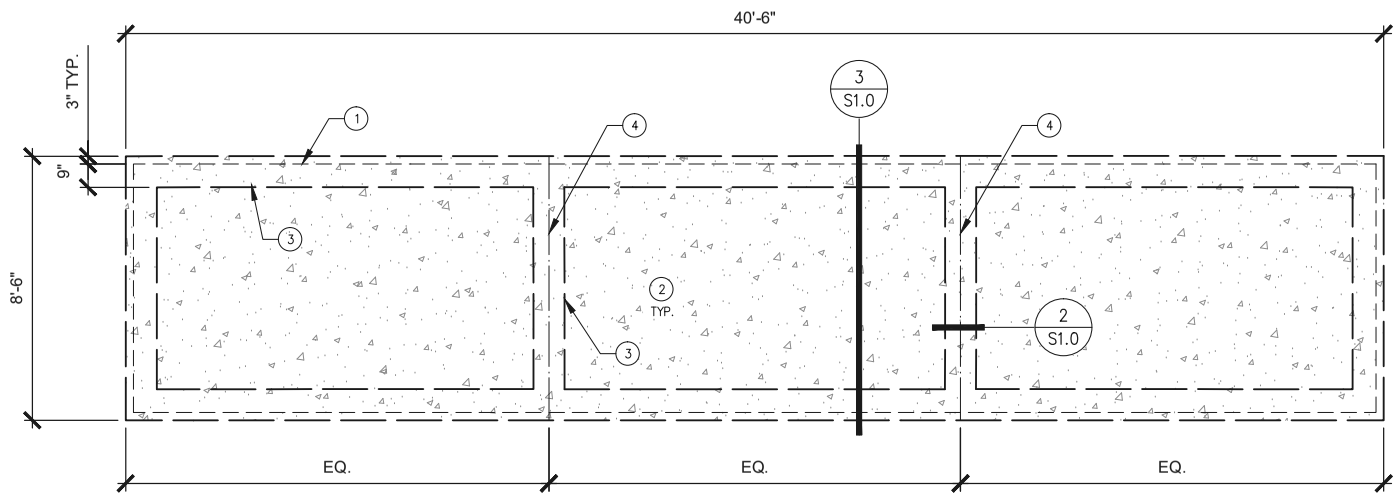
DATE: 12/14/18

PROJECT:

FOUNDATION DESIGN
SHIPPING CONTAINER
SUPPORT SYSTEM

SHEET TITLE:
GENERAL NOTES

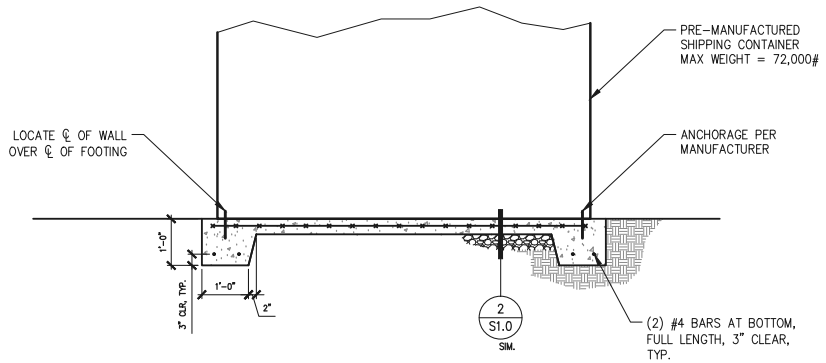
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S0



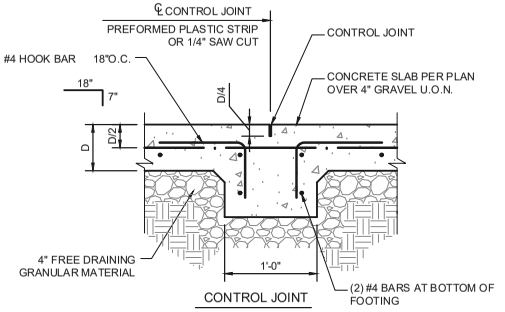
FOUNDATION NOTES:

1. OUTLINE OF SHIPPING CONTAINER STRUCTURE ABOVE, BY OTHERS.
2. 6" THICK CONCRETE SLAB w/ #4 BARS AT 18"O.C. BOTH WAY.
3. EDGE OF THICKENED SLAB EDGE, 12" FROM PERIMETER.
4. CONTROL JOINT, SEE DETAIL 2/S1.0

1 8'-0" x 40'-0" CONTAINER FOUNDATION PLAN
SCALE: 1/4" 1'-0"



3 FOOTING SECTION
SCALE: 3/8" 1'-0"



NOTES:
1. CONTROL JOINTS SHALL BE PROVIDED IN A CHECKERBOARD PATTERN AT NO MORE THAN 12'-0" ON CENTER EACH WAY, U.O.N

2 CONTROL JOINT
SCALE: NTS

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REVISIONS

STAMP

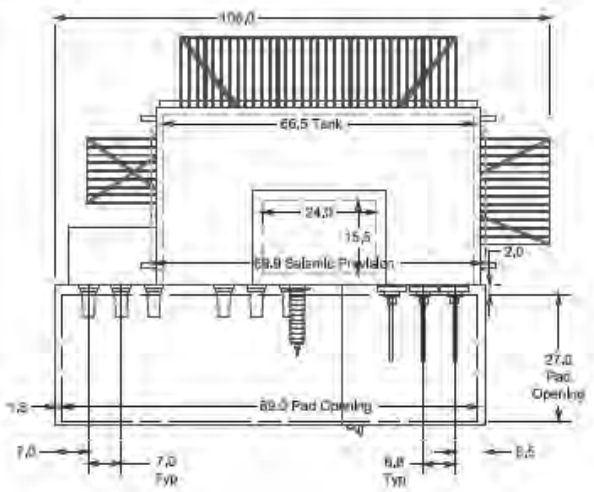
DATE: 12/14/18

PROJECT:
FOUNDATION DESIGN
SHIPPING CONTAINER
SUPPORT SYSTEM

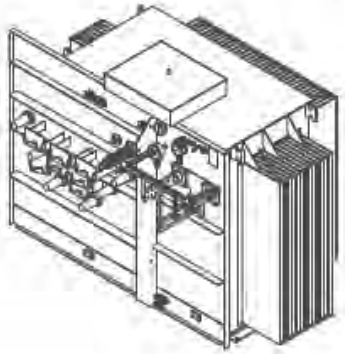
SHEET TITLE:
8' x 40'
SLAB PLAN

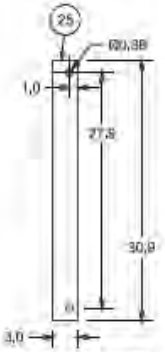
SHEET NUMBER:
S1.0

ITE	DESCRIPTION
1	Welded Cover w/ Handhole
2	Cooling Corrugate
3	Cooper Bayonet Fusing w/ Drilponiate
4	Current Limiting Backup Fuses (Internal)
5	Drain Valve with Sampler
6	Ground Pad ,50-13 Tap
7	Ground Pad ,50-13 Tap
8	H0 Bushing
9	High Security Cabinet w/ Pentahead Door Bolts
10	35kV 200 Amp Loadbreak HV Bushing
11	LV Bushing Support
12	Lifting Lug
13	Liquid Temperature Gauge w/ Alarm Contacts
14	1.2kV LV Bushing w/10 Hole Spade Supported
15	Magnetic Oil Level Gauge w/ Alarm Contacts
16	Nameplate
17	One Inch Upper Press. Drain, and Fill Plug
18	Four Position T-Blade Loadbreak Switch
19	Parking Stand
20	Pressure Relief Device w/ Alarm Contacts
21	Pressure Relief Valve
22	Pressure Switch w/ Alarm Contacts
23	Pressure Vacuum Gauge
24	Schrader Valve
25	Seismic Anchor Provisions
26	Tank Base w/ Jacking and Rolling Facilities
27	5-Position Tap Changer
28	Vacuum Switch w/ Alarm Contacts
29	27.0kV (22.0kV MCOV) Arrester (Internal)

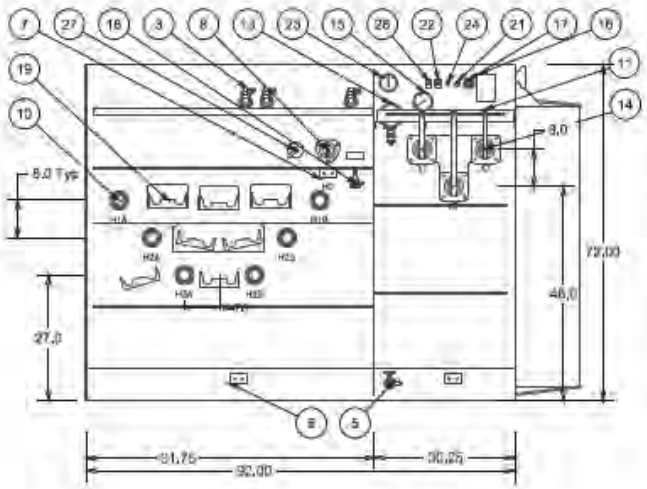


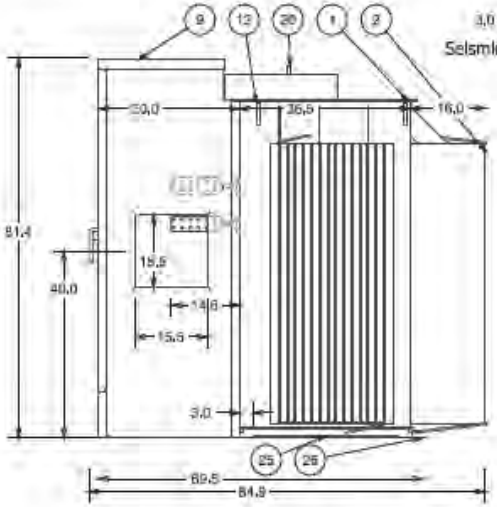
Cabinet Removed





Seismic Provision Detail





3PH Padmount Transformer 60Hz
2237.0 kVA ONAN 65 AWR Mineral Oil
HV 34500Y/19920 150 kV BIL
LV 4800 30 kV BIL
5.75 %IZ

ANSI 70 Gray Topcoat
Mild Steel Construction

Customer: DYNAPOWER CORPORATION
Project: DYNAPOWER

MATERIAL:

ALL DIMENSIONS ARE IN INCHES [MM]

THE INFORMATION ON THIS DOCUMENT WAS CREATED BY EATON. IT WAS DISCLOSED IN CONFIDENCE AND IS ONLY TO BE USED FOR THE PURPOSE IN WHICH IT WAS SUPPLIED.

THIS DRAWING HAS BEEN GENERATED FROM A 3D MODEL.

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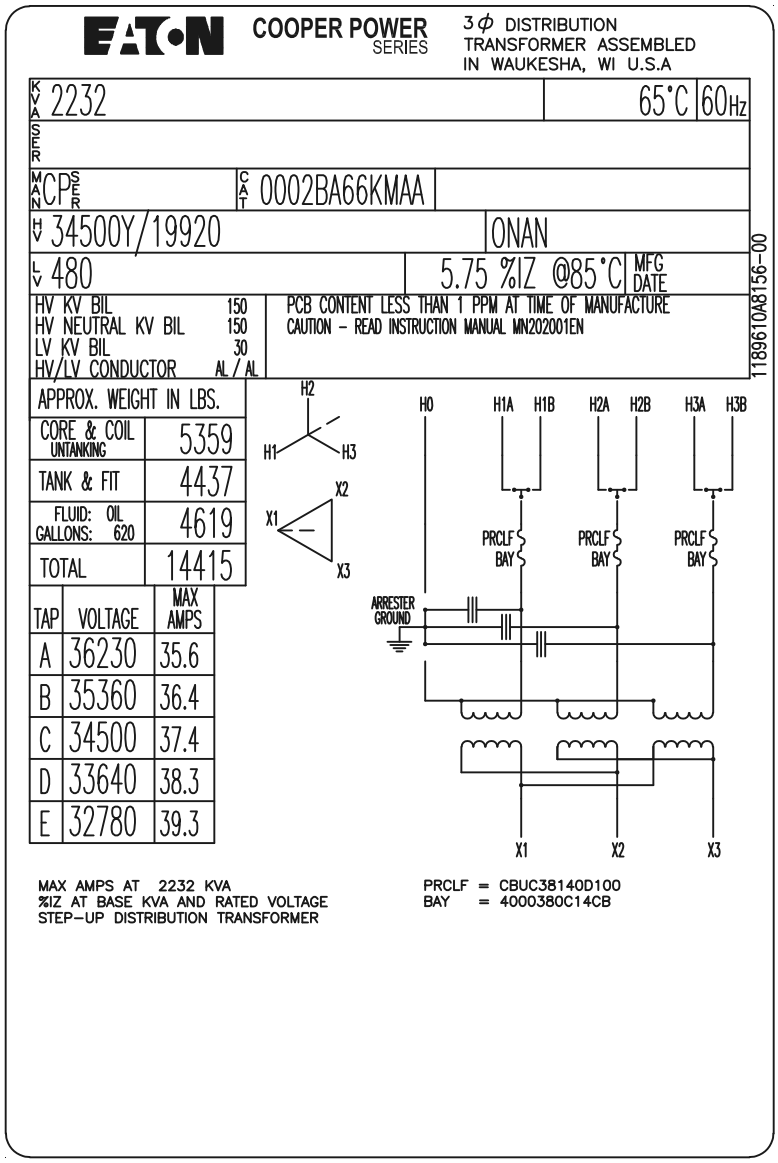
title: Distribution Transformer Outline Drawing

desc: **COOPER POWER SERIES** THREE-PHASE PAD-MOUNTED COMPARTMENTAL TYPE

DWG:	DATE:	REF:	SHEET #	SCALE:	REV:
PTP	3/19/2018	P3D V09R09M00	1 OF 1		00

0002BA66KMAA

0002BA66KMAA
REVISIONS



NOTES: **1) ACTUAL PLATE IS A NEGATIVE OF THE ABOVE DRAWING.**
2) ACTUAL %IZ TO BE STAMPED IN AFTER TESTING.

NAMEPLATE MATERIAL: ALUMINUM

213223568,60

1189610A8156
REVISIONS

MATERIAL:

ALL DIMENSIONS ARE IN INCHES [MM]

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Powering Business Worldwide

TITLE: LASER NAMEPLATE
DESC: **COOPER POWER SERIES** 0002BA66KMAA

DWG:	DATE:	REF:	SHEET #:	SCALE:	REV:
PTP	3/19/2018		1 of 1	1=1	00

1189610A8156

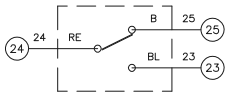
VS - 1 *



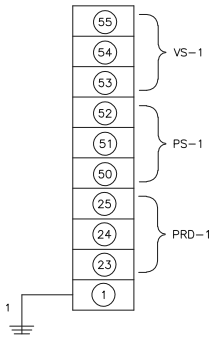
PS - 1 *



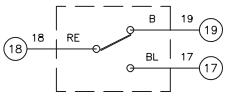
PRD - 1



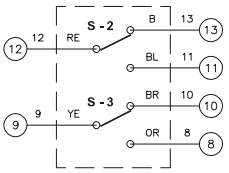
TB - 2



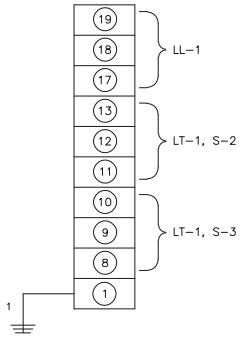
LL - 1



LT - 1



TB - 1



GAGE SWITCH SETTINGS						
DEVICE	LT 55°C AWR	LT 65°C, 55/65 AWR	LT 75°C, 55/75, 65/75 AWR	WTI 55°C AWR	WTI 65°C, 55/65 AWR	WTI 75°C, 55/75, 65/75 AWR
S-1 (FANS)	60°C	70°C	80°C	70°C	80°C	90°C
S-2 (ALARM)	80°C	90°C	100°C	110°C	120°C	130°C
S-3 (TRIP)	105°C FIXED	105°C FIXED	120°C FIXED	120°C FIXED	130°C FIXED	140°C FIXED

PS-1 PRESSURE SWITCH, GEMS PS-E (63PV)
ACTIVATES AT +6.0±0.5 PSIG (+41±3 kPa) RISING
VS-1 VACUUM SWITCH, GEMS PS-EV (63PV)
ACTIVATES AT -2.5±0.5 PSIG (-17±3 kPa) FALLING
PRD-1 PRESSURE RELIEF DEVICE (63PR)
ACTIVATES AT 10±1 PSIG (69±7 kPa) RISING
LL-1 LIQUID LEVEL GAGE (71Q)
S-1 ACTIVATES LOW LEVEL ALARM CIRCUIT
LT-1 LIQUID TEMPERATURE GAGE (26Q)
TB-(1-2) TERMINAL BLOCK, 600V, 35A

- USE COOPER CONDUCTORS ONLY, #22 - 10 AWG
- TB-(1-2) SCREW TIGHTENING TORQUE 18-20.0 IN-LB

WH - WHITE
GR - GREEN
BL - BLACK
B - BLUE
OR - ORANGE
RE - RED
BR - BROWN
YE - YELLOW

GAGE SWITCH RATINGS (AMPS)				
DEVICE	120/240VAC	48VDC	125VDC	250VDC
LT/LL/ PRD/RRR	15	1.3	.50	.25
SPC	10	2.0	.50	.25
PS/VS	5	1.0	.40	.20
WTI	15	1.3	.50	.25
TPG	1	--	–	–
LCP	3	--	–	–
U	5	2.0	2.0	N/A

NOTE: AC LOADS = INDUCTIVE P.F. 75%
DC LOADS = NON-INDUCTIVE

LEGEND

- INDICATES PREWIRED DEVICE
- INDICATES REMOTE DEVICE
- 26 — INDICATES WIRE HEAT SHRINK NUMBER LABEL
- (26) OR [26] — INDICATES TERMINAL BLOCK CONNECTION
- 26 — INDICATES INTRINSICALLY SAFE TERM BLOCK CONN
- 12 — INDICATES RELAY TERM AND #
- INDICATES SPLICE
- INDICATES NORMALLY CLOSED CONTACT (NC)
- INDICATES NORMALLY OPEN CONTACT (NO)
- INDICATES CUSTOMER CONNECTION
- POLARITY MARK
- ^ INDICATES CT SHORTING PINS - TO BE REMOVED WHEN LOAD IS CONNECTED TO CT
- * WIRE COLORS APPLICABLE ONLY WHEN USING CORD CONNECTORS TO SWITCHES

MATERIAL:

ALL DIMENSIONS ARE IN INCHES [MM]

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Powering Business Worldwide

TITLE: SCHEMATIC LT,LL,PRD,PV
DESC: **COOPER POWER SERIES** 3PH PAD

DWG:	DATE:	APP:	SHEET #:	SCALE:	REV:
PTP	04/13/15		1 of 1	1=1	00

SC-2200-10 / SC-2475-10 / SC-2500-EV-10 / SC-2750-EV-10 / SC-3000-EV-10



Efficient

- Up to 4 inverters can be transported in one standard shipping container
- Overdimensioning up to 225% is possible
- Full power at ambient temperatures of up to 35 °C

Robust

- Intelligent air cooling system OptiCool for efficient cooling
- Suitable for outdoor use in all climatic ambient conditions worldwide

Flexible

- Conforms to all known grid requirements worldwide
- Q on demand
- Available as a single device or turnkey solution, including medium-voltage block

Easy to Use

- Improved DC connection area
- Connection area for customer equipment
- Integrated voltage support for internal and external loads

SUNNY CENTRAL 2200 / 2475 / 2500-EV / 2750-EV / 3000-EV

The new Sunny Central: more power per cubic meter

With an output of up to 3000 kVA and system voltages of 1100 V DC or 1500 V DC, the SMA central inverter allows for more efficient system design and a reduction in specific costs for PV power plants. A separate voltage supply and additional space are available for the installation of customer equipment. True 1500 V technology and the intelligent cooling system OptiCool ensure smooth operation even in extreme ambient temperature as well as a long service life of 25 years.

SUNNY CENTRAL 1000 V

Technical Data	Sunny Central 2200	Sunny Central 2475*
Input (DC)		
MPP voltage range V_{DC} (at 25 °C / at 35 °C / at 50 °C)	570 to 950 V / 800 V / 800 V	638 V to 950 V / 800 V / 800 V
Min. input voltage $V_{DC, min}$ / Start voltage $V_{DC, Start}$	545 V / 645 V	614 V / 714 V
Max. input voltage $V_{DC, max}$	1100 V	1100 V
Max. input current $I_{DC, max}$ (at 35°C / at 50°C)	3960 A / 3600 A	3960 A / 3600 A
Max. short-circuit current $I_{DC, sc}$	6400 A	6400 A
Number of DC inputs	24 double pole fused (32 single pole fused)	
Max. number of DC cables per DC input (for each polarity)	2 x 800 kcmil, 2 x 400 mm²	
Integrated zone monitoring	○	
Available DC fuse sizes (per input)	200 A, 250 A, 315 A, 350 A, 400 A, 450 A, 500 A	
Output (AC)		
Nominal AC power at cos φ =1 (at 35°C / at 50°C)	2200 kVA / 2000 kVA	2475 kVA / 2250 kVA
Nominal AC power at cos φ =0.8 (at 35°C / at 50°C)	1760 kW / 1600 kW	1980 kW / 1800 kW
Nominal AC current $I_{AC, nom}$ = Max. output current $I_{AC, max}$	3300 A	3300 A
Max. total harmonic distortion	< 3% at nominal power	< 3% at nominal power
Nominal AC voltage / nominal AC voltage range[1] [8]	385 V / 308 V to 462 V	434 V / 347 V to 521 V
AC power frequency / range	50 Hz / 47 Hz to 53 Hz 60 Hz / 57 Hz to 63 Hz	
Min. short-circuit ratio at the AC terminals[9]	> 2	
Power factor at rated power / displacement power factor adjustable[8] [10]	● 1 / 0.8 overexcited to 0.8 underexcited ○ 1 / 0.0 overexcited to 0.0 underexcited	
Efficiency		
Max. efficiency[2] / European efficiency[2] / CEC efficiency[3]	98.6% / 98.4% / 98.0%	98.6% / 98.4% / 98.0%
Protective Devices		
Input-side disconnection point	DC load break switch	
Output-side disconnection point	AC circuit breaker	
DC overvoltage protection	Surge arrester, type I	
AC overvoltage protection (optional)	Surge arrester, class I	
Lightning protection (according to IEC 62305-1)	Lightning Protection Level III	
Ground-fault monitoring / remote ground-fault monitoring	○ / ○	
Insulation monitoring	○	
Degree of protection: electronics / air duct / connection area (as per IEC 60529)	IP65 / IP34 / IP34	
General Data		
Dimensions (W / H / D)	2780 / 2318 / 1588 mm (109.4 / 91.3 / 62.5 inch)	
Weight	< 3400 kg / < 7496 lb	
Self-consumption (max.[4] / partial load[5] / average[6])	< 8100 W / < 1800 W / < 2000 W	
Self-consumption (standby)	< 300 W	
Internal auxiliary power supply	Integrated 8.4 kVA transformer	
Operating temperature range[8]	–25°C to 60°C / –13°F to 140°F	
Noise emission[7]	67.0 dB(A)	
Temperature range (standby)	–40°C to 60°C / –40°F to 140°F	
Temperature range (storage)	–40°C to 70°C / –40°F to 158°F	
Max. permissible value for relative humidity (condensing / non-condensing)	95% to 100% (2 month/year) / 0% to 95%	
Maximum operating altitude above MSL[8] 1000 m / 2000 m / 3000 m / 4000 m	● / ○ / ○ / ○ (earlier temperature-dependent derating)	
Fresh air consumption	6500 m³/h	
Features		
DC connection	Terminal lug on each input (without fuse)	
AC connection	With busbar system (three busbars, one per line conductor)	
Communication	Ethernet, Modbus Master, Modbus Slave	
Communication with SMA string monitor (transmission medium)	Modbus TCP / Ethernet (FO MM, Cat-5)	
Enclosure / roof color	RAL 9016 / RAL 7004	
Supply transformer for external loads	○ (2.5 kVA)	
Standards and directives complied with	CE, IEC / EN 62109-1, IEC / EN 62109-2, BDEW-MSRL, IEEE1547, UL 840 Cat. IV, Arrêté du 23/04/08	
EMC standards	IEC / EN 61000-6-4, IEC / EN 61000-6-2, EN 55022, IEC 62920, FCC Part 15 Class A, Cispr 11, DIN EN55011:2017	
Quality standards and directives complied with	VDI/VDE 2862 page 2, DIN EN ISO 9001	
● Standard features ○ Optional * preliminary		
Type designation	SC-2200-10	SC-2475-10

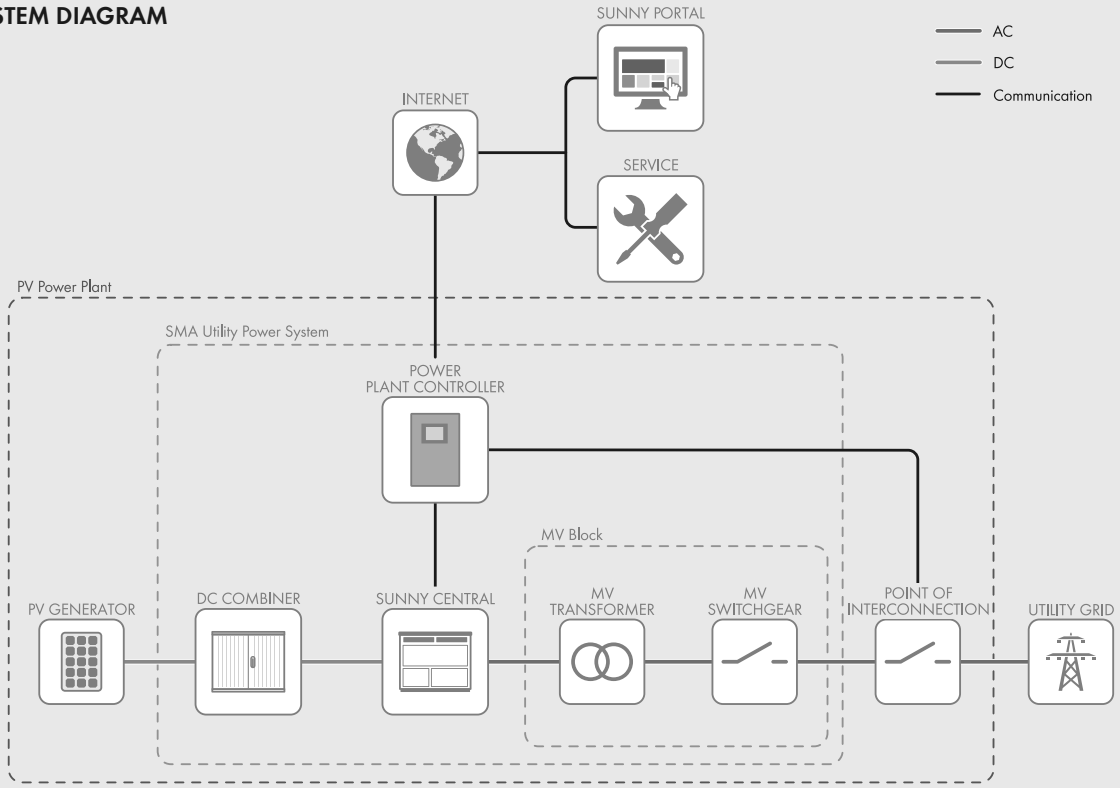
1) At nominal AC voltage, nominal AC power decreases in the same proportion
2) Efficiency measured without internal power supply
3) Efficiency measured with internal power supply
4) Self-consumption at rated operation
5) Self-consumption at < 75% Pn at 25°C
6) Self-consumption averaged out from 5% to 100% Pn at 25°C
7) Sound pressure level at a distance of 10 m
8) Values apply only to inverters. Permissible values for SMA MV solutions from SMA can be found in the corresponding data sheets.
9) A short-circuit ratio of < 2 requires a special approval from SMA
10) Depending on the DC voltage

SUNNY CENTRAL 1500 V

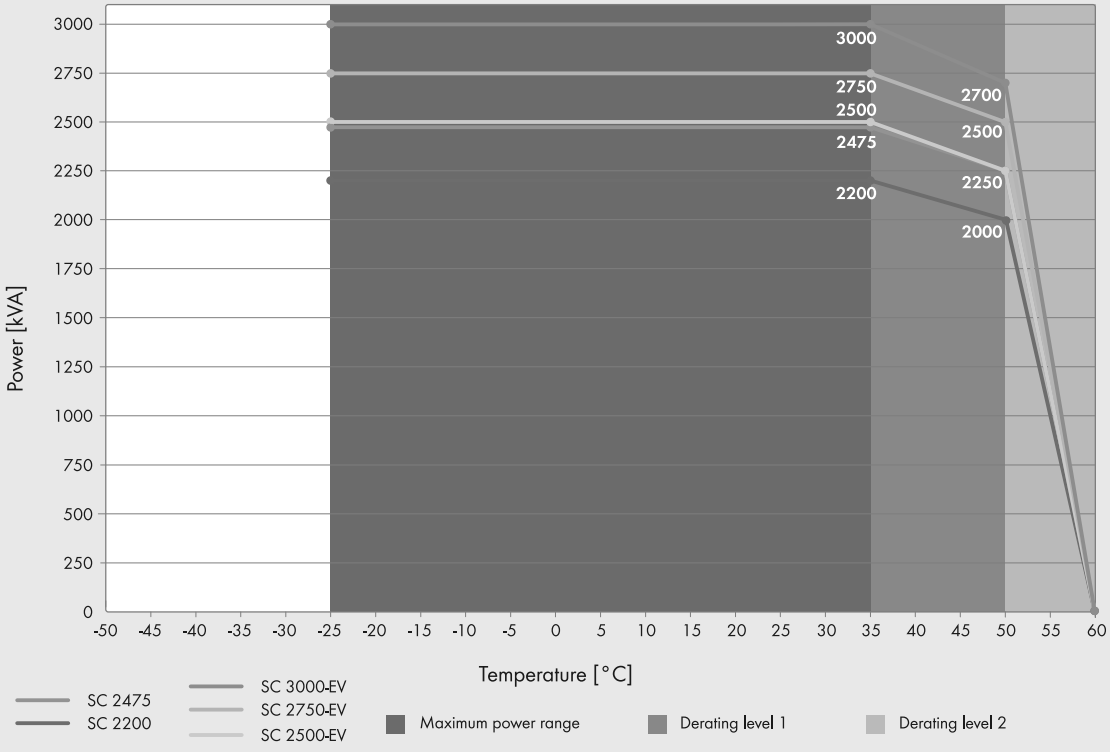
Technical Data	Sunny Central 2500-EV	Sunny Central 2750-EV	Sunny Central 3000-EV
Input (DC)			
MPP voltage range V_{DC} (at 25°C / at 35°C / at 50°C)	850 V to 1425 V / 1200 V / 1200 V	875 V to 1425 V / 1200 V / 1200 V	956 V to 1425 V / 1200 V / 1200 V
Min. input voltage $V_{DC, min}$ / Start voltage $V_{DC, Start}$	778 V / 928 V	849 V / 999 V	927 V / 1077 V
Max. input voltage $V_{DC, max}$	1500 V	1500 V	1500 V
Max. input current $I_{DC, max}$ (at 35°C / at 50°C)	3200 A / 2956 A	3200 A / 2956 A	3200 A / 2970 A
Max. short-circuit current rating	6400 A	6400 A	6400 A
Number of DC inputs	24 double pole fused (32 single pole fused) for PV		
Number of DC inputs with optional DC battery coupling	18 double pole fused (36 single pole fused) for PV and 6 double pole fused for batteries		
Max. number of DC cables per DC input (for each polarity)	2 x 800 kcmil, 2 x 400 mm²		
Integrated zone monitoring	○		
Available DC fuse sizes (per input)	200 A, 250 A, 315 A, 350 A, 400 A, 450 A, 500 A		
Output (AC)			
Nominal AC power at cos φ =1 (at 35°C / at 50°C)	2500 kVA / 2250 kVA	2750 kVA / 2500 kVA	3000 kVA / 2700 kVA
Nominal AC power at cos φ =0.8 (at 35°C / at 50°C)	2000 kW / 1800 kW	2200 kW / 2000 kW	2400 kW / 2160 kW
Nominal AC current $I_{AC, nom}$ = Max. output current $I_{AC, max}$	2624 A	2646 A	2646 A
Max. total harmonic distortion	< 3% at nominal power	< 3% at nominal power	< 3% at nominal power
Nominal AC voltage / nominal AC voltage range[1) 8)]	550 V / 440 V to 660 V	600 V / 480 V to 690 V	655 V / 524 V to 721 V[9)]
AC power frequency	50 Hz / 47 Hz to 53 Hz 60 Hz / 57 Hz to 63 Hz		
Min. short-circuit ratio at the AC terminals[10)]	> 2		
Power factor at rated power / displacement power factor adjustable[8) 11)]	● 1 / 0.8 overexcited to 0.8 underexcited ○ 1 / 0.0 overexcited to 0.0 underexcited		
Efficiency			
Max. efficiency[2)] / European efficiency[2)] / CEC efficiency[3)]	98.6% / 98.3% / 98.0%	98.7% / 98.5% / 98.5%	98.8% / 98.6% / 98.5%
Protective Devices			
Input-side disconnection point	DC load-break switch		
Output-side disconnection point	AC circuit breaker		
DC overvoltage protection	Surge arrester, type I		
AC overvoltage protection (optional)	Surge arrester, class I		
Lightning protection (according to IEC 62305-1)	Lightning Protection Level III		
Ground-fault monitoring / remote ground-fault monitoring	○ / ○		
Insulation monitoring	○		
Degree of protection: electronics / air duct / connection area (as per IEC 60529)	IP65 / IP34 / IP34		
General Data			
Dimensions (W / H / D)	2780 / 2318 / 1588 mm (109.4 / 91.3 / 62.5 inch)		
Weight	< 3400 kg / < 7496 lb		
Self-consumption (max.[4)] / partial load[5)] / average[6)])	< 8100 W / < 1800 W / < 2000 W		
Self-consumption (standby)	< 370 W		
Internal auxiliary power supply	Integrated 8.4 kVA transformer		
Operating temperature range[8)]	−25 to 60°C / −13 to 140°F		
Noise emission[7)]	67.8 dB(A)		
Temperature range (standby)	−40 to 60°C / −40 to 140°F		
Temperature range (storage)	−40 to 70°C / −40 to 158°F		
Max. permissible value for relative humidity (condensing / non-condensing)	95% to 100% (2 month / year) / 0 % to 95%		
Maximum operating altitude above MSL[8)] 1000 m / 2000 m / 3000 m	● / ○ / ○ (earlier temperature-dependent derating)		
Fresh air consumption	6500 m³/h		
Features			
DC connection	Terminal lug on each input (without fuse)		
AC connection	With busbar system (three busbars, one per line conductor)		
Communication	Ethernet, Modbus Master, Modbus Slave		
Communication with SMA string monitor (transmission medium)	Modbus TCP / Ethernet (FO MM, Cat-5)		
Enclosure / roof color	RAL 9016 / RAL 7004		
Supply transformer for external loads	○ (2.5 kVA)		
Standards and directives complied with	CE, IEC / EN 62109-1, IEC / EN 62109-2, BDEW-MSRL, IEEE1547, Arrêté du 23/04/08		
EMC standards	CISPR 11, CISPR 22, EN55011:2017, EN 55022, IEC/EN 61000-6-4, IEC/EN 61000-6-2, IEC 62920, FCC Part 15 Class A	CISPR 11, CISPR 22, EN55011:2017, EN 55022, IEC 62920, FCC Part 15 Class A	
Quality standards and directives complied with	VDI/VDE 2862 page 2, DIN EN ISO 9001		
● Standard features ○ Optional			
Type designation	SC-2500-EV-10	SC-2750-EV-10	SC-3000-EV-10

1) At nominal AC voltage, nominal AC power decreases in the same proportion
2) Efficiency measured without internal power supply
3) Efficiency measured with internal power supply
4) Self-consumption at rated operation
5) Self-consumption at < 75% Pn at 25°C
6) Self-consumption averaged out from 5% to 100% Pn at 35°C
7) Sound pressure level at a distance of 10 m
8) Values apply only to inverters. Permissible values for SMA MV solutions from SMA can be found in the corresponding data sheets.
9) AC voltage range can be extended to 753V for 50Hz grids only (option „Aux power supply: external" must be selected, option "housekeeping" not combinable).
10) A short-circuit ratio of < 2 requires a special approval from SMA
11) Depending on the DC voltage

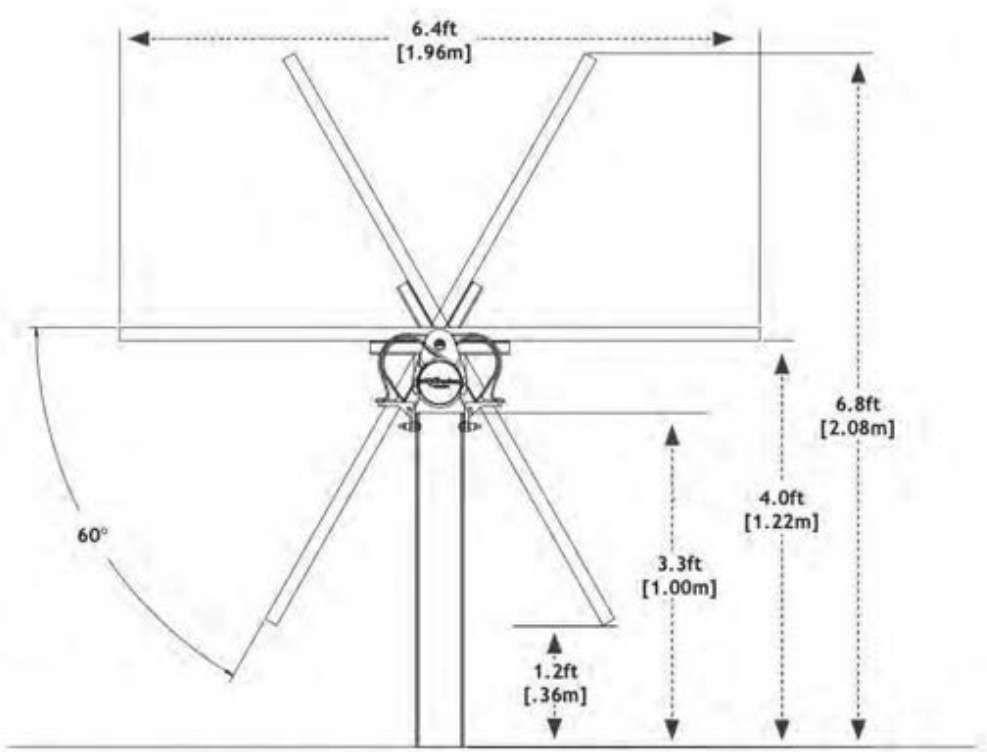
SYSTEM DIAGRAM



TEMPERATURE BEHAVIOR (at 1000 m)



SC22003000EV-DEN1903:V54 Printed on FSC paper. All products and services described and all technical data are subject to change, even for reasons of country-specific deviations, at any time without notice. SMA assumes no liability for typographical or other errors. For current information, please visit www.SMA-Solar.com.

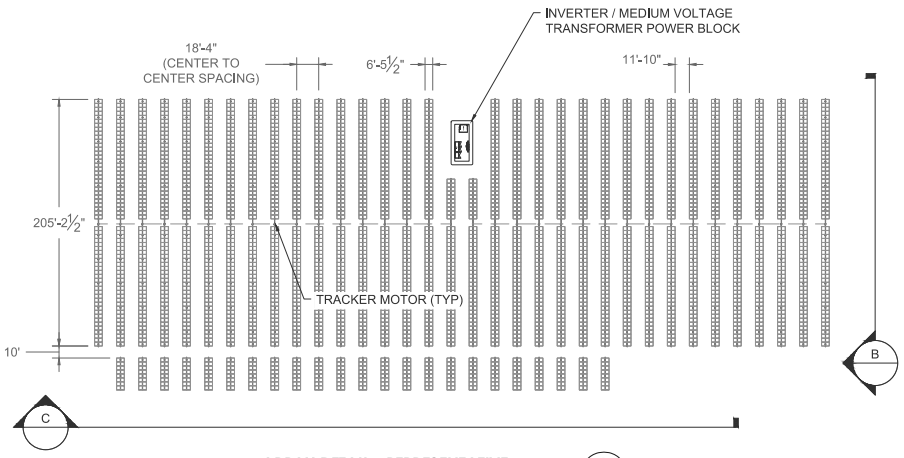




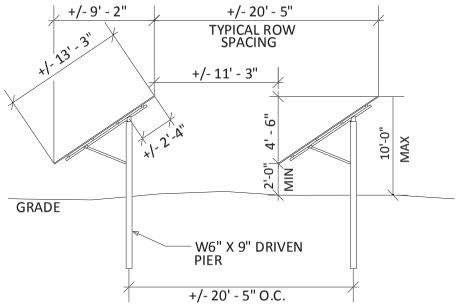


Calneva Photovoltaic Solar Energy Systems

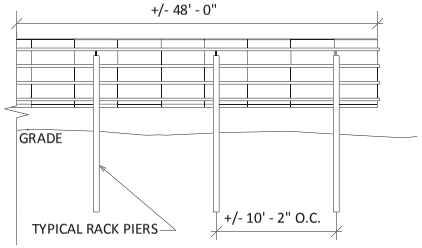
Trackers and Panels with Dimensions



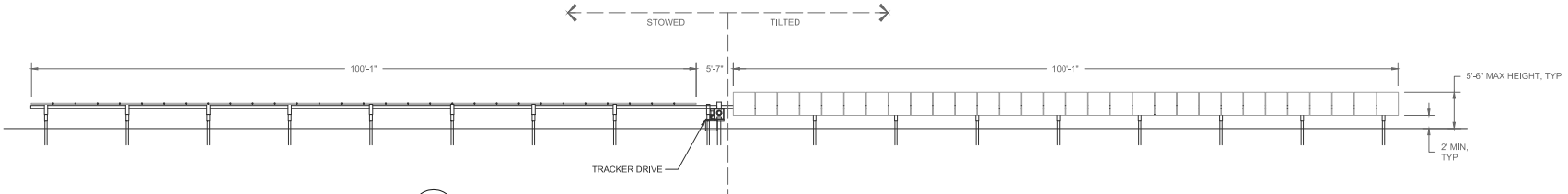
ARRAY DETAIL - REPRESENTATIVE (A)
NTS



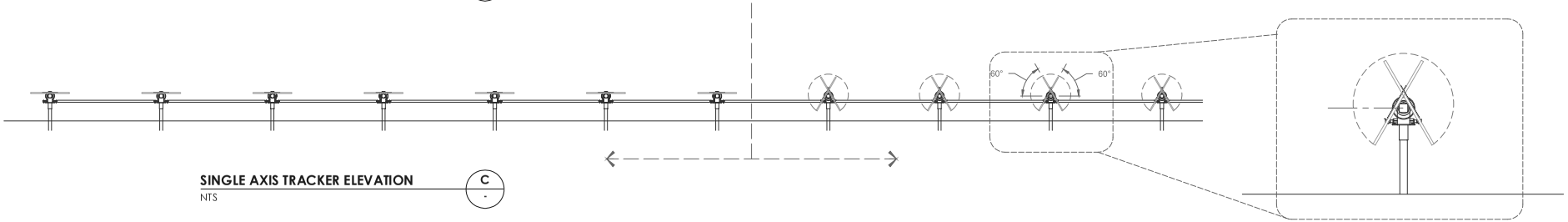
TYPICAL SOLAR ARRAY RACK DETAIL AND END ELEVATION (D)
NTS



SOLAR ARRAY RACK DETAIL ELEVATION (E)
NTS



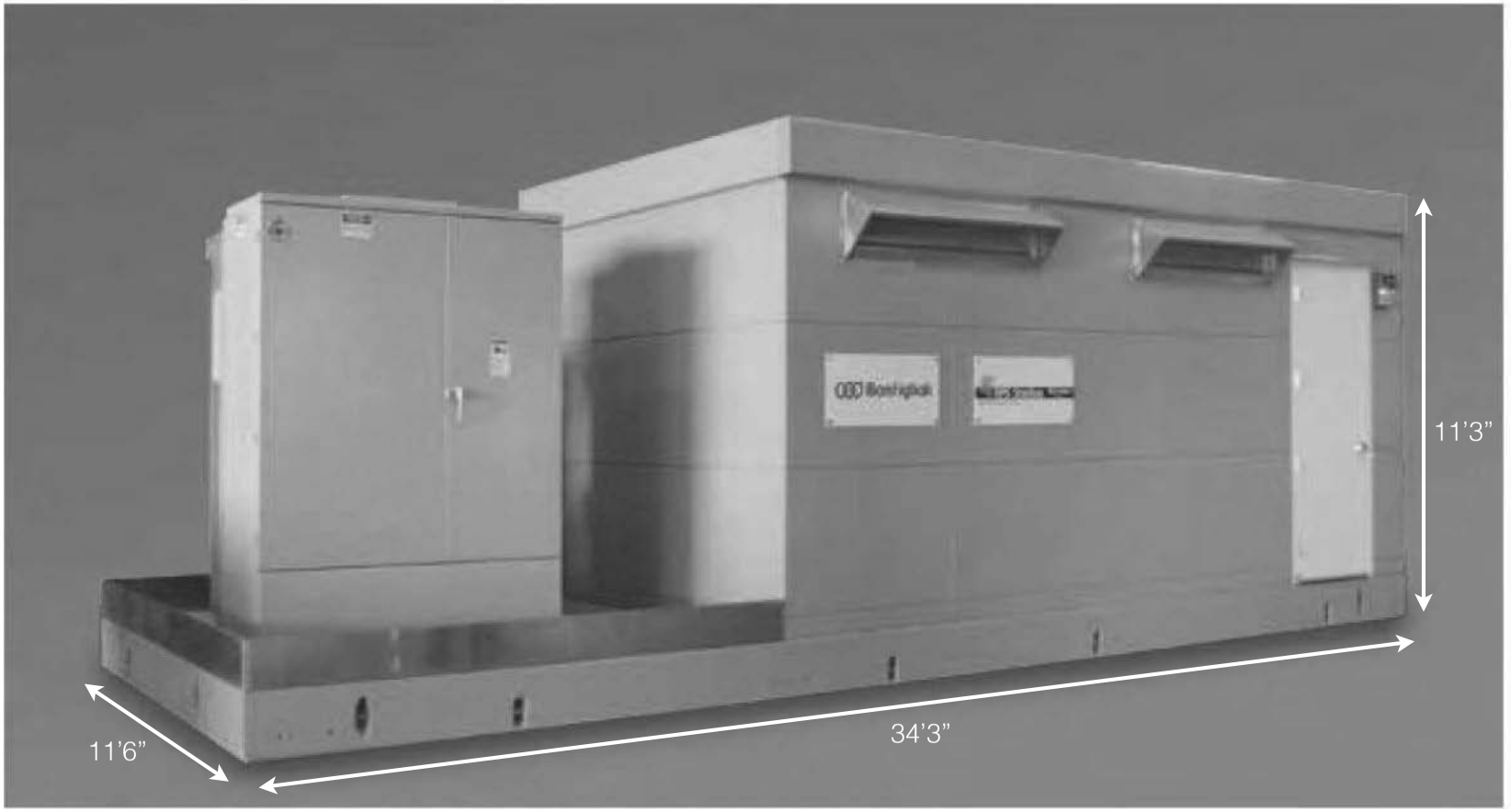
SINGLE AXIS TRACKER ELEVATION (B)
NTS



SINGLE AXIS TRACKER ELEVATION (C)
NTS

Mechanical Components – Single-Axis Tracking and Fixed-Tilt Systems

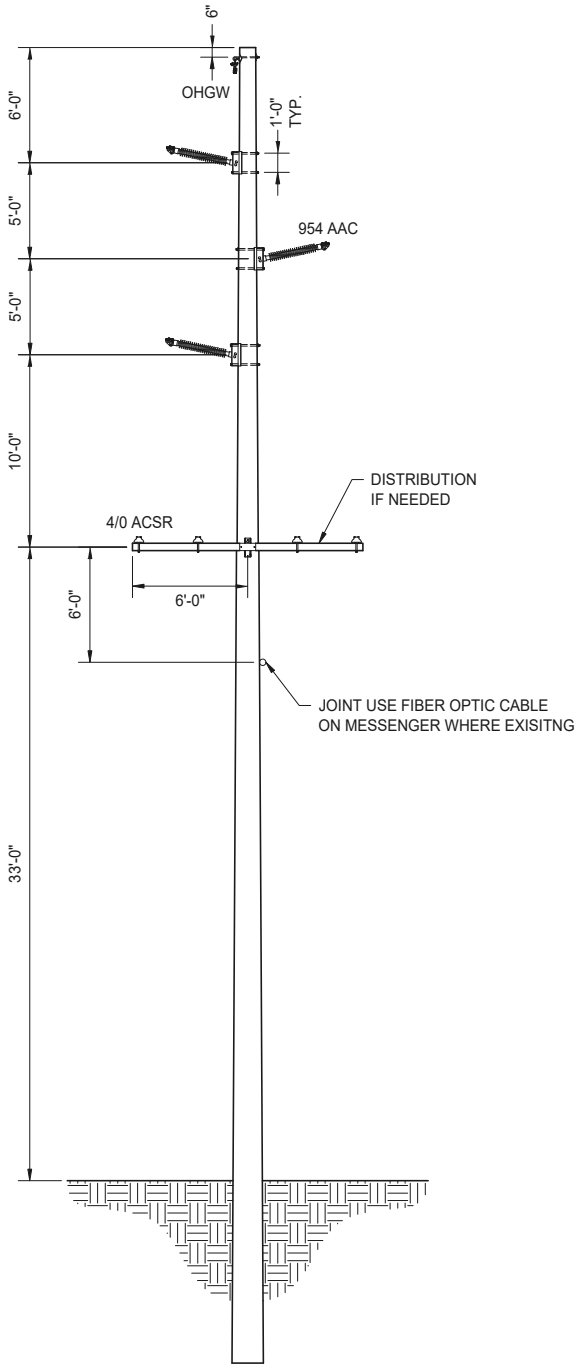
Calneva BESS/PSES



Calneva Photovoltaic Solar Energy Systems

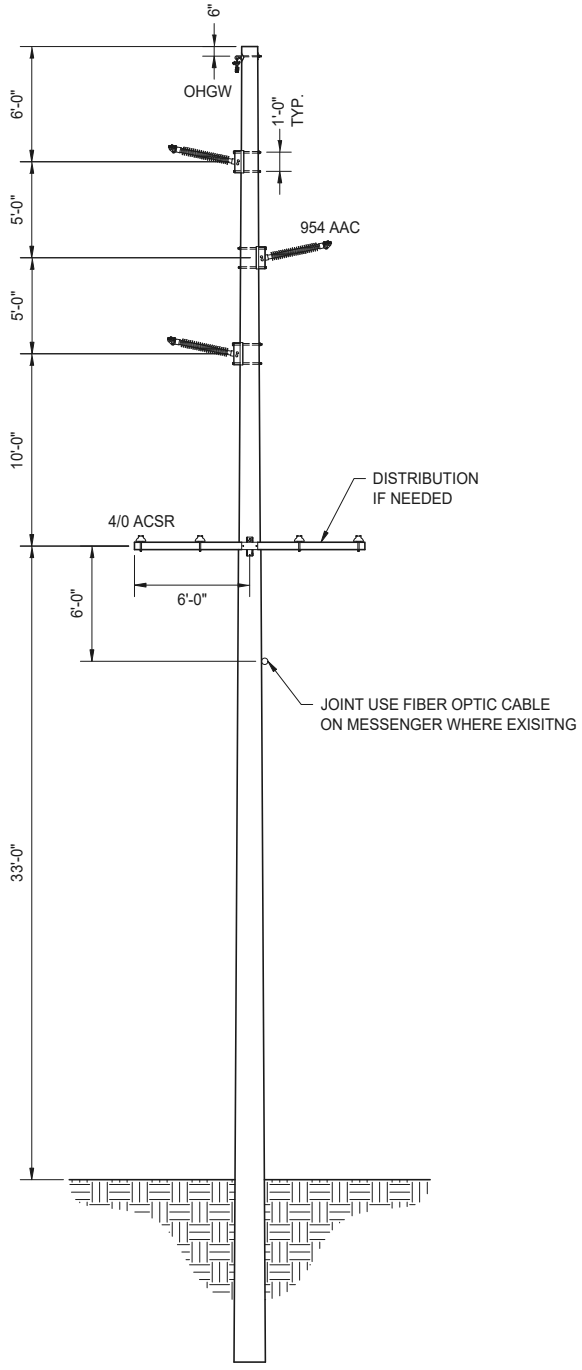
Inverter Station with Dimensions

REV	REVISIONS	DATE	DRN	DSGN	CKD	APPD
*	*	*	*	*	*	*



DSGN	SH	03/05/18	Calneva BESS/PSES Interconnect Poles	JOB NUMBER / REV
DRN	DO	03/05/18	PRELIMINARY STRUCTURE CONFIGURATIONS	
CKD	JT	03/05/18	TYPICAL TANGENT STRUCTURE WITH DISTRIBUTION UNDERBUILD	DRAWING NUMBER
SCALE:	1"=10'			
REFERENCE DRAWINGS	FOR 8.5x11 DWG ONLY			

REV	REVISIONS	DATE	DRN	DSGN	CKD	APPD
*	*	*	*	*	*	*



DSGN	SH	03/05/18		
DRN	DO	03/05/18		
CKD	JT	03/05/18		
SCALE:	1"=10'			
FOR 8.5x11 DWG ONLY				

REFERENCE DRAWINGS

Washoe BESS/PSES Interconnect Poles

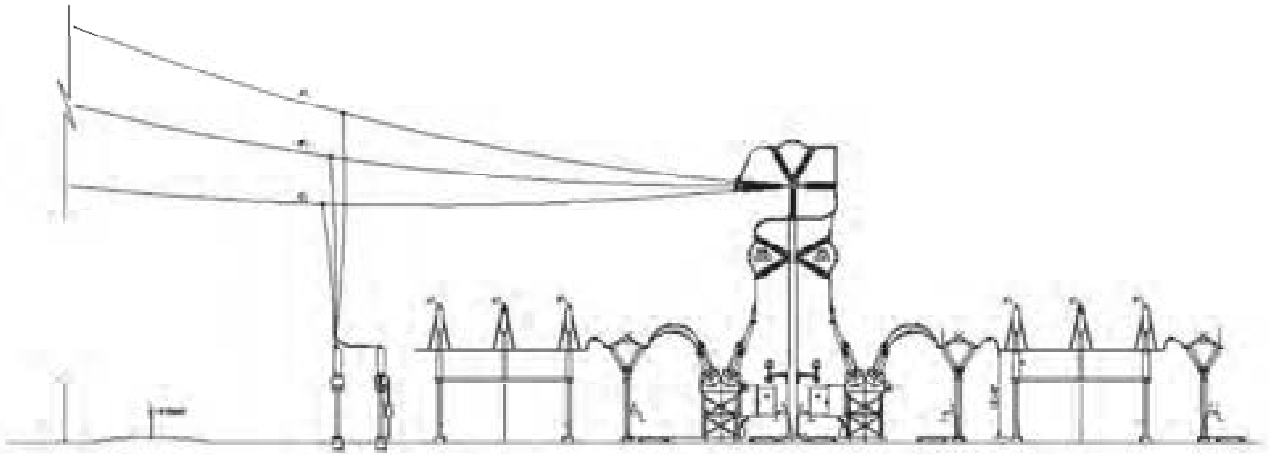
PRELIMINARY STRUCTURE CONFIGURATIONS

TYPICAL TANGENT STRUCTURE WITH DISTRIBUTION UNDERBUILD

JOB NUMBER

REV

DRAWING NUMBER



Typical Three-Bank Substation Profile
Windsor Substation Project

NOT TO SCALE

Preliminary and subject to change based on Praana requirements, final engineering, and other factors.

EXHIBIT G

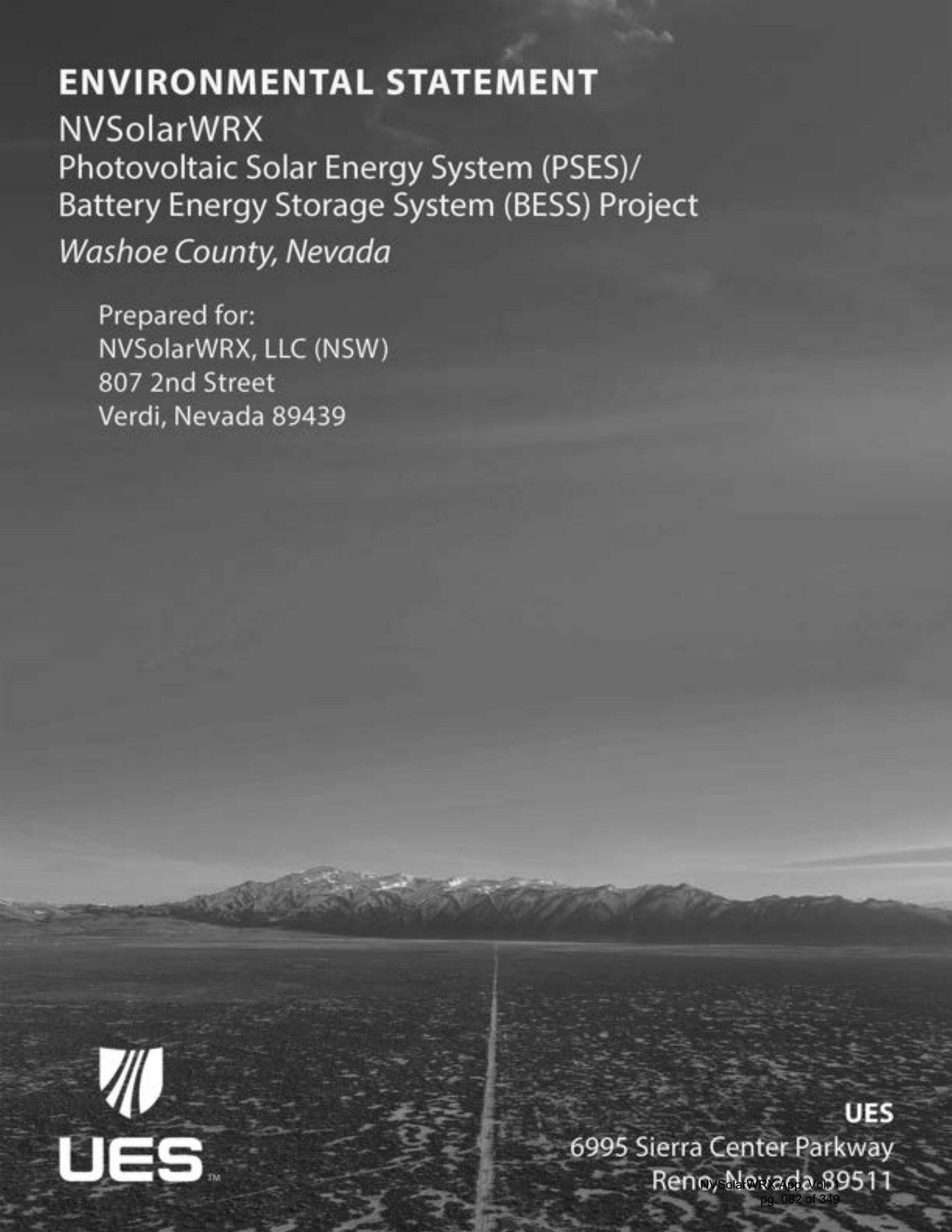
Environmental Statement

ENVIRONMENTAL STATEMENT

NVSolarWRX
Photovoltaic Solar Energy System (PSES)/ Battery Energy Storage System (BESS) Project

Washoe County, Nevada

Prepared for:
NVSolarWRX, LLC (NSW)
807 2nd Street
Verdi, Nevada 89439



UES

UES
6995 Sierra Center Parkway
Reno, Nevada 89511

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Appendix A – Phase I Environmental Assessment Report

Appendix B- Biological Assessment Report

Appendix C – Class III Cultural Inventory

Appendix D – El Centro BESS Project Noise Study

LIST OF ACRONYMS

AC Paving—Asphalt Concrete
ADT— Average Daily Traffic
ANSI—American National Standards Institute
APN—Assessor's Parcel Number
ASME—American Society of Mechanical Engineering
ASTM—American Society for Testing and Materials
BACT—Best Available Emission Control Technology
BMP— Best Management Practices
BP—Before Present
BPS— Best Performance Standards
BESS—Battery Energy Storage System
CAA—Clean Air Act
CCPS—Center for Chemical Process Safety
CD—Community Design
CERCLA— Comprehensive Environmental Response Compensation and Liability Act
CERCLIS-NFPRA— U.S. EPA Comprehensive Environmental Response, Compensation, and Liability Information System - No Further Remediation Action Planned List
CFM—Cubic Feet per Minute
CFR—Code of Federal Regulations
CH— Critical habitat
CHMIRS— Chemical Hazardous Materials Incident Report System
CNEL— Community Noise Equivalent Level
CO—Carbon Monoxide
CO_2—Carbon Dioxide
Corps— United States Army Corps of Engineers
CORRACTS list—Resources Conservation and Recovery Act Corrective Action List
County—Washoe County
dB—Decibel
dBA—A-Weighted Decibel
DFMEA— Design Failure Mode and Effects Analysis
DHS— Department of Homeland Security
DOD—Department of Defense

DOI— Department of the Interior
DOT— United States Department of Transportation
EMD—Emergency Medical Dispatch
EDR— Environmental Database Report
EPA—United States Environmental Protection Agency
ESA—Environmental Site Assessment
ERNS— United States Environmental Protection Agency Emergency Response Notification System
FAR— Floor Area Ratio
FCC— Federal Communications Commission
FE— Federally endangered
Fed/ OSHA— Occupational Safety Health Administration
FEMA— Federal Emergency Management Agency
FESA— Federal Endangered Species Act
FIRM— Flood Insurance Rate Map
FMMP— Farmland Mapping and Monitoring Program
FSP— Facility Security Plan
FT— Federally threatened
GAMAQI— Guide for Assessing and Mitigating Air Quality Impacts
GHG—Greenhouse Gas Emissions
GIP— General Industrial Permit
GPM—Gallons Per Minute
HAP—Hazardous Air Pollutant
HCFC—Hydrofluorocarbons
HCP—Habitat Conservation Plan
HMRIS—Hazardous Materials Incident Report System
HR—Hour
HSWA— Hazardous and Solid Waste Act
Hz— Hertz
IBC— International Business Code
IEEE— Institute of Electrical and Electronic Engineers
ISO—International Organization for Standardization
IRS— United States Internal Revenue Service
ISR— Indirect Source Review
KOP— Key Observation Point
kV— Kilovolt

KW—Kilo Watt

LB—Pound

L_{dn}—Day/Night Equivalent (sound measurement)

L_{eq}— Equivalent Continuous Sound Pressure Level

LLC—Limited Liability Corporation

LOS—Level of Service

LESA—Limited Environmental Site Assessment

MBTA—Migratory Bird Treaty Act

MCE—Maximum Credible Earthquake

MEI—Maximum Exposure Individual

MOU— Memorandum of Understanding

MSDS—Material Safety Data Sheet

MSL—Mean Sea Level

MW—Mega Watt

Na. RC— National Research Council

NAAQS—National Ambient Air Quality Standards

NEC— National Electrical Code

NFPA—National Fire Protection Association

NHPA—National Historic Preservation Act

NIH— National Institute of Health

NMFS— National Marine Fisheries Service

NOx—Nitrogen Oxides

NO_2—Nitrogen Dioxide

NOAA— National Oceanic and Atmospheric Administration

NPDES— National Pollutant Discharge Elimination System

NPS— Non-Point Source

NRC— National Response Center

NSW— NVSoalrWRX, LLC

NTSB—National Transportation Safety Board

O_3—Trioxygen

OSBL—Outside Battery Limits

OSHA—Occupational Safety Health Administration

PPA—Power Purchase Agreement

Pb—Lead

PCE – Passenger Vehicle Equivalent

PFS—Public Facilities and Services

PHMSA— Pipeline and Hazardous Materials Safety Administration

PSES— Photovoltaic Solar Energy System

PSREC — Plumas-Sierra Rural Electric Cooperative

$PM_{2.5}$—Fine Particulate Matter

PM_{10}—Respirable Particulate Matter

PPM—Parts Per Million

PSI—Pounds Per Square Inch

PV—Photovoltaic

RACT—Reasonably Available Control Technology

RCRA— Resource Conservation and Recovery Act

RCRA-LQG— Resource Conservation and Recovery Act Large Quantity Generator

RCRA-SQG— Resource Conservation and Recovery Act Small Quantity Generator

REC— Recognized Environmental Condition

RMP— Risk Management Plan

ROG—Reactive Organic Gasses

ROW—Right of Way

RPS—Renewable Portfolio Standard

RSPA— Research and Special Programs Administration

RTTM— Real Time Transient Model

SBS—Shreem Brzee Solar, LLC

SCADA—Supervisory Control and Data Acquisition

SCP—Source Control Program

SGIP—Self Generation Incentive Program

SE— State Endangered

SO_2—Sulfur Dioxide

SO_x—Sulfur Oxide

SPCC— Spill Prevention, Control, and Countermeasures Plans

SR— State Rare

ST—State Threatened

SWPPP—Storm Water Pollution Prevention Plan

TAC— Toxic Air Containment

TFV—Threshold Friction Velocity

TMDL— Total Maximum Daily Load

TOP—Take Over Point
TRIS—Toxic Chemical Release Inventory System
TSA— Transportation Security Administration
TSD—Treatment, Storage, and Disposal Facilities
UBC—Uniform Building Code
UFC— Uniform Fire Code
UES – Universal Engineering Sciences, Inc.
UL— Underwriters Laboratories
UNS—Unified Numbering System
USC—United States Code
USDA—United States Department of Agriculture
USGS—United States Geological Survey
USFWS—United States Fish and Wildlife Service
V—Volt
VDE—Visible Dust Emissions
VOC—Volatile Organic Compounds
VPP—Virtual Power Plants
VRU— Vapor Recovery Unit
VTS— Vessel Traffic Service
WDR—Waste Discharge Report

1.0 INTRODUCTION

NVSolarWRX, LLC ("NSW"), plans to construct a photovoltaic solar energy system (PSES) with up to 450 MW of power generation from the installation of up to approximately 775,000 solar PV modules on a single axis tracking system and an up to 200 MW battery electrical storage system (BESS) (the "NVSolarWRX Project" or the "Project") on 1,680 +/- acres of privately owned land (the "Property"), comprised of four (4) parcels known as Washoe County Assessor's Parcel Numbers (APNs) 074-103-01, 074-103-05, 074-451-20, and 074-452-01) of undeveloped, vacant rangeland and a portion of Dead Horse dry lake bed located in Washoe County, Nevada, approximately 40 miles north of Reno in the Honey Lake Valley.

Energy produced and/or stored at the project site would be dispatched to the local grid via a proposed 345 kV generation-tie line to be placed in an existing private utility easement and access easement along the Rainbow Way corridor which has been designated a regional significant transmission corridor in the Truckee Meadows Regional Planning Agency's Regional Utility Corridor Map stretching from the project property to the NV Energy Fort Sage substation (located approximately 4 miles southwest of the project property). The 345 kV generation tie-line has also been planned for by the Washoe County Planning Commission which has issued Washoe County Special Use Permit Case Number WSUP23-0003 for the construction of a 345 kV transmission line in the Rainbow Way Corridor.

The Project will also include:

- Electrical inverters and transformers
- Battery energy storage system (BESS)
  - o Up to 200 battery storage enclosures to store 200 megawatts (MW) of electricity for dispatch
  - o BESS power inverters, transformers switches, MV switchgear
- On-site electrical substation
- Meteorological stations

- Remote monitoring system (SCADA)
- Site access roads and maintenance access roads
- Security fencing
- Gen-Tie line structures to interconnect with the NV Energy Fort Sage substation, south of the solar generation site
- Gen-Tie Laydown Area

This Environmental Statement (ES) evaluates potential environmental impacts of the proposed NVSolarWRX Project to be reviewed by the Public Utility Commission of Nevada (PUCN) in compliance with the Utilities Environmental Protection Act (UEPA).

The project property is zoned by Washoe County as General Rural (GR) which allows for the development of energy and electric transmission facilities via a special use permit. Based on discussion with Washoe County Community Services Department staff (*Roger Pelham, MPA, Senior Planner*), it is anticipated that the Project will meet the definition of "*Projects of Regional Significance*". Therefore, approval by the Washoe County Planning Commission and the Washoe County Board of Supervisors is required.

1.1 PROJECT PURPOSE AND NEED

NSW is seeking to build the Project in response to the Nevada's Portfolio Standard (*NRS 704.7801 through 7828, NAC 704.8831*) which was adopted to "*Encourage and accelerate the development of new renewable energy projects for the economic, health and environmental benefits provided to the people of this State*". The proposed NVSolarWRX project would provide renewable energy and critically needed flexibility attributes needed to advance Nevada's renewable energy goals, climate policies, and to enhance electrical grid reliability. Advancements in solar energy production technology and modern large scale module production have made solar energy production an attractive alternative to traditional fossil fuel energy production from both an environmental and economic perspective. Solar energy allows the State of Nevada to decrease dependence on fossil fuels which are subject to the fluctuations of the global energy market. Solar energy also benefits

the economy by generating jobs, business income, and tax revenue for Washoe County and Nevada.

Nevada Power Company ("Nevada Power") and Sierra Pacific Power Company ("Sierra" and, together with Nevada Power, the "Companies" or "NV Energy") have adopted a joint integrated resource plan ("2024 Joint IRP"). The 2024 Joint IRP focuses on affordability, reliability, and sustainability. The 2024 Joint IRP continues the Companies' commitment to meeting the state's clean energy policies and goals, while also meeting the energy needs and demands of their customers. As part of meeting the energy demands for Nevada the 2024 Joint IRP calls for a combination of long-term power purchase agreements ("PPAs") and short-term energy transactions. Similarly, the Companies meet the requirements of Nevada's RPS through Public Utility Commission of Nevada-approved long-term PPAs with renewable energy resources, agreements for purchase of portfolio energy credits ("PCs"), and energy efficiency programs which NSW contributes to such opportunities for PPAs.

1.2 AUTHORIZING ACTIONS

The primary approval required for the NVSolarWRX Project would be issued by PUCN. The PUCN will review the ES in accordance with UEPA guidelines. Should the Project be approved, the PUCN will issue an Order assessing compliance with UEPA guidelines and would subsequently issue a Permit to Construct after all necessary development approvals have been obtained from federal, state, and local agencies. The PUCN list of potential federal, state, and local permits was reviewed. Table 1 lists those permits that may be necessary for the Project for the PUCN to issue a Notice to Construct. These permits and requirements are typical and well understood for projects of this nature in the Honey Lake Valley. Table 1 also lists the issuing agency for each permit and the anticipated completion date.

Table 1. Regulatory Permits and Approvals

Permit	Issuing Agency	Projected Completion Date
UEPA Order	PUCN	Q4 2025
UEPA Permit to Construct	PUCN	Q4 2025
Special Use and Major Grading Permit	Washoe County	Q3 2025
Dust Control Plan	Nevada Department of Environmental Protection	Q4 2025
Temporary Construction Water Permit (water rights)	Nevada Department of Environmental Protection	Q4 2025
Dust Control Permit	Washoe County	Q1 2026
Grading, Building and Fence Permit	Washoe County	Q1 2026
Storm Water Pollution Prevention Plan	Nevada Department of Environmental Protection	Q1 2026

1.3 ENVIRONMENTAL STATEMENT ORGANIZATION

To aid the reviewers and decision-makers, this section outlines the following sections:

- **1.0 Introduction**. This chapter provides a brief general description of the Project and its purpose and need. The section also summarizes the Project location, the state and local reviews, regulatory approvals, and permits likely to be required.
- **2.0 Description of Proposed Action and Alternatives**. This chapter describes the Project as well as the alternatives that were considered but eliminated from detailed consideration along with the rationale for their elimination.
- **3.0 Existing Setting, Environmental Consequences, and Mitigation Measures**. This chapter describes the existing environment at and near the site. It also details the potential environmental consequences of the Project and mitigation measures designed to reduce, minimize, or avoid impacts so they are reduced to an acceptable level. In

addition, a table summarizing the potential effects, the recommended mitigation measures, along with the timing of those measures and identification of entities responsible for implementation and monitoring, has been included.

- **4.0 List of Preparers and Reviewers**. Lists persons who contributed to the preparation and review of this EA.
- **5.0 References**. Lists references used in this EA.
- **Appendices**. Supplemental information on permitting and mitigation measures.

2.0 DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

This chapter describes the project location, proposed action, and alternatives considered for this project.

2.1 PROJECT LOCATION AND ACCESS

The NVSolarWRX Project area consists of approximately 1,680 +/- acres of privately owned land ("Property"), located in Washoe County, Nevada, approximately 40 miles north of the City of Reno in the Honey Lake Valley, three miles east to the Nevada/California state line and approximately one quarter (1/4) mile south of the Union Pacific railroad corridor which runs in a predominately east/west direction, and an approximately 7 mile long corridor ("Gen-Tie Corridor") within an access and utility easement corresponding to the Rainbow Way public right of way straddles the section line which forms the western limit of the project property, extending 30 feet from either side of said section line and running north/south from the Union Pacific railroad corridor to Anaho Road. Said easement is documented in Record of Survey Pyramid Lake Ranches Unit 1, January 18, 1961 - Washoe County Recorder's Office File No. 331360; Record of Survey Pyramid Lake Ranches Unit 2, February 20, 1961- Washoe County Recorder's Office File No. 332860; and 55 Grant, Bargain, and Sale Deeds recorded at the Washoe County Recorder's Office along the existing Rainbow Way and Section Line, granting an non-exclusive easement over existing roads to be used for ingress, egress, and utilities. Rainbow Way corridor which has been designated a regional significant transmission corridor in the Truckee Meadows Regional Planning Agency's Regional Utility Corridor Map stretching from the project property to the NV Energy Fort Sage substation. The 345 kV generation tie-line has also been planned for by the Washoe County Planning Commission which has issued Washoe County Special Use Permit Case Number WSUP23-0003 for the construction of a 345 kV transmission line in the Rainbow Way Corridor.

Potential disturbance within this easement for the installation of a Generation Tie Line is estimated to total approximately 12 acres, resulting a total disturbance area of approximately 1,692 acres. The entirety of this acreage and the vast majority of the surrounding vicinity is privately owned vacant range land.



△ Project Location

N

0 60,000 120,000

Feet

Aerial imagery provided by Esri.
Projection: NAD 1983 2011 StatePlane California II FIPS 0402 Ft US

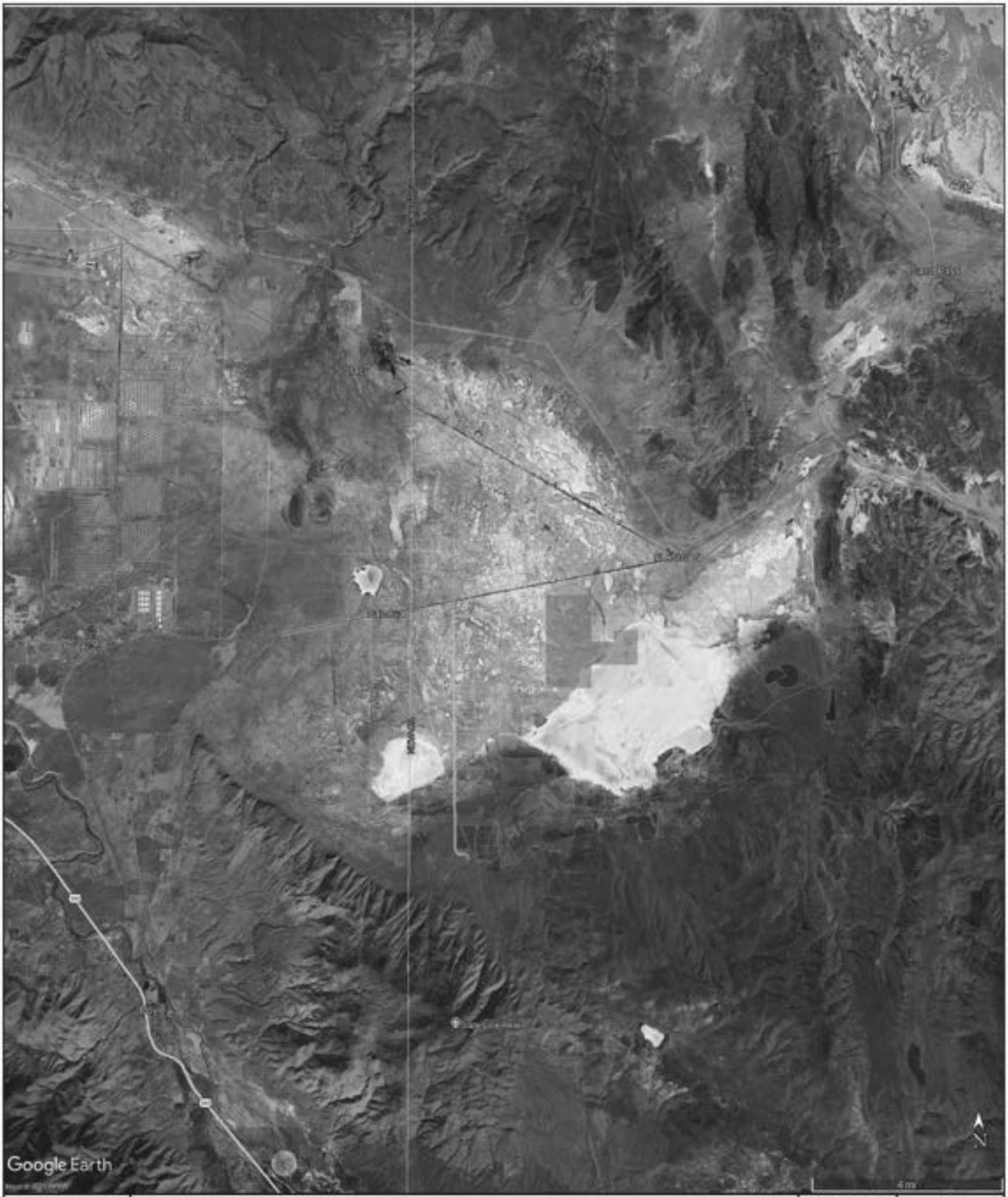
UES

PROJECT LOCATION MAP

NVSolarWRX PSES/BESS Project

Washoe County, NV

FIGURE	1
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025
411-2300008.0000	



UES

PROJECT VICINITY MAP

NVSolarWRX PSES/BESS Project
Washoe County, NV

FIGURE	2
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025
PROJECT NO.	108.0000



UES

PROJECT BOUNDARY MAP

NVSolarWRX PSES/BESS Project
Washoe County, NV

FIGURE	3
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025
[illegible]108.0000	

2.2 PROJECT FACILITIES

This section discusses the Project layout and design for the solar and battery energy storage facilities, ancillary facilities, and associated structures. The site layout is shown in Figure 4.

2.2.1 Major Equipment and Site Arrangement

The Photovoltaic Solar Energy System (PSES) utilizes photovoltaic (PV) panels/modules to absorb solar radiation/sunlight and convert it to electricity. The PSES is to consist of: (1) a solar field featuring PV a array comprised of up to 775,000 PV modules mounted on single axis tracking steel structures; (2) an electrical collection system that aggregates the output from the PV panels and converts the electricity from direct current (DC) to alternating current (AC); (3) a project substation where all of the facility output is combined and transformed to a voltage of 345 kilovolts (kV); (4) a Battery Energy Storage System (BESS); (5) a generation tie line used to transmit the electrical power to the electrical grid; (6) communications infrastructure including a microwave or fiber optic cable; and (7) civil infrastructure including driveways, and fencing.

The Solar PV facility's major equipment includes:

- PV modules
- AC or DC Coupled BESS
- Single-Axis Tracking Module Racking System
- DC combiner boxes
- Inverter Skid Assemblies, including:
    - DC to AC inverters
    - Medium voltage (MV) transformers
- Project substation including one 34.5-345 kV step-up transformer
    - 34.5 kV Capacitor Banks as required
- Plant control system

The design would include PV modules, inverters, and MV transformers combined into units that are repeated to reach the required capacity. The proposed PV facility would use commercially proven PV modules, BESS, inverters, and transformers. Inverter and transformer manufacturers and capacities would be selected based on cost, efficiency, reliability, and market availability.

Photovoltaic Modules

Solar energy would be captured by an array of PV panels mounted to a single-axis tracking system. The high-efficiency, commercially available PV panels convert incoming sunlight to DC electrical energy. The panels are arranged in series to increase the DC system voltage to approximately 1,500 volts. These series chains of panels are called "strings" in industry terms and provide the basic building block of power conversion in the solar array. The strings are combined in the solar field through an above or below ground DC collection system and then further grouped together at the inverter stations, where the energy is converted to AC and then stepped up to an intermediate voltage, typically 34.5 kV. The chosen PV panel would be either crystalline silicon or thin film and would be well suited for the desert environment due to their durability and reliability.

The tracking system would be supported, when practical, by driven piers (piles) directly embedded into the ground and would be parallel to the ground. The system would rotate slowly throughout the day at a range of+/- 60 degrees facing east to west to stay perpendicular to the incoming solar rays so that production can be optimized.

Each tracker would hold approximately 27 to 110 panels (depending on final configuration) and, at its highest rotated edge, would have a maximum height of approximately 15 feet above grade, depending on the dimensions of the chosen panel. The minimum clearance from the lower edge of the panel to ground level is approximately 12 to 24 inches, pending final design.

The panel connection electrical system would be suspended under the PV panels and at main junctions would be placed under ground and routed to the inverter stations.

Inverter Stations

The inverters convert the DC power to AC power and AC output voltage is boosted to 34.5 kV through a MV Step-up Transformer. The inverter/MV transformer together are referred to as an Inverter Skid Assembly. From each such transformer, electricity would be conveyed via an underground collector circuit to the project substation. The inverter stations would be up to 13 feet in height and perform three critical functions for the solar plant: (1) collect DC power in a central location, (2) convert the DC power into AC power, and (3) convert low-voltage AC power to MV AC power. The inverter stations are typically open-air and well suited for desert environments. The stations consist of DC collection equipment, utility-scale inverters, and a low- to medium-voltage transformer. The output power from the inverter stations would be fed to the AC collection system through an above or below ground collection system. This AC collection system substation would deliver the electricity to the onsite substation, where the voltage would be stepped up to the interconnection voltage.



SYSTEM SPECIFICATIONS	
MODULE MANUFACTURER	JINKO SOLAR
MODULE MODEL	JKM540M-72HL4-TV
MODULE RATING	540 W
TOTAL MODULE QTY	773,064
MODULES PER STRING	27
TOTAL NUMBER OF STRINGS	28,632
SYSTEM SIZE DC	417 MW

JINKO 540W MODULE DIMENSION

GCR TABLE			
	FEET	METER	
X	7.46	2.27	MODULE WIDTH
Y	11.19	3.41	AISLE WIDTH
Z	18.65	5.69	PITCH
GCR	40.0%		= X/Z = (Z-Y)/Z

PRELIMINARY
NOT FOR
CONSTRUCTION

UES

Site Layout
NVSolarWRX
Washoe County, Nevada

Date: FEB 2025

2.2.2 Project Substation

The project substation would be located along the western boundary of the Project site (as shown on Figure 3). The substation is a central hub for the 34.5 kV collector circuits and increases the electricity voltage from 34.5 kV to 345 kV. The substation includes, but is not limited to the following major components:

- 34.5 kV bus and associated switching devices
- 345 kV bus and associated switching devices
- 34.5/345 kV transformers
- 34.5 kV circuit breakers
- 345 kV circuit breakers
- 34.5 kV capacitors (as required)
- Grounding grid
- Perimeter security fence

The footprint of the onsite substation would be approximately 15 acres. The proposed Project onsite substation would consist of components up to 100 feet in height, and overhead lines constructed with up to 95-foot-tall poles. The communications microwave at the substation would be placed on a pole up to 10 feet in height.

2.2.3 Gen-tie Lines and Associated Structures

The gen-tie power line route from this facility would run approximately seven miles (2 miles west to Rainbow Way then 5 miles south) to the NV Energy Fort Sage Substation, along the Truckee Meadows Regional Planning Agency's designated Rainbow Way 345 kV Regional Utility Corridor. Rainbow Way corridor was designated a regional significant transmission corridor in the Truckee Meadows Regional Planning Agency's "Regional Utility Corridor Map" stretching from the project property to the NV Energy Fort Sage substation. The 345 kV generation tie-line has also been planned for by the Washoe County Planning Commission which has issued Washoe County Special Use Permit Case Number WSUP23-0003 for the construction of a 345 kV transmission line in the Rainbow Way Corridor.

The gen-tie structures would be towers up to 100 feet high. The span between supporting structures ranges between 200 and 700 feet. Permission to construct a similar gen-tie, to be located within the same Rainbow way Regional Utility Corridor was previously granted to the neighboring Shreem Brzee Solar, LLC ("SBS") by the PUCN in October of 2024 (Docket Number 24-06015). Additionally, SBS and NSW signed a Memorandum of Understanding in November of 2023, in which they agree to co-develop said transmission facility in a manner that ensures both projects have access to the grid via the Rainbow Way Gen-Tie. However, because it is not certain which project will be ready to construct first, NSW requests they also be granted authority to construct said Gen-Tie to avoid any potential delays that may arise should the neighboring project not come to fruition. In the event that both facilities proceed as planned, the co-development and operation of the Rainbow Gen-Tie would subject to the terms of the agreement between the two parties and any all relevant FERC open access guidelines for future development in the event that additional developers in the vicinity should seek interconnections.

Access for construction and maintenance of the gen-tie line would be via the existing Rainbow Way public right of way and utility/access easement which stretch the entire length of the proposed Gen-tie route from the Project site to the NV Energy Fort Sage Substation. The design characteristics of the existing 345 kV gen-tie line are listed in Table 2.

Table 2. Typical Design Characteristics for a 345 kV Gen-Tie Line

Feature	345 kV Characteristics
Type of structure	Per NV Energy Design Specifications
Structure height	Up to 100 feet
Span length	Between 200-700 feet
Anticipated Number of structures	65 to 120
Voltage	345 kV
Conductor size	2 per Phase Bundle up to 795 kcmil ACSR-1.06" dia

Feature	345 kV Characteristics
Ground clearance of conductor	Minimum 30 feet
Pole foundation depth	19 to 24 feet
All-Dielectric Self-Supporting (ADSS) fiber optic cable	Installed on the side of transmission towers, below the 345 kV conductors
Optical ground wire (OPGW)	Strung above the 345 kV conductors

2.2.4 Gen-tie Interconnection/Point of Change of Ownership Pole

The Project's substation would connect to NV Energy's Fort Sage Substation approximately two miles west and five miles south of the proposed Project Substation via a 345 kV gen-tie line. The project Point of Change of Ownership pole (POCO) will be at the NV Energy Fort Sage substation. The gen-tie would also provide a communication path via OPGW fiber optic cable. A redundant communication path is also required, typically ADSS fiber optic cable. The +/- 7-mile gen-tie and POCO would be constructed and operated according to NV Energy specifications.

2.2.5 Battery Energy Storage System

The proposed Project would use a BESS consisting of either large format lithium-ion batteries or alternative battery technologies (such as flow batteries) that would have a capacity of up to 200 MWs which would be connected using either an AC-coupled or DC-coupled system. Selection of an AC or DC coupled system is ultimately determined through off-taker preference and contract terms.

An AC-coupled system would be connected to a bi-directional inverter to convert DC energy to AC energy, allowing for energy to flow in or out of the batteries to provide charge and discharge. This AC system would be coupled to the PV array at the inverter, AC collection system, or 34.5kV substation bus. Power switches and relays would protect the system. The system would consist of several housing units similar to shipping containers or buildings. The containers or buildings would occupy approximately up to 6 acres, depending on the size of

the system contracted and technology selected. The equipment enclosures and buildings would be located next to the on-site substation.

A DC-coupled system would consist of battery units located in containers adjacent to the solar inverters distributed throughout the solar arrays. The solar DC collection and the DC battery connection would connect on a common DC bus at the inverter. The containers would be similar in size (20-40 feet long) to the solar inverter skids. In some cases, depending upon the battery capacity, multiple containers may be located adjacent to a single inverter. The charge and discharge of the DC-coupled batteries would be controlled by the battery management system. DC-DC converters would be installed between the inverter and the batteries to control the DC voltage at the battery terminal. As is typical for the industry, inverters would be controlled by a central control system. The protections to the batteries would be internal to the battery management systems and control boxes located within the containers and inverters.

A battery supplier has not been selected at this time due to changing markets. The final battery supplier(s) would be selected prior to Project construction and would be subject to an industry- standard pre- qualification process.

The energy storage equipment would be enclosed in a structure that would conform with County standards in addition to National Fire Protection Agency Standard 855. Energy storage equipment will comply with UL-9540 and will account for the results of UL-9540A.The enclosures would have temperature control system consisting of fan, liquid, or equivalent. The energy storage system would be un-staffed and would have remote operational control and period inspections/maintenance performed, as necessary.

2.2.6 Electrical System for Plant Auxiliaries

During daylight hours, power for plant auxiliaries would be provided by the Project's electrical generation. During non-daylight hours, the Project would require small amounts of power to keep transformers energized, and for plant lighting and security. This auxiliary power would be provided by the onsite BESS.

2.2.7 Plant Auxiliaries Process Description

The following subsections describe the various power plant auxiliary systems associated with the Project.

Water

Water for construction and operations activities at the Project will be trucked to the project property from an offsite facility. NSW will contract with a water purveyor with existing water rights that are sufficient to supply the estimated 100-acre feet of water required for construction and 1-acre foot per year estimated for operations.

Plant Control System

The microprocessor-based plant control system (PCS) would provide control, monitoring, alarm, and data storage functions for plant systems as well as communication with the Solar Field supervisory control and data acquisition (SCADA) system. Redundant capability would be provided for critical PCS components so that no single component failure would cause a plant outage.

All field instruments and controls would be hard-wired to local electrical panels. Local panels would be hard-wired to the plant PCS system.

The NVSolarWRX Solar plant will be monitored and controlled from a remote operations center (ROC) located offsite. Communications between the NVSolarWRX facility and the ROC would be by either microwave or fiber optic connection.

Lighting System

The Project's lighting system would provide O&M personnel with illumination for both normal and emergency conditions. Lighting would be designed to provide the minimum illumination needed to achieve safety and security objectives and would be downward facing and shielded to focus illumination on the desired areas only. There would be no lighting in the solar field, so light trespass on the surrounding properties would be minimal. If lighting at individual solar panels or other equipment is needed for night maintenance, portable lighting would be used. There would be lighting at the substation and site entrances to

provide personnel with illumination for substation O&M under normal conditions and means of egress under emergency conditions.

Cathodic Protection Systems

Underground metal structures would have cathodic protection, as necessary, based on soil conditions, to avoid corrosion of metal surfaces.

Site Access, Roads, Fencing, and Security

As depicted in Figure 4, access to the site would be via a private access and utility easement along Rainbow Way which also provide access to the Fort Sage Substation. Unpaved access roads would be constructed within the solar facility and around the perimeter of the site.

The perimeter of the solar site would be enclosed by a 7-foot-high chain link fence that may be topped with a 1-foot barbed wire section. Access into the site would be controlled (authorized personnel only) by employing swinging or rolling chain link gates. Select gates would be automated to facilitate emergency access for fire department vehicles.

2.3 FABRICATION AND CONSTRUCTION

This section summarizes the fabrication and construction for the Project.

2.3.1 Preconstruction Site Drainage Characteristics

Most of the Project site would be drained by sheet flow to perpetuate the existing flow patterns through the site. Appropriate drainage features will be incorporated into the design of the facility. The site is classified as an "area of minimal flood hazard" and is not within the 100-year flood event zone. Onsite and offsite drainage would be coordinated with Washoe County Engineering and Capital Projects Division.

2.3.2 Clearing, Grubbing, and Grading

Only limited grading for internal access roads is expected to be required because of the low impact development (LID) approach and nearly flat terrain. The project site has a slope of less than five (5%) percent; thus, no grading would be required for PV power blocks.

The NVSolarWRX project will be constructed in areas that have been historically plowed and disturbed and all vegetation removed in the past. Mowing and management of existing vegetation will take place prior to construction and during operations.

Interconnection Facilities will be placed within an area of permanent disturbance associated with existing access and utility easements which will include the placement of Gen-Tie pole structure foundations, and minor road grading to maintain Rainbow Way to meet roadway standards necessary for safe travel and construction. Temporary disturbance would result from pole construction work areas at each Gen-Tie pole sites along Rainbow Way easement.

2.3.3 Assembly and Construction

Substation Construction

The substation would be constructed by an engineering, procurement, and construction (EPC) contractor selected by NSW in accordance with its Engineering, Procurement, and Construction (EPC) contract specifications. The substation would occupy an area of approximately 15 acres and would be graded flat and level. Four to 6 inches of gravel would be installed on the entire area to keep down dust and mud and make for easier housekeeping. Precast or cast in place concrete foundations would be built for the substation equipment and structures.

Foundations would be drilled pier or spread footing. Foundation type and size would be determined during the detailed engineering phase. The substation would be enclosed with a security fence and would be within the Solar Field Area.

Gen-Tie Line Construction

The Gen-tie Line would be constructed by a contractor selected by SBS and/or NSW in accordance with their Engineering, Procurement, and Construction (EPC) contract specifications. Gen-Tie Line construction would generally follow the sequence outlined below, but may vary depending on final engineering designs:

- Contractor mobilization of equipment and personnel

- Staging yard preparation
- Access road (Rainbow Way) maintenance and site preparation
- Foundation construction and anchor installation
    - The Gen-Tie Line would typically consist of drilled pier reinforced concrete foundations. No guys or anchors would be installed on the Gen-Tie.
- Assembly and erection of tubular steel poles for the Gen-Tie Line
- Wire stringing and sagging
- Testing and commissioning
- Cleanup and restoration

Construction would require heavy equipment including, but not limited to, pick-up trucks, water trucks, haul trucks, bucket trucks, bulldozers, graders, compactors, backhoe, excavator, drill rig, concrete trucks, cranes, puller and tensioner, reel trailer, splice trailer, and air compressors. Helicopters may also be utilized to support wire stringing operations.

Battery Energy Storage System (BESS) Construction

The BESS would be constructed by a contractor selected by NSW in accordance with its EPC contract specifications. The BESS would occupy an area of approximately 6 acres within the Project Substation footprint and would be graded flat and level and gravel placed and compacted. Precast or cast in place concrete foundations would be built for the BESS equipment and container/structures. Foundation type and size would be determined during the detailed engineering phase. The BESS would be enclosed with a security fence, within the Solar Field Area.

Tracker Modules Installation

The tracking system components would arrive on site, at an estimated rate of approximately 40 to 50 MW per month, to be assembled and installed at the site. PV modules would arrive on site and be placed in a staging area inside shipping containers. Modules would be distributed out to the blocks and put in place manually and secured to the tracker per vendor specifications and approved engineering plans. Each tracker would

be populated with modules, wired in series, to create strings, and connected to a DC combiner box, which would deliver DC power to the block's inverter station.

Laydown Areas, Staging Areas, Work Areas, and Stringing Sites

The laydown area would be near the main site entrance and would have the contractor site trailers/offices as well as fabrication areas, worker break area, sanitation and parking, material staging area, and storage (CONEX) boxes. This area would cover approximately 5 to 7 acres. Temporary power for the main laydown area would be provided by temporary mobile generators. Potable water for drinking and sanitation would be trucked in as needed from an outside source. Secondary materials staging/laydown areas may be located closer to work areas and would be moved periodically as the site builds out.

The Gen-Tie and Service Line would have work areas around each structure location which may require grading and vegetation removal for various construction activities. Stringing sites would support required equipment to perform wire stringing and sagging operations.

2.3.4 RESTORATION

The permanent easement and temporary use areas will be restored. All construction material and debris will be removed and disposed of at appropriate permitted landfills. All work areas will be graded and restored to as close to preconstruction contours as is feasible. EPC contractor will prepare and implement a postconstruction erosion control and Rainbow Way easement restoration plan.

2.3.5 Design and Construction Schedule

Construction of the NVSolarWRX Project will potentially begin in Summer of 2028 and may continue through Fall of 2029, depending on interconnection approvals. If sensitive environmental resources such as nesting birds are encountered in preconstruction surveys or during construction, construction scheduling in those identified portions of the project property or Gen-Tie Line corridor on Rainbow Way may be modified to prevent impacts to

sensitive species or sensitive habitat. Construction is expected to be conducted 10 hours per day, 6 days per week, depending on the schedule for the phases of construction.

Typical construction work schedules are expected to be from 7:00 a.m. to 5:00 p.m., Monday through Saturday, which is within allowed hours of exemption from local noise ordinance restrictions (Washoe County) for construction activity between 7:00 a.m. and 7:00 p.m., except Sundays and federal holidays.

2.3.6 Construction Sequencing

NSW expects to commence onsite construction as early as Summer 2028. The construction period is estimated to last approximately 7 months, contingent on several factors including timely obtention of an interconnection agreement, weather, pauses needed to mitigate potential impacts identified in this assessment, etc. The engineering process would commence before starting construction and is divided between the basic design phase and detail design phase. During the basic design phase, key information drawings and technical specifications would be developed. The RFP for the Engineering, Procurement and Construction (EPC) Contractor would be developed and issued at the stage as well. At the detail design phase, the EPC contract would be executed and the detail drawings and specifications for all equipment would be completed. Procurement of long-lead equipment would be conducted before starting construction.

Four phases of construction are planned:

1. **Grading/Temporary Construction Facilities**. Grading the pad for the project substation and establishing temporary construction facilities associated with the project substation. Grading of the access roads (site internal and external) for the solar photovoltaic facility and establishment of temporary construction facilities associated with the solar photovoltaic facility.
2. **Solar Field Construction**. Installing structural poles and trackers, mounting of panels, electrical system, inverters, and access driveways.

3. **Project Substation**. Installing BESS, 34.5-345 kV step-up transformer and 34.5 kV Capacitor Banks as required.
4. **Gen-Tie, and Ft Sage Substation**. Constructing the 345 kV Gen-Tie and improvements to the NV energy Ft Sage Substation.

The construction stage would commence with site mobilization. Substation clearing and grading work would last for approximately 1 month or as required to support Project schedule. Piling work would then commence. Following normal installation processes for similar PV plants, the mounting structure would first be installed. Next, the modules would be installed and connected to each other in series as a string. The solar generation facility would be installed as a unit block concept. Construction of the project is expected to last for approximately 7 months including its commissioning and expected to commence between 2028 Q2 and 2029 Q3. Construction of the BESS would proceed concurrent with the PV system. All components of the plant would be commissioned separately. Upon completion of conventional commissioning, a "Performance and Acceptance" test would be performed. The following temporary construction facilities would be needed:

- Full-length trailer offices or equivalent
- Parking for construction worker vehicles
- Construction equipment parking
- Fueling area (diesel and gas)
- Chemical toilets
- Holding tanks and/or temporary septic system
- Tool sheds/containers
- Covered assembly area
- Solar field equipment laydown area
- Diesel power generator(s)

Construction materials, such as concrete, pipe, wire and cable, fuels, reinforcing steel, and small tools and consumables, would be delivered to the site by truck. Initial grading work on the substation and access roads would include the use of excavators, graders, dump

trucks, and end loaders, in addition to support pickups, water trucks, and cranes. It is anticipated that the following equipment would be required:

- Scraper(s)
- Concrete truck(s)
- Motor grader(s)
- Backhoe/loader(s)
- Excavator(s)
- Truck-mounted crane(s)
- Dozer(s)
- Grader-all(s)
- Dump truck(s)
- Flatbed truck(s) for pre-cast foundations
- Pad drum vibrato roller(s)
- Trencher(s)
- Water truck(s)
- Pile driver(s)
- Lightweight truck(s).

2.3.7 Construction Staff

The workforce needed for the Project would vary during construction. The peak personnel during construction is expected to be around 200 people, with average manpower of approximately 150 per month. Table 3 depicts the anticipated construction workforce for the duration of construction.

Table 3. Estimated Personnel During Construction

Task	April 2028	May 2028	June 2028	July 2028	Aug 2028	Sept 2028	Oct 2028
Engineering/ Management	5	5	5	5	5	5	5
Electrical	70	70	70	60	40	40	30
Racking	60	60	60	50	50	60	60
Civil	10	10	10	15	15	20	20
Post Installation	40	40	40	20	20	30	30
Fencing	10	15	15	15	10	25	25
Total	195	200	200	165	140	180	170

2.3.8 Construction Waste Management

During construction, the primary waste generated would be solid non-hazardous waste. However, some non-hazardous liquid waste and hazardous waste (solid and liquid) would also be generated. All the waste generated by the Project would be at the Project site. The types of waste potentially generated during construction are described in the following discussion.

Non-Hazardous Solid Waste/Wastewater

Project construction could potentially generate the following non-hazardous waste streams:

- Paper, Wood, Glass, and Plastics. These wastes are typically generated from packing materials, waste lumber, insulation, and empty non-hazardous chemical containers. These wastes would be recycled to the extent practical. Waste that cannot be recycled would be disposed of weekly at an appropriately licensed landfill. Onsite, the waste would be placed in dumpsters.
- Metal. Metal wastes that include steel (from welding and cutting operations, packing materials, and empty non-hazardous chemical containers) and aluminum waste

(from packing materials and electrical wiring) would be generated during construction. Metal waste would be recycled where practical and non-recyclable waste would be deposited in an appropriately licensed landfill.

Wastewater

During construction, wastewater would be collected in self-contained systems that would be pumped and disposed of in accordance with local requirements. Wastewater generated during construction would include sanitary waste and equipment wash-down water. These waters may be classified as hazardous or non-hazardous depending on their chemical quality and would be handled and disposed of in accordance with applicable laws.

Hazardous Waste

Most of the hazardous waste generated during construction would consist of lubricants, oily rags, and solvents. Some hazardous solid waste, such as welding materials and dried paint, may also be generated during construction. In the event there are spills at the site, they will be cleaned-up and contaminated soil waste may be generated. Spill cleanup kits would be available on construction vehicles so that spills or leaks of vehicle fluids could be quickly cleaned up for proper disposal.

The quantity of hazardous waste is expected to be minimal. Wastewater generated during construction could also be identified as hazardous, based on sampling and testing results.

2.3.9 Erosion and Sediment Control Measures

Due to the removal or disturbance of soil and vegetation during construction, appropriate water erosion and dust-control measures would be required to minimize dust and sediment load to water bodies.

Water Erosion Control Measures

The Project would implement best management practices (BMPs) erosion-control measures to control stormwater runoff. Site-specific BMPs would be implemented by the

contractor in compliance with regulations and permit conditions. As appropriate, the Project would implement the following practices for temporary and final erosion control:

- Monitor the weather using National Weather Service reports during construction to track conditions and alert crews to the onset of rainfall events.
- Preserve existing vegetation where feasible. Conduct clearing and grading only in areas necessary for Project activities and equipment traffic. Install temporary fencing or signage prior to construction along the boundaries of the construction zone to clearly mark this zone, preventing vehicles or personnel from straying onto adjacent offsite habitat.
- Sequence construction activities with the installation of erosion control and sediment control measures. Arrange the construction schedule as much as practicable to leave existing vegetation undisturbed until grading begins.
- Stabilize non-active areas as soon as feasible on those portions of the Project site where construction has temporarily or permanently ceased.
- Place covers over stockpiles prior to forecasted storm events and during windy conditions as necessary to prevent erosion of stockpiles. Place sediment controls (such as fiber rolls, straw bales, silt fencing) around the perimeter of stockpiled materials to control sediment runoff.
- Maintain sufficient erosion control materials onsite to allow implementation of BMPs. This includes implementation requirements for active areas and non-active areas that require deployment before the onset of rain.
- Promptly repair and reapply controls according to BMPs in areas where erosion is evident.

Wind Erosion Control Measures

The Project would implement the following practices for wind erosion control:

- Minimize vegetation removal and grading to the extent practicable.
- Apply water or dust palliative to disturbed soil areas of the Project site to control dust and maintain optimum moisture levels for compaction as needed. Apply the water

using water trucks. Minimize water application rates as necessary to prevent runoff and ponding.

- During windy conditions forecast or actual wind conditions of approximately 25 miles per hour or greater, apply dust control to haul roads to adequately control wind erosion. Cover exposed stockpiled material areas.
- Temporarily suspend excavation and grading during periods of high winds when dust cannot be reasonably controlled.
- Cover all trucks hauling soil and other loose material or maintain at least 2 feet of freeboard.

2.4 OPERATION AND MAINTENANCE

This section summarizes the O&M for the Project.

2.4.1 Facility Operation

O&M activities would be managed and performed by a team of highly qualified technicians. Five new solar technicians are expected to be hired to help manage the NVSolarWRX facility. The NVSolarWRX Solar plant would be monitored and controlled from regional operations center off site.

Daily operation of the solar plant would begin when there is sufficient sunlight to begin operation of the single-axis tracking solar arrays. Operators work rotating 10-hour shifts. Operators will be on site to complete maintenance requirements.

2.4.2 Maintenance

Long-term maintenance schedules would be developed to include periodic maintenance and equipment replacement in accordance with manufacturer recommendations. Solar panels may be warrantied for 20 to 25 years and are expected to have a life of 30 to 35 years. Moving parts, such as tracker motors, motorized circuit breakers and disconnects, and inverter ventilation equipment, would be serviced on a regular basis, and unscheduled maintenance would be conducted, as necessary.

Due to the efficiencies gained by adopting solar panel technology, the cost and time for O&M is expected to be minimal compared to that of conventional power plants.

2.4.3 Waste Management

The primary waste generated at the Project site during operations would be non-hazardous solid waste. However, varying quantities of liquid non-hazardous waste and solid and liquid hazardous waste would also be generated. The types of wastes and their estimated quantities are discussed in the following subsections.

Non-Hazardous Solid Waste

The Project would produce non-hazardous waste, including rags, broken metal, and machine parts, defective or broken electrical materials, empty containers, typical refuse generated by workers and small office operations, and other miscellaneous solid wastes. Large metal parts would be recycled. Other non-hazardous wastes would be disposed of in an appropriately licensed landfill.

Only limited hazardous materials are associated with the operation of the Project; however, during maintenance activities, there is potential for a vehicle petroleum spill. Spill cleanup kits would be available on equipment so that spills or leaks of vehicle fluids could be quickly cleaned up for proper disposal. Material storage yards, and access roads would be kept in an orderly condition throughout the construction period. Refuse and trash would be removed from the sites and disposed of in an approved manner. Oils or chemicals would be hauled to an approved site for disposal.

Non-Hazardous Wastewater

During operation, routine annual panel cleaning may be required depending upon local conditions and occasional rainfall. If the panels become soiled over time, water would be used to wash dust and dirt off each solar panel for a cleaning. This water would be non-hazardous and would be allowed to flow onto the ground.

Hazardous Waste

Limited quantities of hazardous materials would be used onsite for O&M that may require disposal as hazardous waste. These materials would include oils, diesel fuel, lubricants, solvents, janitorial supplies, office supplies, laboratory supplies, paint, degreasers, herbicides, pesticides, air conditioning fluids, gasoline, hydraulic fluid, propane, and welding rods. These materials would generally be used in small quantities.

Any hazardous materials would be stored offsite. Due to the small quantities involved, spills could be cleaned up without resulting in any considerable environmental consequences.

The PV panels and inverters produce no waste during operation; however, the PV panels may include solid materials that are considered hazardous. As such materials are in a solid and non-leachable state, broken PV panels would not be a source of pollution to stormwater.

2.4.4 Decommissioning

NSW would operate the NVSolarWRX Project for the foreseeable future. However, the facilities and equipment to be located on the project property are subject to finite lifecycle. When the Project ultimately is decommissioned, the PV panels, support structures, and electrical equipment would be removed in accordance with a decommissioning plan prepared at that time and agreements with the property owners. The PV panels and inverters produce no waste during operation, and the panels and related equipment are solid and in a non-leachable state. Thus, no ground decontamination or remediation would be required. All panels removed from the site would be returned to the manufacturer or trucked offsite to an appropriate disposal facility.

2.4.5 Health and Safety

The health and safety of employees and contractors is a high priority. All employees and contractors would be required to adhere to the appropriate health and safety plans and emergency response plans. All construction and operation contractors would be required to operate under a health and safety program that meets industry standards.

An operational Environmental Health and Safety Plan (EHS Plan) would be prepared for the proposed solar facility and gen-tie line. The EHS Plan would outline all Project activities, identify all hazardous substances and chemicals used at the site, and ensure compliance with Occupational Safety and Health Administration (OSHA) Standards, the Nevada Division of Industrial Relations requirements, and all other local, state, and federal environmental and regulatory requirements. The EHS Plan would identify site-specific safety control measures, site health and safety roles and responsibilities, speed limits, and site safety hazards and controls.

2.4.6 Site Security and Lighting

The Project site would be secured with 7-foot chain-link fencing that may be topped with 1-foot of barbed wire. Lighting would be provided at the control building, within the project substation, and at the main plant entrance. A perimeter security system may also be installed, as necessary.

2.5 ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED CONSIDERATION

Potential alternatives for the proposed NVSolarWRX Project were evaluated to determine whether they could substantially achieve the Project goals and objectives to be considered feasible and appropriate for further consideration. This section describes the evaluation criteria, interconnection options, and technologies eliminated because they did not meet the Project objectives and/or did not reduce environmental consequences compared to the proposed action.

2.5.1 Facility Location Criteria

The primary objective of NSW was to locate the solar facility in northern Nevada. Several criteria were developed and used in evaluating appropriate sites:

- Adequate solar irradiation
- Proximity to a high-capacity substation with access to the NV Energy grid

- Adequate transmission capacity to convey the electrical output of the Project
- Minimal environmental concerns
- Relatively flat site to minimize the need for site grading
- Existing access to accommodate construction workforce needs
- Land parcel large enough to accommodate a utility scale solar facility
- Access to nearby workforce sufficient to support Project construction

The remote location of the Project site with respect to population centers minimizes the potential for impacts affecting the local population. Noise, visual, and traffic impacts are all minimized by the Project's remote location.

2.5.2 Gen-Tie Power Line Criteria

Another key objective was to locate the PV facility and the gen-tie line in an area with established utility easements/ROWs, allowing interconnection to the electrical grid in a direct path to minimize gen-tie line losses and costs and avoiding a protracted right-of-way acquisition process. The Project site meets these criteria.

2.5.3 Alternatives Considered and Eliminated

Alternative gen-tie route options and technologies were considered and eliminated are summarized in this section.

Alternative Gen-Tie Routes

The Project site is located approximately four miles northeast of NV Energy's Fort Sage Substation. Location of the solar facility substation and gen-tie line are constrained by, distances required to use alternative easements/ROWs, avoiding conflicts with existing transmission infrastructure in the vicinity, and by the ability to obtain a right-of-way for the gen-tie line.

A possible alternative gen-tie route was considered along Honey Lake Way that would surpass the junction with Anaho Rd to then connect to the NV Energy’s Fort Sage Substation. However, use of this alternate gen-tie path would require amendments to the Truckee Meadows Regional Planning Agency’s Regional Utility Corridors. Such modifications to

existing plans would only be deemed necessary in the invent that NVSolarWRX is unable to co-develop the gen-tie corridor with previously permitted projects. In which case, permission to construct the alternative gen-tie would be sought in a subsequent application. Any property or work outside the limits of provided easements, must be acquired by the Contractor (RTC, 2016).

Alternative Technologies

The NVSolarWRX Project is designed to use crystalline silicon or thin-film PV technology mounted on single-axis tracker racking. Other solar technologies considered by NSW for the Project included concentrating PV and solar thermal technologies. The water demand is significantly greater for solar thermal technology and therefore presents greater environmental concerns. Crystalline silicon and thin film are commercially proven technologies which have already been shown to be viable by other solar projects in the Honey Lake Valley.

NSW determined that using crystalline silicon or thin film PV solar panels is the preferred technology for this Project given the comparatively low water requirements, and reliable, proven technology. Additionally, the alternative technologies mentioned would result in an increased potential for environmental impacts. Concentrating solar would have greater impacts on visual and biological resources and solar thermal would increase water use. Therefore, other alternative solar technologies were eliminated from further consideration.

3.0 EXISTING SETTING, ENVIRONMENTAL CONSEQUENCES, AND MITIGATION MEASURES

The proposed Project site would be in the Honey Lake Valley approximately 11 miles west of Pyramid Lake and 40 miles north of Reno in Washoe County, Nevada.

The following resources are analyzed in this EA:

- Geology, Soils and Paleontology, Section 3.1
- Water Resources, Section 3.2
- Air Quality and Climate, Section 3.3
- Biological Resources, Section 3.4
- Cultural Resources, Section 3.5
- Land Use Section, 3.6
- Transportation, Section 3.7
- Visual Resources, Section 3.8
- Noise, Section 3.9
- Waste Management and Hazardous Materials, Section 3.10
- Socioeconomics, Section 3.11

3.1 GEOLOGY, SOILS, AND PALEONTOLOGY

This section describes the geological, soils, and paleontological resources in the area, the impacts of the proposed Project on these resources, and the BMPs/mitigation measures designed to reduce these impacts.

3.1.1 Existing Setting

The NVSolarWRX Project property is in the northwestern corner of Nevada within Honey Lake Valley, a structural basin bounded to the north and east by the Terraced Hills Mountains and to the south by the Virginia Mountains. This basin is transitional between the Basin and Range physiographic province to the east and the Sierra Nevada to the west. The site is generally flat with mild undulating topography fluctuating between elevations of 3,991 and 3,998 feet above mean sea level (MSL).

The present topography of the basin is due primarily to a combination of extensional normal faulting and Quaternary-age basinal sedimentation. During the Pleistocene glacial periods, Honey Lake Valley, and many of the valleys in the surrounding basins were submerged by lakes. These lakes have since evaporated and left behind extensive, flat playas. Generally, the sediment at the site is composed of silts and clays derived from the Pleistocene lakes, Quaternary-aged eolian sand dunes, talus, and stream deposits. The surface soils were observed to be a hard-packed, light brown, moderately plastic silt. According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service's (NRCS) Web Soil Survey (WSS) indicates soils at and around the Site primarily consist of very fine sandy loam to silty clay, 0-2 percent slopes (USDA, 2024).

A paleontological records search identified two locations in the vicinity of the Project site, Calneva Lake I and Calneva Lake II, less than one mile northwest of the proposed NVSolarWRX Project property. Among the vertebrate fossil remains recovered from the Calneva Lake localities are a calcaneum fragment from a Rancholabrean-aged (240,000 years to 11,000 years old) cricetid (ID: 143241), a kind of small rodent in the Cricetidae family such as a hamster, vole, lemming, gerbil, or rat or mouse; and an unspecified bone fragment from another mammal species of Rancholabrean age (ID: 143242; UCMP 2020).

Nine additional localities were identified associated with Lake Lahontan sediments similar to those underlying the proposed project property, all of which have yielded vertebrate remains. These include the Amedee, Honey Lake Deer, Long Valley, and multiple Alturas Interconnection Project Localities. The Long Valley locality is found south of Herlong approximately 6.5 miles west of the proposed BESS/PSES project property and has yielded the remains of an extinct mustelid (badger; McLeod 2018; Navient 2019). The Amedee locality roughly 12.5 miles northwest of the proposed BESS/PSES project property yielded ulna and radius fragments (ID: 83878) of a Rancholabrean Western Camel (Camelops hesternus). The Honey Lake Deer locality roughly 18 miles northwest of the proposed BESS/PSES project property yielded the remains of a Blancan-aged (4,750,000 to 1,806,000 years BP) American mountain deer (Odocoileus lucasi) including the fore and hind limb elements, pelvis, and scapula (ID: 170137; UCMP 2020).

Among the fossil remains recovered from Lake Lahontan sediments of the Alturas Interconnection Project localities are a penultimate phalanx (ID: 174934) and carpal fragment (ID: 174935) of a Blancan horse (Plesippus sp.); a vertebrae (ID: 174952) of a Rancholabrean fish (Oncorhynchus sp.); a thoracic vertebra (ID: 174956) of a Rancholabrean cotton tail rabbit (Sylvilagus sp.); the left calcaneum (ID: 174957) of a Rancholabrean hare (Lepus sp.); and a maxilla fragment (ID: 174958) of a Rancholabrean ray-finned fish (Chasmistes sp.) (UCMP 2020). Significant fossils have also been recovered from the Secret Valley locality approximately 35 miles northwest of the proposed BESS/PSES project property, including 78 specimens of mammals such as extinct species of camel, bison, coyote, horse, and mastodon. Finally, significant vertebrate fossils have been recovered from the Ravendale locality 66 miles northwest of the proposed BESS/PSES project property, including 180 specimens of mostly extinct fish species (McLeod 2018; Navient 2019).

Paleontological resources occur in geologic units (e.g., formations or members). The probability for finding significant fossils at a given location can be estimated based on previous records of fossils recovered from the geologic units present in and/or adjacent to it. The geological setting and the number of known fossil localities help to estimate a location's paleontological sensitivity. As noted above, the treatment of paleontological

resources on non-federal lands usually follows the SVP Standard Guidelines for the Assessment and Mitigation of Adverse Impacts to Non-renewable Paleontological Resources guidance from the Society for Vertebrate Paleontology (2010). Treatment typically consists of identification, assessment, and mitigation for potential impacts to significant paleontological resources.

The SVP defines four levels of paleontological sensitivity: High, Low, Undetermined, and No Potential. High Potential geologic units are those from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered. These are regarded as having high potential to contain additional significant paleontological resources. Low Potential geologic units are those that are poorly represented by fossil specimens in institutional collections, or that are known to preserve fossils only in rare circumstances. Undetermined Potential geologic units are those for which little or no information is available concerning their paleontological content, geologic age, and depositional history. No Potential geologic units such as high-grade metamorphic rocks (e.g., gneisses and schists) and plutonic igneous rocks (e.g. granites and diorites) are those that would not preserve fossil resources under any circumstances (SVP 2010).

The proposed BESS/PSES project property is underlain by Early-to-Late Holocene aeolian, fluvial, and lacustrine deposits (Qhe) derived primarily from Lake Lahontan sediments (Adams et al. 2008; Meyer 2013; Grose et al. 2014). These geologic units have yielded an extensive catalog of vertebrate remains which are considered important paleontological resources. The fossil record for Lake Lahontan sediments indicates that the proposed BESS/PSES project property has variable sensitivity for paleontological resources ranging from low to high and increasing with depth. The precise depth that high sensitivity Early Holocene sediments are reached is not known, though significant fossils have been identified in similar lake deposits from depths as shallow as 5-10 feet below the ground surface (Jefferson 2003).

3.1.2 Environmental Consequences

This section summarizes potential geologic and soil hazards or constraints on the proposed solar facility, gen-tie line, and access road.

Soils

The erosion susceptibility of the soils in Honey Lake Valley is low. Soils disturbed by grading, excavation, and construction would have a higher potential for erosion by wind and water. Grading of the solar field is minimal due to the low impact construction methodology which avoids grading. Grading will be restricted to project internal and external access roads which are anticipated to include cuts and fills that are not expected to exceed 24 inches. Some potential for soil erosion exists from the proposed solar field site, due to soil disturbance and removal of vegetation during installation of piles. The Project would use BMPs for soil protection thereby minimizing the contribution to cumulative impacts. In addition, a fugitive dust plan would be developed with mitigation measures to reduce the potential for fugitive dust.

Faulting

The nearest mapped fault is a latest Quaternary-aged (< 15,000 years old) fault trending north-south approximately 0.4 miles north of the project site. It is calculated that, on average, an earthquake of Magnitude 5.3 to 5.4 would be expected to occur within 20 miles of Reno approximately once in 30 seconds of strong shaking. The expected return period of rock accelerations greater than 0.5g at an average site in western Nevada associated with an earthquake of magnitude greater than 7.0 is on the order of 2,000 years. The project site is in the Basin and Range Physiographic Province, structurally characterized by high-angle extensional normal faults. Therefore, strong ground shaking associated with earthquakes should be expected during the project's life.

Paleontological Resources

Background research indicated that the project property is underlain by Quaternary-aged eolian sand dunes, talus, and stream deposits derived from the Pleistocene Lake sediments. These geologic units have yielded an extensive catalog of Blancan and Rancholabrean-aged vertebrate remains which are considered important paleontological

resources. However, current Project construction plans do not call for excavation or grading to depths that would disturb these units.

3.1.3 Mitigation Measures

The project would be constructed to meet the safety standards listed in the Uniform Building Code. Best Management Practices (BMPs) for control of erosion would be executed on site as outlined in the Stormwater Pollution Prevention Plan (SWPPP). Grading and erosion control plans would be prepared in accordance with the Washoe County's engineer requirements for improvement plans. A detailed geotechnical survey will be completed, and grading, soil compaction, and structural design would be implemented in accordance with the recommendations of the geotechnical report during the final design phase of the BESS/PSES facility. No significant impacts are anticipated.

3.2 WATER RESOURCES

This section analyzes the potential impacts on water quality and hydrologic resources that may result from the proposed NVSolarWRX Project. Hydrologic resources include groundwater, surface water, and wetlands (where present). Groundwater quality and the issuance of permits for the use of both groundwater and surface water are overseen by the State Engineer under authority granted by the Nevada Revised Statutes 533 and 534. Wetlands are under jurisdiction of the U.S. Army Corps of Engineers (USACE). This section describes the water resources in the area, the impacts of the proposed Project on these resources, and the BMPs/mitigation measures designed to reduce potential impacts to a level of non-significance.

3.2.1 Existing Setting

The Clean Water Act (CWA) (33 USC 1251-1376), is the federal legislation that governs water quality. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." The Nevada Division of Environmental Protection (NDEP) has primary authority under this Act as granted by the U.S. Environmental Protection Agency (USEPA), which has delegated responsibility to the owners, managers, and operators of public water systems (NDEP, 2024).

Groundwater

Holocene sedimentary deposits, Pleistocene Lake and near-shore deposits, and Pleistocene and Plio-Pleistocene volcanic rocks comprise the Honey Lake Valley Groundwater Basin aquifer system. The major sources of groundwater recharge in the region are direct infiltration of precipitation in upland areas and infiltration of streamflow in alluvial-fan areas accounting for approximately 80 percent of total recharge. The remaining 20 percent consists of infiltration of surface water and irrigation flow on the valley floor. The upland recharge areas consist of Plio-Pleistocene and Pleistocene basalt flows. Wells in the Honey Lake Basin produce between 20 and 2,500 gallons per minute (gpm), and range between 20 and 1,005 feet deep (California Department of Water Resources [DWR] 2004).

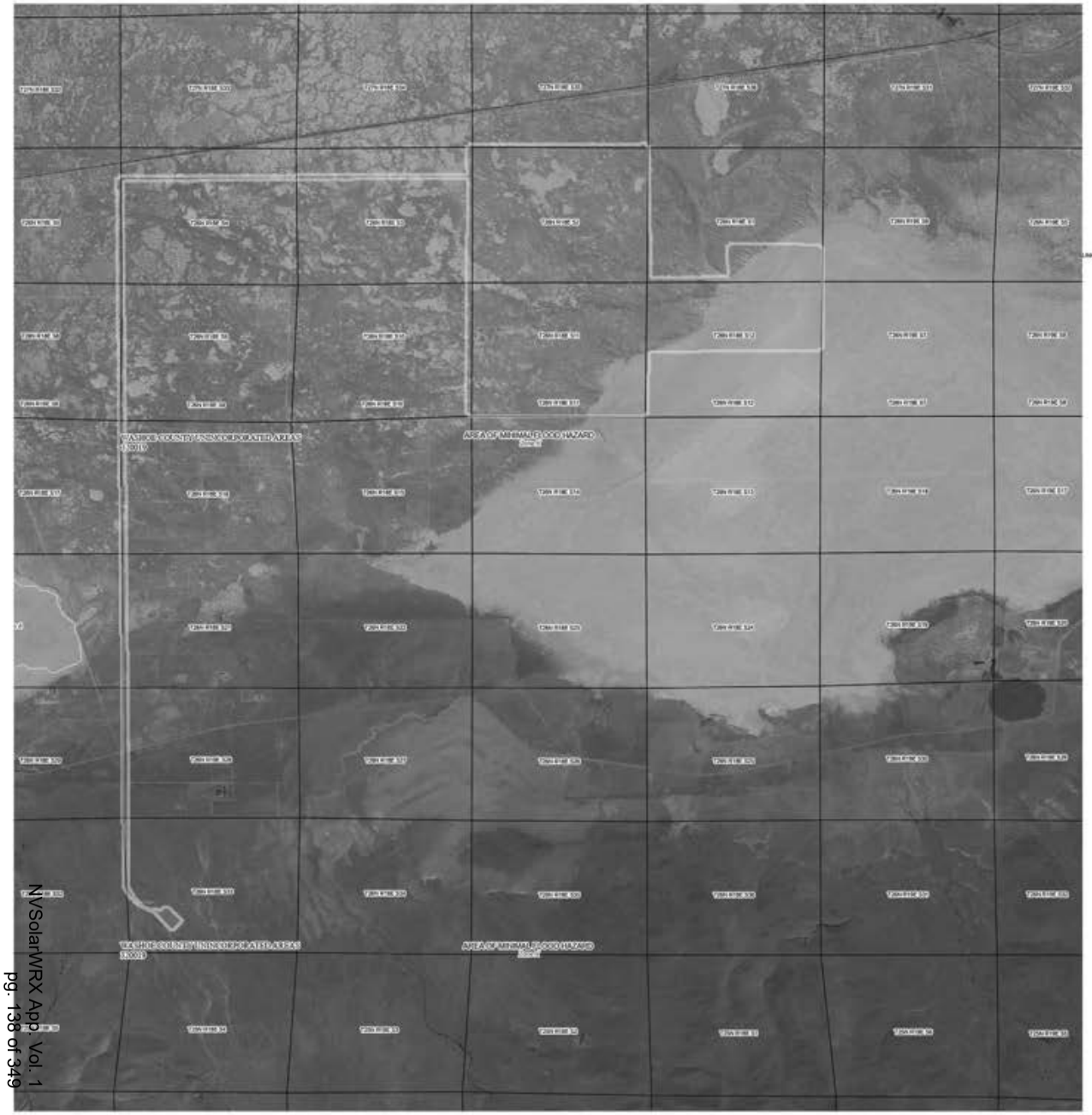
Well Log No.: 16116 lies within the northeastern site boundary and has a recorded static water level of approximately 40 feet below grade.

Surface Water

The presence of surface water resources in the Honey Lake Valley is very limited. Honey Lake Valley is part of the Basin Range Geomorphic Province that extends into California. The valley is bounded to the north and northeast by Plio-Pleistocene basalt of Antelope Mountain, Shaffer Mountain, and Amedee and Skedaddle Mountains, and the Modoc plateau. The valley is bounded on the southwest by Mesozoic granitic rocks of the Diamond Mountains of the Sierra Nevada Geomorphic Province. More than 40 streams flow from the Diamond, Fort Sage, and the Virginia mountains and the northern volcanic uplands. Most streams are intermittent.

Honey Lake is the most prominent surface feature in the basin with an average surface area of 47,000 acres. The lake fluctuates greatly in area and volume. It is likely that the flooding characteristic of the Honey Lake Valley basin exhibit shallow flash flooding over large areas (DWR 2004).

The project property is located within Honey Lake Valley, portions of the Honey Lake Valley have been designated as a special flood hazard area subject to inundation by the 100-year floodplain. The Project area is not within the 100-year floodplain (Federal Emergency Management Agency [FEMA] 2024). *Figure 5. Flood Zones in the Vicinity of the Project Property* shows the flood zones in the project area vicinity.



FLOOD HAZARD INFORMATION

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP
FOR DRAFT FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) Zone A, V, A99
- With BFE or Depth Zone AE, AO, AH, VE, AR
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
- Future Conditions 1% Annual Chance Flood Hazard Zone X
- Area with Reduced Flood Risk due to Levee See Notes Zone X
- Area with Flood Risk due to Levee Zone D

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard Zone X
- Effective LOMRs
- Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary

NOTES TO USERS

For information and questions about this Flood Insurance Rate Map (FIRM), available products associated with this FIRM, including historic versions, the current map date for each FIRM panel, how to order products, or the National Flood Insurance Program (NFIP) in general, please call the FEMA Map Information eXchange at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA Flood Map Service Center website at https://msc.fema.gov. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the website.

Communities annexing land on adjacent FIRM panels must obtain a current copy of the adjacent panel as well as the current FIRM Index. These may be ordered directly from the Flood Map Service Center at the number listed above.

For community and countywide map dates, refer to the Flood Insurance Study Report for this jurisdiction.

To determine if flood insurance is available in this community, contact your insurance agent or call the National Flood Insurance Program at 1-800-638-6620.

Basemap information shown on this FIRM was provided in digital format by USDA, Farm Services Agency (FSA). This information was derived from NAIP, dated April 15, 2016.

This map was exported from FEMA's National Flood Hazard Layer (NFHL) on 10/7/2020 3:31 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time. For additional information, please see the Flood Hazard Mapping Updates Overview Fact Sheet at https://www.fema.gov/media-library/assets/documents/115418.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards. This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date.

SCALE

Map Projection:
GCS, Geodetic Reference System (1980)
Vertical Datum: No elevation features on this FIRM
For information about the specific vertical datum for elevation features, datum conversions, or vertical monuments used to create this map, please see the Flood Insurance Study (FIS) Report for your community at https://msc.fema.gov

1 inch = 2,000 feet 1:24,000

0 1,000 2,000 4,000 6,000 8,000 Feet

N

0 210 420 840 1,260 1,680 Meters

FEMA

National Flood Insurance Program

NATIONAL FLOOD INSURANCE PROGRAM

FLOOD INSURANCE RATE MAP

PANEL 2125 OF 3435

Panel Contains:

COMMUNITY	NUMBER	PANEL
LASSEN COUNTY UNINCORPORATED AREAS	320018	2125
WASHOE COUNTY UNINCORPORATED AREAS	320019	2125

MAP NUMBER
32031C2125G
EFFECTIVE DATE
March 16, 2009

"Water of the United States," defined in 33 Code of Federal Regulations (CFR) 328.3(a) include:

1) The territorial seas, and water which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including waters which are subject to the ebb and flow of the tide;
2) Tributaries;
3) Lakes and ponds, and impoundments of jurisdictional waters; and
4) Adjacent wetlands.

Analysis of satellite imagery indicated small riverine features draining southeast to Dead Horse Lake. Narrow and shallow ephemeral drainage washes flow from south to north across the site. Though water does appear to flow during infrequent storm events. In the field, these features do not support any riparian vegetation and terminate at Dead Horse Lake. Indicators of surface hydrology appeared to support an ephemeral flow or inundation regime, however, no hydric soils, hydrophytic vegetation or hydrologic topography was observed. Therefore, no hydrological resources meeting the above criteria were found to be present on the project property or within the gen-tie corridor. (see: *Appendix B- Biological Assessment Report*). Since there is no connection of this flow to any river system, there is no applicable regulation under section 404 of the Clean Water Act. As the Honey Lake Valley is a closed basin in which surface water runoff from the surrounding mountains is directed to one of three dry lakes, a permit is not expected to be required for this project; however, a Jurisdictional Determination report was submitted to USACE for an official determination. The USACE is expected to agree with the findings that there are no permanent surface waters or wetlands exist on or near the Project area.

3.2.2 Environmental Consequences

The following subsections discuss the environmental consequences of the Project for groundwater and surface water.

Groundwater

The photovoltaic panels within the solar array area will be installed on the ground supported by a piling foundation system. The foundation system's support footings will be driven into the ground at a depth of 6-10' depending on soil conditions. The pile foundation system will allow the solar array area to go undisturbed and allow all surface areas under the photovoltaic panels be natural earth to allow stormwater percolation. The small amount of new impervious surfaces required for the proposed BESS/PSES project (i.e., small pedestal footings for the battery storage system, small foundations for ancillary equipment, and pilings to support the photovoltaic panels) would not inhibit continued infiltration of rainwater into the project property soils.

Activities associated with the construction and operation of the Project would not have impacts at depths exceeding 30 feet, and therefore would not intercept or impact the groundwater. Water necessary for construction and operation of the proposed utility facilities and the associated NVSolarWRX Project will be supplied from an off-site location to be brought on-site by truck. Water use during construction would be used primarily for dust control and would total approximately 100 acre-feet during the construction period. Water would principally be used during operation for occasional panel washing which is anticipated that panel washing may occur once a year depending on site conditions and rainfall.

Surface Water

Surface runoff in the BESS/PSES facility area typically infiltrates into the site soils inside the proposed perimeter fencing. Runoff of surface water outside of the perimeter fenced area of the BESS/PSES facility will be negligible or close to that which occurs under the existing conditions, due to on-site infiltration of stormwater. During a heavy precipitation event, sheet flows from the BESS/PSES facility area may reach the natural ground south of the perimeter fenced area and perc into the ground on adjoining acreage as did historically. Any runoff that may sheet flow beyond the perimeter fencing of the BESS/PSES area would enter the adjacent open range land parcel and would then infiltrate in the undeveloped area of the parcel, consistent with current practices. Increased soil disturbance would occur during construction of the Project, potentially resulting in increased levels of erosion, resulting in incrementally increased levels of sedimentation. Potential

impacts resulting from this increased erosion and sedimentation due to soil disturbance would be reduced using BMPs and mitigation measures.

3.2.3 Mitigation Measures

Standard storm water BMPs will be incorporated by NVSolarWRX Project construction contractors, such as erosion controls, soil barriers, sedimentation basins, site contouring, and others would be used during construction activities to minimize runoff of soils and associated contaminants. Erosion controls are used during construction to reduce the amount of soils disturbed and to prevent disturbed soils from entering runoff. Erosion controls can include both logistical practices, such as scheduling construction during seasons with the least potential for erosion (e.g., non-storm seasons), and sediment control practices. The combined effectiveness of the erosion and sediment control systems is not easily predicted or quantified (EPA, 2015). The proposed NVSolarWRX Project would be required to obtain coverage under a Construction General Permit to comply with Clean Water Act NPDES requirements, because the project footprint is greater than one (1+) acre. The NVSolarWRX Project, will require construction contractors to implement a SWPPP and associated BMPs.

Given the relatively flat topography of the BESS/PSES construction site, distance from surface waters, the minimal grading and excavation required for construction, soil disturbance footprint greater than one (1+) acre, and implementation of a SWPPP, construction of the proposed BESS/PSES facility would not violate any water quality standards or waste discharge requirements. During operations of the BESS/PSES facility, wastewater discharge would be expected to be minimal amounts of stormwater runoff generated during precipitation events. Given the nearly flat topography of the project property, and the minor amounts of impervious surfaces that the proposed BESS/PSES facility would create, precipitation would be expected to infiltrate or evaporate onsite more so than sheet flow over land and discharge offsite at substantial rates or volumes. Any runoff leaving the BESS/PSES facilities during operations would flow onto the adjoining open rangeland like previous historical storm events. Lithium-ion batteries would be fully

contained within the storage enclosures, and battery fluids or substances would not be susceptible to spills or release as runoff. If the BESS facility did have a spill it would be contained within the battery storage containers. Operation of the proposed BESS facility would not be expected to violate any water quality standards or waste discharge requirements. The proposed NVSolarWRX Project would have less than significant impacts on water quality standards and discharge requirements.

Spills associated with construction equipment, such as oil/fluid drips or gasoline/diesel spills during fueling, typically involve small volumes that can be effectively contained in the work area and cleaned up immediately. Other spills of fuels and lubricants from construction equipment would have a very low potential to occur and enter surface water, including during the rainy season, due to implementation of BMPs in the project specific SWPPP and assuming the following are included in the SWPPP:

- Equipment shall be inspected regularly (daily) during construction, and any leaks found shall be repaired immediately.
- Refueling of vehicles and equipment shall be in a designated, contained area.
- Drip pans shall be used under stationary equipment (e.g., diesel fuel generators), during refueling, and when equipment is maintained.
- Drip pans that are in use shall be covered during rainfall to prevent washout of pollutants; and
- Monitoring to verify that the BMPs are implemented and kept in good working order.

Construction activities associated with the proposed BESS/PSES project would not result in discharges that create pollution, contamination, or nuisance, or cause regulatory standards to be violated. Therefore, construction activities would have less than significant impacts on water quality.

3.3 AIR QUALITY AND CLIMATE

This section describes the impacts of the proposed NVSolarWRX Project on local and regional air quality. The primary factors that determine the air quality are the locations of air pollution sources, the type and magnitude of emissions, and the local meteorological conditions. The Federal Clean Air Act (CAA) and subsequent amendments have provided the authority and framework for USEPA regulation of air emission sources. As an enforcement tool, the CAA established National Ambient Air Quality Standards (NAAQS), which have historically applied to six criteria pollutants-sulfur dioxide (S02), carbon monoxide (CO), nitrogen dioxide (N02), particulate matter equal to or less than 10 microns in diameter (PM10), ozone (03), and lead (Pb) (see *Table 4: National Ambient Air Quality Standards*)

Table 4. National Ambient Air Quality Standards

Air Pollutant	Primary/ Secondary	Averaging Time	Units	NAAQS	Attainment Status
Ozone	both	8-hour	ppm	0.070	Unclassifiable/Attainment
Carbon monoxide (CO)	primary primary	8-hour 1-hour	ppm ppm	9 35	Attainment Attainment
Nitrogen dioxide (NO_2)	primary both	1-hour Annual	ppb ppb	100 53	Unclassifiable/Attainment
Sulfur dioxide (SO_2)	primary secondary	1-hour 3-hour	ppb ppm	75 .5	Unclassifiable/Attainment
Fine particulate matter ($PM_{2.5}$)	primary secondary both	Annual Annual 24-hour	µg/m^3 µg/m^3 µg/m^3	12 15 35	Unclassifiable/Attainment Unclassifiable/Attainment Unclassifiable/Attainment
Respirable particulate matter (PM_{10})	both	24-hour	µg/m^3	150	Attainment
Lead (Pb)	both	3-month	µg/m^3	0.15	Unclassifiable/Attainment

Source: EPA 2024

Geographic areas are designated as attainment, non-attainment, or unclassified for each of the six criteria pollutants with respect to the NAAQS. Currently, Washoe County meets all NAAQS (Federal Register Vol. 80, No. 235, December 8, 2015).

Currently there are no emission limits for so-called greenhouse gases (GHG), and no technically defensible methodology for predicting potential climate changes from GHG emissions. However, there are, and will continue to be, several efforts to address GHG emissions. Ongoing scientific research has identified the potential impacts on the global climate of anthropogenic (manmade) GHG emissions and changes in biological carbon sequestration due to land management activities. Through complex interactions on a regional and global scale, these GHG emissions and net losses of biological carbon sinks cause a net warming effect on the atmosphere, primarily by decreasing the amount of heat energy radiated by the earth back to space. Although GHG levels have varied for millennia, recent industrialization and burning of fossil carbon sources have caused carbon dioxide concentrations to increase dramatically and are likely to contribute to overall global climatic changes. Although it is expected that the proposed project would lead to a reduction in regional GHG emissions by offsetting traditional energy production systems, the net reduction in GHG emissions has not been quantified in the present assessment due to the lack of an applicable regulatory framework to guide such an analysis.

Sources of odor and air contaminants associated with a typical project consist of construction-related emissions (i.e., particulate matter from surface disturbance activities, such as grading and site preparation, and other short-term emissions from fuel combustion in equipment, including semi-trucks, trenchers, pavers, backhoes, and other construction equipment) and operational emissions (emissions produced in the course of operation after implementation of the completed project). Dust and fumes from increased traffic associated with construction can also reduce air quality. Presence of contaminants does not constitute an environmental or health risk unless minimum established thresholds are exceeded. However, because the proposed project is a renewable energy facility designed to be operated from off site, any emissions associated with operation and maintenance will be

minor and sporadic in nature. Therefore, the bulk of the analysis has been dedicated to the construction phase of the proposed Project.

3.3.1 Existing Setting

The Project area and surrounding region is located near a dry lakebed in the Honey Lake Valley, surrounded by desert mountain terrain. Washoe County maintains an arid climate year-round, with average temperatures ranging from a high of 95 degrees in July to a low of 42 degrees in December (The Weather Channel, 2024). Elevation in the vicinity of the Project area is approximately 4,000 feet above mean sea level (MSL), the highest elevations in the area included peaks of more than 7,000 feet above MSL in the Fort Sage Mountain Range. The elevation of the mountain ranges surrounding the Honey Lake Valley creates existing discernible air quality effects in the valley as the mountain ranges keep pollutants within the valley.

3.3.2 Environmental Consequences

Air emissions associated with the Project would occur primarily during construction and would be chiefly associated with fugitive dust during construction from ground disturbing activities include site preparation, pad construction and installation of the gen-tie line, as well as proportionally smaller amounts of emissions associated with engine exhaust from construction equipment and the transportation of goods and construction workers. Once the facility is operational relatively small contributions to air emissions would be generated from on-road travel of vehicles associated with worker commutes for maintenance activities and the potential limited use of an emergency diesel generator for the HVAC system in the event of a power outage.

Construction of the proposed NVSolarWRX Project is anticipated to begin in the second quarter of 2026 and would be completed by the third quarter of 2026 with the overall construction period, including commissioning and testing expected to last approximately 7 months (depending on outside factors). The construction phase consists of pre-construction Best Management Practices (BMPs) site preparation, including stormwater runoff containment systems; clearing driveway and foundation areas of existing vegetation, gravel,

etc.; compaction and the addition of gravel to driveway surface as needed; pour-in-place concrete footing and pad foundation installation; installation of subterranean conduit banks; delivery and placement of the battery enclosure to prepared foundation; installation of PCS, PDS, photovoltaic panels, and pad-mounted transformers; running conduit to existing utility poles; installation of safety features and security lighting; cleanup and demobilization. The system components are prefabricated. No onsite coating applications are needed for this equipment. Construction activities for the project would generate temporary air pollutant emissions and fugitive dust emissions (PM10 and PM2.5) from construction equipment used in activities such as minimal site preparation, portable engines, on-site heavy-duty construction vehicles, laying of foundations, and motor vehicles transporting construction workers. Exhaust emissions from construction activities would vary daily as construction activity levels change.

Fugitive particulate matter emissions (PM10, PM2.5) are the greatest pollutants of concern for a project's construction emissions as well as short-term increases in CO and NOx emissions associated with vehicle trips and construction equipment. However, the project site is not subject to any quantified thresholds for mobile sources as the region has been shown to be in attainment for all criteria pollutants. Despite this fact, BMPs would help to reduce any temporary issue of fugitive dust emissions from the proposed NVSolarWRX Project's construction activity. During operations, criteria pollutant emissions would be limited to those associated with vehicle traffic to and around the facility to perform maintenance on the solar arrays and battery systems.

Emissions during construction would be temporary and, based on comparison of analysis of similar projects in Nevada, would be less than de minimis and would result in no long-term impact on the existing ambient air quality. Similarly, operational emissions would be sporadic and limited in nature and are anticipated to constitute de minimis conditions with no potential to significantly impact regional air quality.

3.3.3 Mitigation Measures

The construction of the Project would temporarily cause fugitive dust related to grading and other construction activities. To comply with Washoe County dust control requirements, water would be used to control dust. Areas of higher erosion or poor soils may require application of a palliative dust reducing agent. The Project would implement the following BMPs for fugitive dust and wind erosion control:

- Minimize grading and vegetation removal, and limit surface disturbance during construction to the time just before PV module support structure installation.
- Limit vehicular speeds on non-paved roads (Washoe County ordinance speed limit is 25 mph.
- Apply water and/or palliatives (as allowed) to disturbed soil areas of the Project site to control dust and maintain optimum moisture levels for compaction, as needed.
- Apply the water using water trucks. Minimize water application rates, as necessary, to prevent runoff and ponding.
- During windy conditions (forecast or actual wind conditions of approximately 25 mph or greater), apply dust control measures to haul roads to adequately control wind erosion. Cover exposed stockpiled material areas, as necessary.
- Suspend excavation and grading during periods of high winds if substantial dust is generated by these activities.
- Cover all trucks hauling soil and other loose material or maintain at least 2 feet of freeboard.
- Gravel or other similar material would be used where dirt access roads intersect the paved roadways to prevent mud and dirt track-out. All paved roads would be kept clean of objectionable amounts of mud, dirt, or debris, as necessary, to prevent dust and particulates from being reintroduced (re-entrained) into the atmosphere.

3.4 BIOLOGICAL RESOURCES

The term "*biological resources*" refers to the flora and fauna found in the project area. The two categories "*vegetation*" (plants) and "*wildlife*" (animals) each have feature the subcategory "*special status species*", which refers to biological resources that have been designated for protection under applicable legislation (Endangered Species Act or the Nevada Administrative Codes NAC.501 and NAC.503).

UES prepared a Biological Assessment in November 2024 to determine to what extent the proposed action may affect any of the federally threatened, endangered, proposed, candidate, or special-status species, critical habitat, or other species protected by the federal, state, or local plans and regulations that may occur in the project area. This section summarizes the findings of the Biological Assessment and Special Status Plant Surveys, which has been provided in its entirety as Appendix B, by describing the biological resources in the area, the impacts of the proposed Project on these resources, and the any BMPs/mitigation measures that would be necessary to reduce these impacts.

3.4.1 Existing Setting

The following subsections describe existing conditions for vegetation, wildlife, and special status species on the Project Property and along the Gen-Tie Corridor.

Vegetation

Plant communities and habitat types were mapped on the NVSolarWRX Project property as well as the Gen-Tie Line corridor of Rainbow Way easement along with a focused survey for special-status plant species (included in the Biological Assessment). Qualified botanists performed initial presence/absence surveys and habitat type ground truthing in July of 2023 with additional site reconnaissance being carried out on October 24th, 2024. The surveys consisted of nine (9) person days of surveys, or approximately seventy (80) person hours. Surveys were conducted within the blooming periods for special status species determined to have potential to occur within the action area. Surveys were floristic in nature. The species observed in these studies can be seen in *Table 5: Plants Observed in the Project Action Area*. No special status plant species were observed within the action area.

Table 5. Plants Observed in the Project Area

Habitat Type	Scientific Name (Common Name)	Special Status
Intermountain Basins Greaswood Flat (IBGF)		
IBGF	*Atriplex confertifolia* (Shadscale)	No
IBGF	*Bromus tectorum* (Cheatgrass)	No
IBGF	*Ceratocephala testiculata* (Bur buttercup)	No
IBGF	*Distichlis spicata* (Saltgrass)	No
IBGF	*Elymus elymoides* (Squirreltail)	No
IBGF	*Grayia spinosa* (Hopsage)	No
IBGF	*Halogeton glomeratus* (Halogeton)	No
IBGF	*Krascheninnikovia lanata* (Winterfat)	No
IBGF	*Lepidium perfoliatum* (Clasping Pepperweed)	No
IBGF	*Neokochia americana* (Green Molly)	No
IBGF	*Sarcobatus vermiculatus* (Greasewood)	No
IBGF	*Sisymbrium altissimum* (Tumble Mustard)	No
Intermountain Basins Mixed Salt Desert Scrub (IBMSDS)		
IBMSDS	*Argemone munita* (Flatbud Pricklypoppy)	No
IBMSDS	*Artemisia tridentata* (Sagebrush)	No
IBMSDS	*Atriplex confertifolius* (Shadscale)	No
IBMSDS	*Bromus tectorum* (Cheatgrass)	No
IBMSDS	*Distichlis spicata* (Saltgrass)	No
IBMSDS	*Elymus cinereus* (Great Basin Wildrye)	No
IBMSDS	*Ericameria nauseosa* (Rubber Rabbitbrush)	No
IBMSDS	*Grayia spinosa* (Hopsage)	No
IBMSDS	*Halogeton glomeratus* (Halogeton)	No
IBMSDS	*Lepidium perfoliatum* (Clasping Pepperweed)	No
IBMSDS	*Matricaria descoidea* (Disc Mayweed)	No
IBMSDS	*Neokochia americana* (Green Molly)	No
IBMSDS	*Onopordum acanthium* (Scotch Thistle)	No
IBMSDS	*Prunus andersonii* (Desert Peach)	No
IBMSDS	*Sarcobatus vermiculatus* (Black Greasewood)	No

IBMSDS	*Sisymbrium altissimum* (Tumble Mustard)	No
IBMSDS	*Tetradymia glabrata* (Littleleaf Horsebrush)	No
IBMSDS	*Tragopogon dubius* (Salsify)	No
Invasive Annual and Biannual Forbland (IABF)		
IABF	*Bromus tectorum* (Cheatgrass)	No
IABF	*Elymus cinereus* (Great Basin Wildrye)	No
IABF	*Lepidium perfoliatum* (Clasping Pepperweed)	No
IABF	*Madia sp.* (Unknown Madia)	No
IABF	*Amsinckia tessellate* (Bristly Fiddleneck)	No
IABF	*Argemone munita* (Flatbud Pricklypoppy)	No
IABF	*Iva axillaris* (Poverty Weed)	No
IABF	*Erodium cicutarium* (Redstem Storksbill)	No
IABF	*Prunus andersonii* (Desert Peach)	No
IABF	*Salsola tragus* (Russian Thistle)	No
IABF	*Onopordum acanthium* (Scotch Thistle)	No
IABF	*Ericameria nauseosa* (Rubber Rabbitbrush)	No
IABF	*Verbascum Thapsus* (Wolly Mullein)	No
IABF	*Sisymbrium altissimum* (Tumble Mustard)	No
IABF	*Eriogonum baileyi* (Baliley's Buckwheat)	No
IABF	*Halogeton glomeratus* (Halogeton)	No
IABF	*Nicotiana attenuata* (Coyote Tobacco)	No
IABF	*Pleiacanthus spinosus* (Thorn Skeletonweed)	No

Wildlife

Special-status species lists from the USFWS (USFWS 2024), Nevada Division of Natural Heritage Program (NDNH), and Nevada Department of Wildlife (NDOW) were referenced to compile a master list of special-status and sensitive species that could potentially occur in the project action area. Special-status species that were considered include all federally listed threatened and endangered species, candidates for listing, species proposed for listing, species delisted within the last five years, species of concern. A special-status species was considered a potential inhabitant of the project action area if its known geographical distribution overlapped with the project area and its general habitat requirements (e.g.,

roosting, nesting, or foraging habitat; specific soil type; permanent water source) were present. A list of special-status species with the potential to occur was compiled along with their listing status represented in Table 6.

Table 6. Wildlife with Potential to Occur in Project Action Area

Scientific Name	Common Name	Nevada Protected Species
Pseudocopaeodes eunus obscurus	Carson wandering skipper	No
Danaus plexippus	Monarch butterfly	No
Aquila chrysaetos	Golden eagle	Nevada Wildlife Action Plan (WAP) Species of Concern (SOC)
Odocoileus hemionus	Mule deer	Protected Game Species
Antilocapra americana	Pronghorn antelope	Protected Game Species
Ovis canadensis spp.	Bighorn sheep	Protected Game Species
Centrocercus urophasianus	Greater sage-grouse	Protected Game Species
Athene cunicularia	Burrowing owl	WAP SOC

Migratory Birds

The Migratory Bird Treaty Act (MBTA) implements international treaties devised to protect migratory birds and any of their parts, eggs, and nests from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. As authorized by the MBTA, the USFWS issues permits to qualified applicants for the following types of activities: falconry, raptor propagation, scientific collecting, special purposes (rehabilitation, education, migratory game bird propagation, and salvage), take of depredating birds, taxidermy, and waterfowl sale and disposal. The regulations governing migratory bird permits are in *50 CFR part 13 General Permit Procedures and 50 CFR part 21 Migratory Bird Permits*.

As discussed above, migratory birds that have the potential to occur in the project area are the Golden Eagle, Greater Sage-Grouse, and Burrowing Owl. Although the property does not feature ideal nesting, breeding, or foraging habitats for the identified species, the

project action area may contain potential breeding and foraging habitat for additional migratory bird species not observed on or around the project property at the time of site reconnaissance.

3.4.2 Environmental Consequences

This section describes potential consequences to Biological Resources that may result from construction of the proposed Project. These include both temporary and permanent impacts which can be either direct or indirect consequences of the development of the proposed Project.

Vegetation

Construction of NVSolarWRX Solar BESS/PSES and components of the project will require temporary disturbance of approximately 50% of the project property's area to install pilings. No grading and a low impact construction method will be implemented for 99% of the project property. Maintenance of Rainbow Way and installation of the power poles within the Rainbow Way PUE will require temporary disturbance to an approximate 40-foot-wide PUE. In certain areas, the PUE may be narrowed to avoid impacts to sensitive habitats and special-status species. In other areas, additional workspace needs may require that the PUE be expanded temporarily beyond the 40-foot widths.

Wildlife

Construction related consequences may include loss of foraging and/or nesting habitat, decreased habitat value, disturbance of nesting sites, or habitat fragmentation. However, the majority of these impacts will be temporary, as NSW plans to restore all disturbed habitats within the project property following construction. Permanent impacts that may result from project construction are only anticipated where project improvements (electrical substation, battery energy storage system, access/maintenance roads, and fencing) will permanently alter existing habitat.

Special Status Wildlife Species

Migratory birds represent the category of special status species to have the highest potential of impact by the development of the proposed Project. Specifically, the Golden

Eagle, Greater sage-grouse, and Burrowing Owl. However, the Alkali Desert Scrub (ASC) and Alkali Basins/Flat/Playas (ABFP) habitats which comprise the vast majority of the project property are not considered prime habitat for these species. BMPs and mitigation measures have been adopted to ensure that other migratory birds will not be adversely impacted by the development of the Project.

3.4.3 Mitigation Measures

The following mitigation measures will be implemented by the project as necesarry to avoid or minimize the potential impacts to biological resources that may result from project construction, operation, and maintenance.

GENERAL PRECONSTRUCTION MEASURES

MM 1: Project Maps

Detailed construction maps showing location of sensitive environmental resources, construction sites and related features, environmental protection measures, and access routes will be provided to construction supervisors, and will be available to the construction crew members and environmental monitors prior to, and during construction activities.

MM 2: Worker Training

The project's contractor will provide a qualified biologist(s) to conduct environmental compliance training, including an endangered species/sensitive habitat education program for construction crews prior to the commencement of the project and during construction activities. Additional "tailgate" training will be conducted for new construction personnel as needed during the construction duration.

Sessions will likely include discussions of regulatory requirements, including the federal and Nevada Revised Statutes, Nevada Administrative Code, and consequences of noncompliance with these acts and requirements. Training will also include identification of special-status species that are likely to occur in the project area and discussion of the values of sensitive habitats. Training will also brief construction crews on the blooming focus surveys results concerning special-status plant species for the project areas and the findings and mitigation requirements.

MM 3: Educational Brochure

As part of construction training, the project will produce an educational brochure for crews working on the project. Color photos of threatened and endangered species, likely to occur in the project area will be included, as well as a discussion of protective measures agreed to by the project and the resource agencies of Nevada.

MM 4: Exclusion Zone Fencing

The project will mark the boundaries of environmentally sensitive exclusion zones and sensitive habitat features that are to be avoided (active burrows, active nests, special status plant species locations, etc.) before and during construction with highly visible flagging or fencing to prevent impacts from vehicles. All construction personnel will be required to conduct work activities within the defined area only.

MM 5: Vegetation Removal

The contractor will only remove vegetation within the approved work area. Low impact construction will be adhered to minimize removal of vegetation and restrict grading. General Construction

MM 6: Work Area

The contractor will confine all heavy equipment, vehicles, and construction work to approved roads and work areas. Solar array work areas will be limited to what is necessary for construction (Pile Driver). Where possible, construction vehicles will be kept out of the project area with the potential to support special-status species. Where these Biological Evaluation avoidance measures are not feasible, the project applicant will apply for and obtain the appropriate permits prior to construction from the Nevada agencies, grading permit and will implement any additional avoidance or mitigation measures that are agreed upon during the grading permit process.

MM 7: Construction Monitoring

The project will retain a qualified biologist(s) to be on-site during construction activities to perform pre-activity surveys just prior to construction to clear the work area of any special-status species, and to monitor compliance with mitigation measures.

MM 8: Workday Schedule

To the extent possible, the project will conduct all construction activity during daylight hours only. Where it is deemed necessary and feasible, night lighting and monitors will be used for work that occurs after sundown.

MM 9: Vehicle Inspection

The project will ensure that all construction personnel are instructed to visually check for wildlife beneath vehicles and equipment before moving or operating them.

MM 10: Speed Limit

The project will enforce a speed limit of 15 miles per hour on private roads and the posted speed limit on public roads.

MM 11: Trench Ramping

At the conclusion of each day's trenching or excavating activities, the end of the trench will be ramped at an approximate 2 to 1 slope to allow any wildlife that enters the trench to escape. A biological monitor may approve the use of boards placed at an approximate 2 to 1 slope for site-specific, pre-approved locations where earthen escape ramps are not feasible.

MM 12: Sensitive Habitat Monitoring and Procedures if Listed Species are Found

In accordance with the FESA, Nevada Revised Statues, and Nevada Administrative Code, the project will retain a qualified biological monitor to inspect any construction activity in habitat that is to be avoided or preserved to ensure that no unauthorized or unnecessary take of listed species or destruction of their habitat occurs. Upon recommendation of the biological monitor, the work supervisor or contractor will be responsible for avoiding and stopping all activities that may result in such take or destruction of habitat until appropriate corrective measures have been completed. The project will be responsible for immediately reporting any unauthorized impacts to the USFWS and NDOW.

MM 13: Trash Cleanup

The contractor will properly contain and remove all trash and waste items generated by construction or crew activities.

MM 14: Prohibitions for Pets, Fire, Firearms

The contractor will prohibit employees, contractors, and subcontractors from having pets, campfires, or firearms at the project sites. Smoking will be limited to designated smoking areas only.

GENERAL POSTCONSTRUCTION MEASURES

MM 15: Restoration

The project will restore work areas to pre-existing contours and conditions upon completion of work. Restoration, including revegetation and soil stabilization, will be performed as outlined in the Restoration and Monitoring Plan described below.

MM 16: Project Restoration Plan

The contractor will prepare a Restoration and Monitoring Plan to address postconstruction revegetation, success criteria, and monitoring periods in natural areas. The intent of this plan will be to ensure that impacts are minimized and adequately mitigated to the satisfaction of the permitting agencies, property owners, and/or habitat managers. Restoration will result in restoration of temporarily disturbed areas to conditions similar to preconstruction conditions. The Restoration and Monitoring Plan to be developed by the contractor for review with resource agencies will include, at a minimum, the following measures:

- At the completion of construction activities, the ROW/PUE will be graded to restore flow lines and natural topography.
- Ripping or disking will be performed to relieve compaction at identified locations as needed.
- Stockpiled topsoil will be re-spread, providing organic matter and a seed bank for restoration.
- At the completion of soil work, all areas disturbed by construction activities will be subject to implementation of permanent erosion control measures.
- Permanent erosion control measures could include spreading a combination of native grass and forb seed, fertilizer, compost, and mulch for soil protection.
- Seed mixes will be identified, for Alkali Desert Scrub (saltbush scrub areas and existing disturbed habitat areas.

MM 17: Seed Mix and Success Criteria

In sensitive communities such as Alkali Desert Scrub (saltbush scrub) areas, the project's Restoration and Monitoring Plan will include the use of native seed or plantings and will specify native species lists and propagule types, quantities of material, and appropriate success criteria and monitoring requirements to be determined in discussion with the appropriate resource agencies with responsibility for those areas (e.g., Washoe County and NDOW).

MM 18: Erosion Control

The contractor will install and maintain appropriate temporary erosion and sediment control measures until revegetation is successful as defined by the success criteria to be outlined in the Restoration and Monitoring Plan.

SPECIES SPECIFIC MEASURES

Special-status and Nesting Birds MM 19: Bird Nest Surveys and Monitoring

Because construction will take place during the breeding and nesting season of avian species in the action area (typically February 1 through August 31), the contactor's biologist will conduct nesting bird surveys prior to construction for avian species with potential to occur on-site, or where accessible, in areas adjacent to construction. Pre-construction surveys will be completed no more than 30 days prior to ground disturbance and will include a 100-ft buffer area of the project alignment to be surveyed. Where nesting migratory birds are found in or near the proposed construction areas, the birds and their nests will be evaluated by a qualified biologist. If nest disturbance is anticipated, the biologist will ensure adequate mitigation measures are implemented (MM 20).

MM 20: Nesting Birds

In accordance with the MBTA, if an active nest is observed in the action area during construction, the biologist will stop work within the appropriate buffer for the species and contact the biological monitor immediately. Nest disturbance is dependent on a number of site-specific and activity-specific factors, including the sensitivity of the species, proximity to work activity, amount of noise or frequency of the work activity, and intervening topography, vegetation, structures, etc. Additional mitigation may be required to minimize

disturbance of detected nesting activity, such as allowing nesting activity to conclude before continuing construction in an area, restricting certain types of construction practices/activities, creating screening devices to shield nest sites from construction activity, and establishing buffer areas around active nest sites. For inactive nests, measures could include removal and/or handling of nest materials, which will be conducted under the supervision of a qualified biologist.

3.5 CULTURAL RESOURCES

This section summarizes the findings of a Cultural Survey completed in fulfillment of Section 106 for the Utilities Environmental Protection Act (UEPA) administered by the Public Utilities Commission of Nevada (PUCN) for the project property (See: *Appendix C – Class III Cultural Inventory*) and discusses the potential impacts of the proposed Project on any cultural resources in the area. BPMs and any appropriate mitigation measures necessary to limit such impacts are also discussed.

3.5.1 Existing Setting

The project area is bordered on the north by the Western Union Railroad grade, but is otherwise located in undeveloped desert on the edge of a playa on the eastern arm of Honey Lake Valley. The subject property is depicted on the Flanigan, NV (2021) USGS 7.5-minute topographic quadrangle maps within portions of Section 1, 2, 11, and 12 of Township 26 North Range 18 East. The project area is relatively level with an elevation ranging from roughly 3,980 and 3,985 ft. above mean sea level. The archaeological investigation includes the entirety of the 1,680 project property with two subsets of the subject property having been subject to more in depth scrutiny, those being, a 25 acre are in the northwest corner of the project property where the project substation is to be located, due the more intensive ground disturbance activities called for in project development as opposed a to the less invasive activities proposed in the PSES portion of the project, and a 27 acre portion situated in a strip of coppice dunes bordering the shoreline of the Dead Cow pluvial lake playa situated along the southeast margins of the subject property, as a result of the identification of new archaeological sites in the area during preliminary stages of investigation, all of which were determined to be ineligible for inclusion in the National Register of Historic Places. The project area lies within EPA Ecoregion 13h, the Lahontan and Tonopah Playa region of the Central Basin and Range. The Central Basin and Range is characterized by north-trending fault-block mountain ranges separated by arid basins. The lower elevations, including valleys, slopes, and alluvial fans, are covered with shrubs and grasses, while higher mountain

slopes support woodlands, mountain brush, and scattered forests. This internally drained region is fed by rivers from the eastern Sierra Nevada slopes and the Humboldt River system

Access to the project area is along Rainbow Way, a mostly unimproved two track road depression extending along its ROW which will be improved to an all weather gravel surface in connection with the development of previously approved solar developments in the vicinity. Access to Rainbow Way is from Fish Springs Road a county improved all weather road.

Historic Context

To properly evaluate cultural resources within the APE, a relevant regional cultural overview is needed to provide specific data for evaluating their eligibility to the NRHP (Hardesty and Little 2009). The APE is located in eastern Honey Lake basin. Below is a brief outline of the prehistoric, ethnohistoric, and historic periods most relevant to the current APE.

Archaeology as a study of the material past has roots in Western intellectual traditions and as such is a knowledge production exercise utilizing theories, methods, and assumptions derived from those traditions. Archaeological evidence suggests people have inhabited the Great Basin for at least 12,000 years. Far from being “peoples without history” (Wolf 1982), indigenous people in the Great Basin have knowledge and values regarding the past (and present) that are not included in typical scientific or archaeological studies. Indeed, while the current report is necessarily couched within the schema of current regulatory compliance, the perspectives and histories of descendant communities offer alternative, and oftentimes preferred, frameworks for understanding the past. While the goal of archaeological inquiry is to elucidate the past, sometimes this method is contradictory and offensive to the worldviews of descendant populations. This disconnect speaks to the critical need for cross-cultural collaboration and empowerment of the Native narrative throughout the regulatory process.

Paleoarchaic (13,100-7,700 cal. B.P.)

The period when people first arrived in the Great Basin is referred to as the Pre-Archaic, Paleoarchaic, or Paleoindian (13,000-8,300 before the present [B.P.]), which roughly corresponds to the Terminal Pleistocene/Early Holocene transition (TP/EH; Beck and Jones

1997; Haynes 2002). During the transition to the Early Holocene, effective moisture remained high. Floral and faunal communities were much different than today; many of the region's valleys are believed to have been very productive, though complete habitation of the region is not thought to have occurred until near the time of a series of large Mount Mazama eruptions (around 8,000 to 7,700 calibrated years before the present [cal. B.P.]), after which the region experienced the most severe warm and dry period of the Holocene.

The Paleoarchaic is characterized by a distinctive toolkit of large bifacial knives, crescents, scrapers, choppers, and both stemmed and concave (fluted) projectile points utilized by TP/EH hunters exploiting the margins of still-existing pluvial lakes (Elston 1986). This interpretation arose out of the preponderance of Paleoarchaic sites concentrated along remnant shorelines of pluvial lakes within the Great Basin, which led Bedwell to name it the Western Pluvial Lakes Tradition (Beck and Jones 2008). Further research (e.g., Burke et al. 2010; Fenner and Smith 2011, cited in Fenner 2011) has led to a greater identification of upland sites, suggesting that Paleoarchaic populations likely utilized a broader range of environmental regions. Regardless, the marshy, lacustrine environments of TP/EH lakeshores provided fertile grounds for procurement of floral and faunal resources.

After many decades of work in the Great Basin, there is still little evidence to distinguish Late Pleistocene from Early Holocene occupations (Hockett et al. 2008). Both fluted and stemmed points occur in the Great Basin during the terminal Pleistocene with stemmed points persisting well into the middle Holocene for over a 4,000-year period making it difficult to distinguish many late Pleistocene Paleoindian sites with stemmed points from Early Holocene ones. Although fluted points occur in the Great Basin, they are rare (Grayson 2011), have yet to be dated directly, and often occur in association with stemmed points. Stemmed points are more common and perhaps slightly more recent with a wider geographical distribution occurring until the mid-Holocene.

Research using XRF analysis of Paleo-archaic projectile points within the western Great Basin have shown that pre-Holocene populations likely acquired lithic raw materials from one of two large foraging territories that span the current Nevada-California border, which were far more expansive than procurement zones of later populations (Smith 2010).

Paleoarchaic groups may have procured lithic raw materials while on extended big-game hunting trips, as has been suggested by Hildebrant and McGuire (2005).

Early Archaic (8,500-4,500 cal. B.P.)

Local date ranges for the Early Archaic period are reliant upon projectile point types sequenced from Monitor Valley and Gatecliff Rock shelter by David Hearst Thomas, both quite far from the project area (Thomas 1981). The Archaic is marked by a significant increase in the region's temperatures and the continued drying of the region to its current hydrological conditions (Elston 1986:138). With significant changes in the environment, there was a major shift in the local adaptation strategy characterized by the appearance of dart points and groundstone in the archaeological record at this time (Beck and Jones 2008:45-48; Elston 1986:138-141). Atlatls (spear throwers) and dart points marked the advent of a major change in hunting technology and were the major tools utilized for hunting pronghorn and mountain sheep. This new projectile point technology is represented by Elko, Gatecliff or Pinto types and large side notched projectile points recovered from both residential base camps and larger field camps (Beck and Jones 2008; Justice 2002:125-148 & 173). Intensive use of seeds processed with groundstone mark major shifts in the exploitation of the region's resources.

Although there is little direct evidence concerning subsistence at this time, it is generally assumed inhabitants were focused on a broad-spectrum diet, a general lifeway that is believed to characterize North America as a whole, with few technological and subsistence changes for nearly a 10,000-year period (Beck and Jones 2008:45). Base camps are generally adjacent to more permanent water sources such as springs, rivers, or lakes, while temporary camps for hunting and gathering are found in upland, desert scrub regions (Elston 1986:138). It is possible that special task groups exploited these high regions primarily for hunting.

As elsewhere, evidence of the Early Archaic period within the Lahontan Basin sub-region of the western Great Basin is scarce. The local date ranges for the Early Archaic period are reliant upon the projectile point types from Monitor Valley and points sequenced by David Hearst Thomas at Gatecliff Rock shelter (Thomas 1981). The earliest evidence for

occupation in the central sub-region is at Triple T and Gatecliff Shelter where Gypsum points occur with Split Stem points in deposits dating between 5,000 and 3,300 cal. B.P. roughly contemporaneous with the latter part of the Early Archaic period (Elston 1986:138).

Middle Archaic (4,500 to 1,500 cal. B.P.)

There is little technological difference to mark the Middle Archaic from the Early Archaic periods. The differences between these two periods are based primarily on a population boom and gradual shifts in settlement and subsistence strategies. A population boom is represented by intense use and occupation at Lowe Shelter and others in the central sub-region of the western Great Basin (Elston 1986:142). Winter and seasonal camps become noticeably reoccupied in the archaeological record with a greater diversification and exploitation of the region's resources including intensive exploitation of particular ecozones (Elston 1986:142). In addition, there is an increase or reuse of certain areas and an increase in the variety of activities (Elston 1986:142). There appears to be more of a reliance on the use of bifaces, seed processing, and the manufacture of grinding slabs and scrapers at Gatecliff Shelter. Diagnostic projectile points for this period include Elko and Martis series points. Elko points are bracketed at Gatecliff Shelter between 3,300 to 1,500 cal. B.P. (Thomas 1981:22).

An obsidian hydration analysis of 109 projectile points from northeastern Nevada (including Danger and Hogup caves) reveals Elko and Split Stem or Pinto forms may have been in the Bonneville Basin region as early as 8,000 years ago (Hockett 1995:43), nearly 5,000 years earlier than at Gatecliff Rock shelter. The presence of these point types at Gatecliff between 5,000 and 3,300 supports the theory of gradual diffusion of these forms from the east.

The first evidence for trade and exchange occurs during this period with the presence of obsidian, shell beads, and portable rock art with motifs. Big game hunting appears to remain an important subsistence strategy with a focus on mountain sheep and to a lesser degree antelope and deer. This hunting strategy would appear to remain a focus of local inhabitants until contact with Europeans.

Late Archaic (1,500 to 650 cal. B.P.)

The Late Archaic period begins around 1,500 cal. B.P with the advent or appearance of technological changes across the Great Basin including the introduction of the bow and arrow and ceramics (Elston 1986:145-148). Within the Lahontan Basin sub-region of the Western Great Basin, the Late Archaic is marked by the beginning of the Underdown phase identified at Gatecliff Shelter dating between 1,500 and 650 cal. B.P. (Elston 1986:146). Evidence for some contact with the horticultural groups such as the Fremont and Ancestral Puebloan includes a few pot sherds at rock shelters at Newark Cave, Lowe Shelter, and others (Elston 1986:146). Diagnostic projectile points are smaller (arrow-size) points and include triangular and Rosegate Cluster points, which are found throughout the Great Basin and eastern California where they have been dated between 1,500 and 650 cal. B.P. (Justice 2002:320-330).

The degree to which horticultural groups (Fremont or otherwise) influenced traditional Archaic hunters and gatherers in the region is largely unknown. The presence of ceramics in the area may be an indicator of agricultural developments or obtained as trade items that did not result in a significant change in land use patterns and site structure. The most dominant ceramic type in the local record at this time was Brownware pottery after 1100 (Elston 1986:145).

Late Precontact (Cal. 650 B.P. to Contact)

The Late Precontact period post-dates the Fremont and Ancestral Puebloan occupations and is marked in the archaeological record by the presence of Intermountain Brownware and later style triangular arrow points including the Desert Side Notch and Cottonwood series projectile points around 700 years ago (Bischoff et al. 1999:56-57; Konoske et al. 2009:18; Thomas 1981:15-19). The Late Precontact period encompasses many of the cultural and technological practices of Native groups ancestral to today's population within the Lahontan Basin and which was present at the time of European and later American contact around 200 years ago (Stever 2011:25).

Early Exploration

In the 1820s, the Great Basin was one of the largest expanses of the United States that remained unexplored (Morgan 1997:36). Early American exploration of Nevada was first accomplished by fur trapping and trading. John C. Fremont, working for the Bureau of Topographical Engineers, was the first professional surveyor to enter the Great Basin. Through official government reports, Fremont was the first Euro American to provide detailed knowledge with the goal of opening of the Great Basin and Nevada to Euro American settlers and to the expansion of the American West (Egan 1985). On one expedition from California through the Carson Valley in 1844, Fremont met and spoke with a group of Washoe, writing about them in his journal (Makley 2018, 5; Egan 1985: 199-212).

Settlement

After the discovery of gold in California in 1848, this flow of emigrants increased considerably through Nevada (Hulse 1978:38). By the mid-1850s, thousands of travelers were passing through Nevada on their way to California. This onslaught of emigrants, along with the success and growth of the mining districts such as the nearby mining districts, brought about the need for farms and ranches to supply the increasing number of miners and prospectors arriving in the area. Congress established the Territory of Nevada in March of 1861 (Hulse 2004:75).

Mining

The history of mining in Nevada may start as early as the 18th century with Spanish and later Mexican missionaries sponsoring gold mining operations in the region, although these reports are unverified and may be apocryphal (Tingley et al. 1993: 8). Mormons using the Old Spanish Trail began preliminary exploration and exploitation of placer gold near Johnsonville. The discovery of the source of this placer gold, the Comstock Lode, happened in 1859 and brought tens of thousands of people into the area, leading to a population boom that enabled Nevada to be admitted as a state in 1864. After the Comstock rush, mining in the state experienced a period of decline from roughly 1881 to 1900 (Tingley et al. 1993, 18). Afterward, discoveries of gold and silver in places such as Tonopah and later Goldfield, brought a resurgence of mining into Nevada. The Lahontan Basin also saw increased mining

activity in the years immediately following 1900, and three mining districts are in close proximity to the NVSolarWRX Project area: Talapoosa, Ramsey, and Churchill.

Although mining is a critical part of Nevada's state history, its legacy has negatively impacted Native American communities by poisoning the land, excluding tribal communities from accessing the wealth it generates, and causing disruptions to indigenous land use, family units, and social structures. Mining is a quintessential example of extractive colonialism and is closely tied with settler colonialism. Settler colonialism "destroys to replace" and is predicated on a global supply chain linking a distant 'frontier' to a metropolis (Wolfe 2006: 388, 394.). The amount of silver, gold, and other precious metals pulled from the lands of present-day Nevada was closely linked with national and international markets, supply chains, and the growth of wealth, especially for speculators and businessmen located in large cities on both the east and west coasts. The large number of mines and their associated waste products in Nevada ensures that future generations of tribal communities will continue to be impacted.

Hardrock mining poisons the land by introducing heavy metals such as arsenic, mercury, and lead into the soil and waterways (Bonogofsky and Gearon 2013: 4). The contamination can last for decades. For instance, lead contamination in Steamboat Springs from both the Steamboat Springs and Union mines south of Reno continues to pose risks to local populations. Native communities who drink water from historic water sources, or gather local plant and animal resources for food, medicine, or ceremonial purposes are at particular risk of contamination (Bonogofsky and Gearon 2013: 4; Lewis et al. 2017: 130).

Mining also creates and reinforces inequality, as the extracted mineral wealth flows unevenly away from those who helped produce it or from whose lands it was taken. Starting in 1891, the U.S. government embarked on a legislative campaign to exclude indigenous communities from accessing mineral rights on their own lands, usually through a direct abrogation of treaty rights. In establishing reservations where tribal communities ostensibly had sovereignty, the U.S. government often excluded mineral-rich areas from reservation boundaries. In cases where mineral rights were included within tribal lands, the government mobilized the legal system against indigenous land claims, as when the 66th Congress of the

United States gave mineral extraction rights on tribal lands to corporations or individuals in direct violation of previously established tribal sovereignty (Lewis et al. 2017: 131).

The flow of Euro-American settlers into the Lahontan Basin as a result of mining or other extractive practices represented the beginnings of settler colonialism in the area and led to major disruptions in traditional ways of life for Northern Paiute communities. Although many Euro-American settlers in Nevada left once mines went bust, many others stayed, and the resulting legal and economic apparatus that fell into place during Nevada's early statehood days was designed to consolidate political and economic power in the hands of Euro-American communities to the exclusion of Native communities.

Ethnographic Setting

The project area lies in Northern Washoe County, approximately 12 miles from Pyramid Lake. This is the traditional homeland of the Northern Paiute people, and particularly the Lake Pyramid Paiute. The following section provides a brief description of Paiute lifeways at the time of first contact with European and American colonizers. Paiute peoples have not disappeared, but rather continue to live and thrive in the region today.

The Northern Paiute at the time of contact with Europeans and later Americans occupied a vast territory east of the Sierra Nevada mountains, northward to the drainages of the Columbia and Snake Rivers, and south to the Tahoe area, where at least in the 19th century, they lived alongside Washoe peoples, fishing and hunting in some of the same areas (Fowler and Liljeblad 1986; Lerch et al 2010.) Northern Paiute communities were hunters and gatherers, taking both small and large game using bows and arrows or traps for smaller animals and using woven baskets to collect hundreds of different types of plant resources, including pinyon pine in the fall. Especially for Paiute groups living in close proximity to Pyramid Lake and the upper Truckee River, fishing was very important, with platform and weir fishing common during spawning runs in both the lakes and the rivers (Fowler and Liljeblad 1986). Waterfowl were also hunted using tule-reed boats and water decoys. These practices continue today, and the Pyramid Lake Paiute Tribe are the caretakers of the lake and its resources, as they have been for centuries.

In 1859, fearing the detrimental effect of the massive influx of American settlers following the discovery of the Comstock Lode, Major Frederick Dodge, an Indian affairs agent, requested two reservations be set aside for Northern Paiutes, including one centered on Pyramid Lake. This request would be granted in 1879, but the Pyramid Lake Paiute Tribal Council would not be established until 1934-1936 (Rusco 1988).

Records Search

Prior to initiating the Class III survey of the project area, UES conducted a background literature review and archival records search to document the extent and intensity of previous archaeological work in the area and to develop expectations for the number and type of cultural resources that would be encountered during the block survey. The literature review consisted of a records search using the following sources:

Nevada Cultural Resources Information System (NVCRIS) online GIS database

The area of the APE and a one-mile buffer radius was searched, looking for previously recorded archaeological sites, surveys, rural architectural inventories, NR-listed resources, and in process resources (NVCRIS 2024). Linear resources were traced out beyond this one-mile buffer to identify other recorded segments and site numbers.

BLM Nevada General Land Office (GLO) Survey plats

Federal and state land patent records. The original survey plats for the area were searched as well as any updated survey plats or land transfer records (BLM GLO 2022)

Historic topographic maps and aerial photographs

Historic topographic maps at various scales including 1:100,000, 1:62500, and 1:24000 were consulted to search for potential historic trails, roads, or other linear features (USGS 2022). Historic aerial photographs were consulted to verify the information provided on historic topographic maps and to search for features that may not have been mapped. (NETR 2022).

The NRHP and Nevada State Register databases

Although the NVCRIS search included resources listed on the National Register, there are occasionally gaps between federal and state NR resource databases. UES searched both the NRHP and the Nevada State Register (Nevada State Historic Preservation Office 2022)

online databases to identify any potential resources that may not have been listed in the NVCRIS database.

Background Literature Search Results

A NVCRIS search of the project APE and a 1-mile buffer identified nine (9) previously recorded archaeological sites, eight of which are "in process" with no site forms available for review. None of these sites are located within the 25-acre substation project area or the larger 1,715-acre NVSolarWRX Project area. WA6362 is located at the extreme northern margin of the 1-mile research buffer, and most of it lies outside.

The NVCRIS search also identified three (3) previously recorded archaeological inventories (Table 7), none of which include any portion of the NVSolarWRX Project. Based on the results of the NVCRIS search, it is clear that neither the 25-acre substation nor the larger project have been previously surveyed for cultural resources.

Archaeological Sites and NRHP Resources

Nine (9) in process sites and one previously recorded archaeological site were located within the 1-mile research radius for the NVSolarWRX Project. WA6362 is an open air precontact site that was considered not eligible due to a lack of data potential and integrity. The remaining sites were recorded by Mesa Field Services in 2013 and are still in process. Their IMACS forms are not currently available for review. With the exception of the Western Pacific Railroad, the in process resources are located roughly 844 meters west of the NVSolarWRX Project boundary.

Table 7. Previous archaeological inventory projects within one mile of the APE

Report Number	Lead Agency	Report Title	Author(s)	Report Year
18-36	BLM Winnemucca	N/A	Moore, J.	2000
18-136	BLM Winnemucca	Cultural Resources Overviews of Five Proposed Wilderness Areas in Northern Nevada: Heusser Bristlecone Natural Area, Goshute Canyon, Blue Lake, Mahogany Mountain, Tule Peak (from NADB)	Seelinger, Evelyn, B. Brown, and M. K. Rusco	2005
32482	BLM Winnemucca	A Class III Inventory for the US Gypsum Empire Natural Gas Pipeline, Washoe County, Nevada	McNees, L.	2005

Archeological Inventories

Three previously conducted Class III surveys were located within 1 mile of the project area, although none of them encompass any part of the project boundary. They were all conducted for the BLM Winnemucca District (Table 8). A large block of the 18-136 survey area exists on the southeastern boundary of the Simmons project area.

Table 8. Previous recorded archaeological sites within one mile of the APE.

Trinomial	Age	Resource Type	Description	NRHP Status	Exists within APE
WA6362	Precontact	Site	Open camp	Ineligible	No
S2852	Historic	Linear	Western Pacific RR	In Process	No
WA12841	Historic	Linear	Dismantled telegraph line	In Process	No
WA13510	Precontact	Site	Lithic scatter with groundstone	In Process	No
WA13511	Precontact	Site	Lithic scatter with Blackrock concave	In Process	No
WA13514	Precontact	Site	Lithic scatter	In Process	No
WA13515	Precontact	Site	Lithic scatter	In Process	No
WA13516	Precontact	Site	Lithic scatter with groundstone	In Process	No
WA12851	Historic	Linear	Two-track	In Process	No

Archival Research

BLM GLO Plats

The original survey plat from 1873 from Township 26N Range 18E was available for review through the BLM's GLO online database. It shows the project area situated on a sandy alkali plain and within the shorelines of an alkali lake. These shorelines extend farther west than they do on more modern topographic maps and from what was observed in the field. The road to Surprise Valley, with its various connections to other roads, lies far south of the Simmons project area, and it is unlikely that any historic transportation features from the late 19th century will be located within the project boundary.

Historic Topographic Maps

USGS historic topographic maps of the project area were available for the years 1886. 1894, 1955, 1964, 1984 and select years between 2011 and 2020 and were reviewed through USGS Topoview. The relevant maps are discussed below. A review of the earliest maps, from 1886 and 1894, shows essentially the same situation as the GLO survey plat: the project area

lies on the alkali flat on the edge of the playa and there is no development north of the project area. Flanigan, and the Western Pacific Railroad, do not appear on topographic maps until the 1950s, and the project area remains undeveloped. This situation does not change in the 1964 and 1984 maps, and by 2011 the project area is depicted on maps looking essentially as it does today.

Table 9. Historic Maps.

Historic Maps	Observations
1873 GLO Maps, Township 26 North, Range 18 East	It shows the project area situated on a sandy alkali plain and within the shorelines of an alkali lake. These shorelines extend farther west than they do on more modern topographic maps and from what was observed in the field. The road to Surprise Valley, with its various connections to other roads, lies far south of the project area, and it is unlikely that any historic transportation features from the late 19th century will be located within the project boundary.
USGS Historic Topos, 1886 and 1894	Essentially the same situation as the GLO survey plat: the project area lies on the alkali flat on the edge of the playa and there is no development north of the project area.
USGS Historic Topos, 1955	Flanigan, and the Western Pacific Railroad now appear and the project vicinity remains undeveloped.
USGS Historic Topos, 1964, 1988, and 2011	No noteworthy changes from previous map with the project area being depicted essentially as it is today.

NBMG District Files Search

The project area does not exist within the boundaries of any mining districts, but it is close to the Sand Pass district centered on the tail end of the Virginia Mountains to the east and the State Line District centered on the Fort Sage Mountains further south. Sand Pass was a non-metallic district, with deposits of various clays (including kaolin), sulfur, calcium carbonate, and fluoride. An undated mining map of the Sand Pass district (post 1962, likely from the 1970s) depicts mine claims close to Flanigan but situated in the hills to the east. Small hand-drawn red marks on the map in the Honey Valley could also be mining claims.

Historic Satellite Imagery and Aerial Photography

UES reviewed historic aerial photographs from the National Environmental Title Research (NETR 2022) for the project area. The earliest available aerial photo was from 1962. It shows the Simmons project area located south of the Western Pacific Rail Line and

Southwest of Flanigan. The project area is undeveloped and is crisscrossed by dry washes leading to the dry playa. Historic aerials from 1980, 1993, 2005, 2010, 2013, and every year from 2014 to 2020 demonstrate that no real changes have taken place within the NVSolarWRX project area, with the exception of the creation of the Dead Cow Airstrip, which took place between 2020 and 2023. It is characterized by a series of two track roads, a radial feature, and an airstrip storage and lookout facility.

National Register of Historic Places (NRHP)

No historic properties listed on, or considered eligible for listing on, the NRHP were identified in the NR online database.

Archaeological Field Survey

UES conducted a Class III Cultural Resources Inventory (block pedestrian survey) of the approximately 25-acre Phase 1 substation parcel, located in the northwestern portion of the overall NVSolarWRX project area, and an additional survey area along the shorelines of the playa (27 acres) in two person days on October 22, 2024. Survey and site recording methods followed the BLM's *Guidelines and Standards for Archaeological Inventory, Sixth Edition* (BLM Nevada Sixth Edition 2019).

SURVEY METHODS

A block survey was completed by walking parallel transects across the project area that were spaced 30 meters apart and oriented to the cardinal directions. When cultural resources were located, the survey paused and personnel walked closer transects around the area to determine whether the find was an isolate or part of an archaeological site. If the artifact was part of a site, the archaeologists used tightly spaced transects to establish the boundaries of the site.

SITE AND ARTIFACT RECORDING

A site is defined as a location with two or more artifacts or features within 30 meters of one another. An isolated artifact, by contrast, is a single artifact with no other cultural materials present within 30 meters. An artifact may still be an isolate if numerous pieces from the same object are located in close proximity (e.g., a broken bottle). The same logic was applied to lithic reduction episodes, when it was clear that the find represented a single cobble with a few flakes removed. Isolated artifacts were recorded using FulcrumTM Field Inspection Management

Platform (Appendix B). Fulcrum creates single, georeferenced records where artifact information and photographs can be stored. These records are curated in a cloud-based database that UES backs up at regular intervals. All artifact attributes can be recorded in a single record within Fulcrum. All photos were taken using a 12-megapixel iPhone SE or higher and converted to TIFF format in accordance with BLM photography standards and recorded on an image log (Appendix C).

Sites were recorded using standard IMACS Short forms (Appendix D) and associated forms for different artifact classes (e.g., cans, glass, flake debitage, etc.). Site boundaries were recorded in Fulcrum by creating a georeferenced point with attached overview photos and later converted to a polygon feature in QGIS (version 3.28). At least two overview photos were provided for each site, depending on its size. Diagnostic artifacts, features, and artifact concentrations within sites were also plotted using Fulcrum. Fulcrum utilizes the internal GPS chipset for whichever device it is currently using, and thus cannot provide the sub-meter accuracy required for site mapping according to the BLM standards. Therefore, for site mapping, the device using Fulcrum (typically a smartphone) was paired with a Bad ElfTM GNSS Surveyor, which provides in-the-field accuracy to within 1 meter and allows for sub meter accuracy during post processing.

Previously recorded sites were revisited and subjected to minimum recording standards following BLM guidelines. This usually meant remapping site boundaries to modern GIS standards, noting any additional diagnostic artifacts or features that were not previously recorded, and commenting on the integrity of the site. Updated IMACS forms are included in Appendix D.

GIS shapefiles for all site boundaries, diagnostic artifacts, and isolates are provided as a supplement to this report using the NAD 83 datum, zone 11.

RESULTS OF SURVEY

The Class III inventory did not result in the identification of any archaeological sites or isolated artifacts within the 25-acre Phase I substation parcel. Within the additional 27-acre survey area, three new archaeological sites were recorded. No previously recorded archaeological sites were present in the APE that required updates.

Table 10. New Site Summaries and NRHP recommendations

BLM Resource No./Trinomial/Field No.	Temporal Association	Description	NRHP Status Recommendation
UES-010-001	Precontact	Sparse lithic scatter	Ineligible
UES-010-002	Precontact	Sparse lithic scatter	Ineligible
UES-010-003	Precontact	FAR hearth feature	Ineligible

Temporary site number: UES-010-001

State site number: Pending

Eligibility: Ineligible (D)

The site is a sparse lithic scatter comprised of 2 flakes (1 chert, 1 chalcedony) and 2 angular fragments (shatter) of heat-treated chert with evidence of pot lidding. The site is located on the edge of the Dead Cow playa between hyper deflated coppice dunes topped by desert shrubs with otherwise very little vegetation in the surrounding area. The site measures approximately 26 x 8 meters and has an artifact density of 1 artifact/square meter.

Temporary site number: UES-010-002

State site number: Pending

Eligibility: Ineligible (D)

The site is a sparse lithic scatter comprised of 15 flakes of five distinct material types. Although the artifact density never exceeds 2 artifacts/square meter, the site itself is fairly large, measuring approximately 60 x 20 meters. The site is located on the edge of the Dead Cow playa, approximately 141 meters south of the Dead Cow Airstrip facility and is situated between hyper deflated coppice dunes topped by desert shrubs with otherwise very little vegetation in the surrounding area.

Temporary site number: UES-010-003

State site number: Pending

Eligibility: Ineligible (D)

The site consists of a single feature, a roughly 3 x 2 m FAR scatter containing pieces of basalt and caliche that range from 4 cm to around 25-30 centimeters in length. In total, the feature is made up of 25 separate stones that are noticeably concentrated in the area and some of which

exhibit clear signs of heat treatment. One of the caliche fragments is a small slab and resembles a slab metate, but no signs of use wear were observed so it may not have served that function. It is most likely a deflated hearth feature, but a trowel scrape through the rocks did not reveal any charcoal staining or evidence for subsurface deposits. The site is located on the edge of the Dead Cow playa between hyper deflated coppice dunes topped by desert shrubs with otherwise very little vegetation in the surrounding area. Feature 1 is the entire site.

3.5.2 Environmental Consequences

The proposed NVSolarWRX Project will have the potential for an adverse impact on archaeological resources in the APE. However, none of the newly identified sites are eligible for inclusion on the NRHP so these impacts are not expected to be extensive and are considered acceptable and less than significant. None of the previously recorded sites, all which were conducted for the BLM Winnemuca District, do not encompass any part of the project boundary, nor will they be traversed for site access and therefore will not be affected by Project development.

3.5.3 Mitigation Measures

Despite the lack of prehistoric sites eligible to the NRHP, there is still reason to ensure the avoidance of potential disruption of artifacts. Appropriate spacing of transmission equipment and confining construction activities to established roadways (Rainbow Way PUE) and staging areas will ensure that this is possible. Alternatively, the resources may be appropriately removed and cataloged by a professional archeologist. If potential resources are found during project construction, the shall contractor halt work immediately and a professional archaeologist mobilized to the site to evaluate the find and determine appropriate further steps and mitigation measures as necessary. If significant resources are discovered, they would be recovered and turned over to the owner of the parcel on which they were found.

3.6 LAND USE

This section analyzes the potential impacts on land use and planning that may result from the proposed NVSolarWRX Project. Land use describes the ways in which a community utilizes land, including the applicable planning policies of the relevant jurisdiction. This includes what is built, where it is built, and includes aspects such as the ownership of land as well as the governing entities' management plans and zoning that regulate development and define types of land use. This section describes the land uses in the area and the NVSolarWRX Project's consistency with the zoning criteria of the area.

3.6.1 Existing Setting

The proposed project property and the adjacent area is part of the High Desert Planning Area in Washoe County. The Project site is zoned as “General Rural” zoning classification, which according to the Washoe County Development Code (Division Three: Regulation of uses) allows for renewable energy production with a Board of Adjustment Special Use Permit, to be approved by the Washoe county Planning Commission for projects which meet the criteria for projects of regional significance, such as the proposed NVSolarWRX Project (Washoe County, 2023). The NVSolarWRX Project would be located on vacant rangeland that has been dedicated to agricultural uses for nearly a century and is therefore considered previously disturbed despite the lack of permanent structure or other improvements typically associated with developed properties.

The Project site is located within a sparsely populated area of Washoe County approximately 40 miles North of Reno within the Honey Lake Valley. The surrounding land is primarily characterized by open rangeland zoned for agricultural uses with some portions of the Honey Lake Valley are used recreationally for off-road vehicles and other outdoors leisure activities. The NVSolarWRX Project would include an approximately five-mile 345 kV gen-tie power line to be located entirely within an existing, dedicated utility and access easement which runs along the private right of way for Rainbow Way from the project property to the NV Energy’s Fort Sage substation.

3.6.2 Environmental Consequences

Construction of the Project would convert the project site into a solar generation facility and associated infrastructure. As described previously, the Project site is in a remote area with a few nearby residents. Similar solar energy generation facilities currently are planned in the area surrounding the Project. Development of the Project current zoning designations would not conflict with any current or known authorized land uses and is consistent with other development activities occurring in the surrounding area.

3.6.3 Mitigation Measures

Because development of the Project is consistent with the established goals and policies of Washoe County as codified in *Chapter 110 of Washoe County Code*, the Project would not have an adverse effect on current or known future land use activities in the area, mitigation measures are not warranted.

3.7 TRANSPORTATION

This section describes the traffic and transportation facilities in the area, potential impacts of the proposed Project on these resources, and BMPs/mitigation measures designed to reduce potential impacts to a level of non-significance.

3.7.1 Existing Setting

The project property is in a remote area in northern Washoe County, as described earlier. The project property is generally accessed via US Highway 395 to Hackstaff Road, to Fort Sage Road in California, which becomes Fish Springs Road in Nevada, Rainbow Way, and a private access easement which extends east from Rainbow Way to the project property. Ingress and egress for the project property during both construction and operation would follow this same trajectory. Both Fish Springs/Fort Sage Road are hard-packed gravel all weather roadways with low traffic volumes. Rainbow Way is hard packed dirt road with very low traffic volumes.

3.7.2 Environmental Consequences

During peak construction, an estimated maximum of approximately 200 daily trips for arriving/departing construction workers, and 50 truck trips per day would be required to supply concrete, construction materials, and equipment to the Project site. Though construction- related traffic for the Project would increase traffic compared to present conditions, no impacts to level of service are anticipated. Traffic is also expected to increase minimally as a result of occasional site visits for maintenance operations to the gen-tie line and solar facility. Daily operation is to be carried out from an offsite location and would therefore not result in a regular increase on traffic on area roads.

3.7.3 Mitigation Measures

Because the proposed NVSolarWRX Project would not result in substantive impacts to traffic conditions; mitigation is not warranted.

3.8 VISUAL RESOURCES

Visual resources are the natural and cultural features of the landscape that can be seen and that contribute to the public's appreciative enjoyment of the environment. Visual resources, or aesthetic impacts, are generally defined in terms of a project's physical characteristics and potential visibility, and the extent to which the project's presence would change the perceived visual character and quality of the environment in which it would be located.

This section describes existing regional visual character, visual resources, views of the project area from important vantage points, and the changes in these views that would occur with the implementation of the proposed NVSolarWRX Project and the BMPs/mitigation measures intended to reduce these impacts, if warranted.

3.8.1 Existing Setting

The proposed project property is in the southern end of the Honey Lake Valley just over nine (9) miles east of Herlong. The proposed project property is located on flat lands which do not possess significant natural topographic variation. The immediate surrounding area of the proposed project property is characterized by open range lands in all directions which allows for unobstructed views to the horizons or nearby mountains. In the surrounding area of the proposed project property, several natural gas line facilities, electrical transmission lines, and elevated railroad exist. Southwest of the proposed project property is the Alturas Interconnection Transmission Power Line which has utility infrastructure with heights that reach over the range lands approximately 100 feet and can be seen from a distance, such as transmission line towers. The proposed project vicinity has been used in the past as cattle grazing range land and is disturbed only by natural gas line easements for the several gas lines. The project property is located approximately eight miles from any residential, military, commercial, or industrial land uses centered in the community of Herlong. US Highway 395 is located approximately eleven miles southwest of the proposed project property and has no view of the site due to obstructions such as Fort Sage Mountain and other topographic features which limits sight distance from this highway.

To the south of the project property Fort Sage Mountain can be seen in the background and the base of the mountains are located approximately five miles south of the proposed project property. The top of the Adams Peak at 8,200 feet above sea level and Crystal Peak at 7,900 feet above sea level are approximately 16 ½ miles from the proposed project site and can also be viewed from the site on a clear day. Local regional land uses which affect the visual character include: Union Pacific Railroad elevated rail bed (runs just north of the proposed project property); open cattle range lands/sage brush (west/north of the proposed project property); a dry lake bed (south/east of the project property); Sierra Army Depot with associated structures and storage of military equipment (west of the proposed project property); Flanigan (northeast of the project property) and public utilities facilities (High Power Transmission Lines, High Pressure Natural Gas Pipelines) (south/north/west of proposed project property).

The proposed NVSolarWRX Project property is located one (1) mile east of Rainbow Way of the intersection of Rainbow Way and approximately 2 miles north of Fish Springs Road in rural Washoe County. A raised railroad bed which carries the Union Pacific Railroad approximately 5 to 7 feet higher than the surrounding elevation of the property runs generally NE/SW, approximately one quarter (0.25) mile north of the project property. The property forms a large rectangle with a small dog leg extending to the east. The greatest width of the property is approximately two (2) miles with a length approximately 2 (2) miles. The total approximate acreage of the property is 1,692 in size. Additionally, the Rainbow Way Regional Utility Corridor runs along Rainbow Way, approximately two miles west of the project property, from the Union Pacific Railroad to the NV Energy Ft Sage Station (approximately five miles). Installation of a generation tie line would entail disturbance of approximately 13 acres within existing access and utility easements located within this corridor. As a result, the total disturbance area associated with the project is to be 1,705 acres. The landscape surrounding the project property and gen-tie corridor in all direction is characterized by basin and range sage brush landscape with various mountain ranges in the distance. The entire project area is located within an area that is primarily undeveloped open

rangeland for cattle grazing and playas in Washoe County. In general, prominent adjoining land uses are as follows:

- West: The Nevada/California State Boundary Line lies just approximately 3 miles from the western limit of the property accompanied by undeveloped open rangeland.
- North: Union Pacific Railroad and undeveloped open rangeland.
- East: The Dead Cow Lakebed is along the eastern limit of the property.
- South: Undeveloped open rangeland and playas.

The landforms in and around the proposed project property range from relatively flat or slightly undulating in the foreground, to low hills in the middle ground, to mountainous in the distance. The proposed project property is vegetated with a variety of weeds and native plants (sagebrush) and grasses. Colors and textures in the landscape would vary somewhat by season, but consist primarily of shades of green, tan, and brown in vegetation with shades of gray and black in the exposed earth while the dry lakebed bottoms in the region of the proposed project property provide a lighter almost white shade of soils.

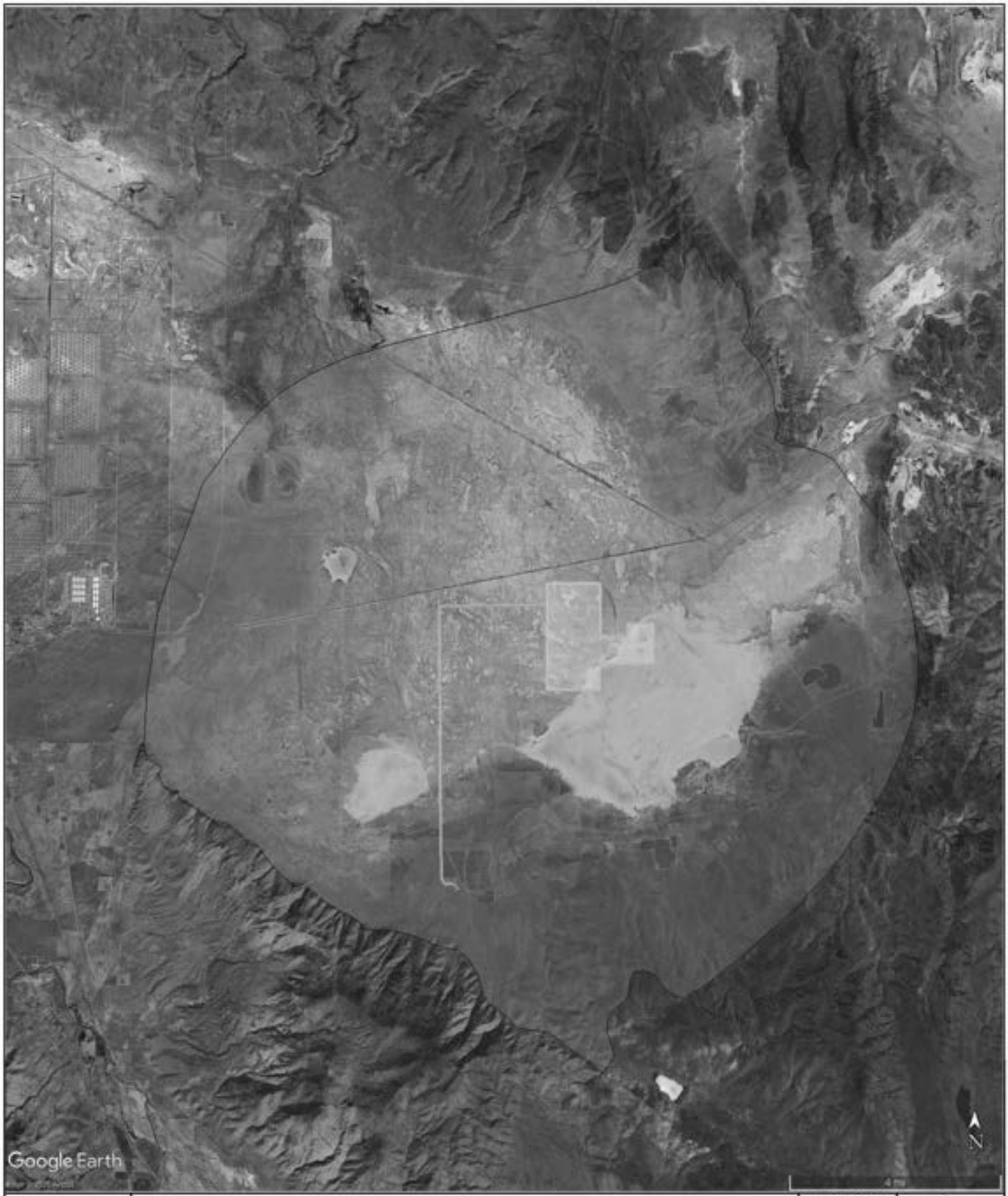
3.8.2 Environmental Consequences

Although the construction of solar facilities under the proposed Project would change the existing local landscape, the surrounding region is already developed with military installations, and public utilities infrastructure including other solar energy production facilities, with the remaining land being open sagebrush rangelands, the military and utilities features take on the dominate visual focus of sensitive viewers. The relative visibility of the proposed project property from residences, industrial, institutional, and commercial properties is low (See: Figure 6, Viewshed Map). The vantage points with the clearest views of the proposed project property are distant elevated locations such as from the Fort Sage Mountain Off-Road Vehicle Trails. Furthermore, the general viewshed is highly disrupted by existing man made public utilities, military installations or transportation infrastructure, ranging from the US Route 395, to military equipment stored on nearby Sierra Army Depot, high power electric transmission lines, electric distribution lines, Fort Sage and Herlong power substations, dry lake bottoms, train tracks, undeveloped cattle grazing rangelands,

etc.). The minimal topographic relief does not provide the viewers with a vivid viewshed or long sight distances while in the valley area close by the proposed project property. As a result of the existing development in the nearby vicinity (Herlong, Sierra Army Deport), the viewer sensitivity remains low to moderately low for agricultural, military, residential, and industrial viewers, and moderate to more distant recreational viewers. As such, these viewers, who are already in an impacted viewshed, and will receive minimal, if any, impact from the proposed NVSolarWRX Project.

3.8.3 Mitigation Measures

Because of the distance to sensitive receptors and consistent nature of potential impacts with the existing visual character of the viewshed, mitigation is not warranted.



UES

VIEWSHED MAP

NVSolarWRX PSES/BESS Project
Washoe County, NV

FIGURE	6
DRAWN BY	JMB
CHECKED BY	BLM
PROJECT MGR	BLM
DATE	02/2025
PROJECT NO.	0108.0000

3.9 NOISE

The following section addresses noise as it relates to the construction and operation of the proposed NVSolarWRX Project. A review of the setting surrounding the project property was carried out in order to identify any noise impacts that might occur. Noise sensitive receptors closest to the project property are identified and mitigation measures required to avoid significant impacts to said receptors are discussed, where necessary.

The decibel scale used to describe sound levels is a logarithmic rating system to account for large range in audible sound intensities. A general rule for the decibel scale is that a 10-decibel (dB) increase in sound is perceived as a doubling of loudness by the human ear. For example, a 55-dB sound level would sound twice as loud as a 45-dB sound level. Generally, people cannot detect differences of 1-dB whereas a 5-dB change is clearly noticeable.

Several sound measurement descriptors are used to assess the effects of sound on the human environment. These include the equivalent sound level, Leq, which is the level of a constant sound that has the same sound energy as the actual fluctuating sound. It is like the average sound level. The day-night sound level, Ldn, is like the 24-hour Leq except that a 10-dB penalty is added to sound levels between 10 p.m. and 7 a.m. to account for the greater sensitivity of people to sound at night. The Community Noise Equivalent Level, or CNEL, also places a weighted factor on sound events occurring in the evening hours. L90 is the sound level that is exceeded 90 percent of the time and is often used to describe the background or residual sound level.

Acoustics is defined as the science of sound, including the generation, transmission, and effects of sound waves, both audible and inaudible. Noise, on the other hand, is generally defined as loud, unpleasant, unexpected, or undesired sound that disrupts or interferes with normal human activities. Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. The objectionable nature of sound is caused by its pitch or loudness. Pitch is the height or depth of a tone or sound wave, depending on the relative rapidity (frequency) of the sound vibrations by which it is produced. Higher pitched signals sound louder to

humans than sounds with a lower pitch. Loudness is intensity of sound waves combined with the reception characteristics of the ear. Intensity is a measure of the amplitude or height of the sound wave. Frequency describes the sound's pitch and is measured in Hertz (Hz), while intensity describes the sound's loudness and is measured in dB.

Applicable Sound Measurements

The A–weighted decibel (dBA) is a method of sound measurement which assigns weighted values to selected frequency bands to reflect how the human ear responds to sound. The range of human hearing is from 0 dBA (the threshold of hearing) to about 140 dBA which is the threshold of pain. In general, a three to five dBA change in community noise levels starts to become noticeable, while one to two decibel changes are generally not perceived. Quiet suburban areas typically have noise levels in the range of 40–50 dBA, while those along arterial streets are in the 50–65+ dBA range. Normal conversational levels are in the 60–65 dBA ranges.

In addition to the actual instantaneous measurements of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. To analyze the overall noise levels in an area, noise events are combined for an instantaneous value or averaged over a specific time period. The time–weighted measure is referred to as equivalent sound level and represented by energy equivalent sound level (Leq). The percentage of time that a given sound level is exceeded also can be designated as L10, L50, and L90. The subscript denotes the percentage of time that the noise level was exceeded during the measurement period. Namely, an L10 indicates the sound level is exceeded 10 percent of the time and is generally taken to be indicative of the highest noise levels experienced at the site. The L90 is that level exceeded 90 percent of the time and this level is often called the base level of noise at a location. The L50 sound (that level exceeded 50 percent of the time) is frequently used in noise standards and ordinances.

The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within ±1 dBA. The data is then imported into computer sound models. These computer models are used to predict

environmental noise levels from sources such as roadways and airports over a given area using equal sound level contours. The accuracy of the predicted models depends upon the distance the receptor is from the noise source and natural attenuation caused by structures and other sound barriers. The closer to the noise source, the greater is the model's accuracy (±1–2 dBA).

As a rule, sound from localized or point sound sources spreads out as it travels away from the source, and the sound level drops at a rate of 6 dBA for each doubling of distance (determined as measured from initial distance from the sound). If the sound source is long in 1 dimension, such as traffic on a highway, the sound source is considered to be a line source. The sound level from a line source generally would drop off at a rate of 3 dBA for each doubling of distance. If the intervening ground between the line source and the receptor is acoustically "soft" (e.g., ground vegetation, scattered trees, clumps of bushes), an attenuation rate of 4.5 dBA for each doubling of distance is generally used.

Any solid structure such as a berm, wall, or building that blocks the line of sight between a source and a receiver serves as a sound barrier and would result in additional sound attenuation (e.g., perimeter screening fence and vegetative hedge surrounding project property) The amount of additional attenuation is a function of the difference between the length of the sound path over the barrier and the length of the direct-line-ofsight path. Thus, the sound attenuation of a barrier between a source and a receiver that are very far apart would be much less than the attenuation that would result if either the source or the receiver is very close to the barrier.

3.9.1 Existing Setting

The proposed NVSolarWRX Project is located three miles east of the Nevada/California state line some two miles north of the intersection of Fish Springs Road in northern Washoe County, Nevada. The entire vicinity is dedicated to rural uses with the main improvement in the area being the railroad track which runs just north of the northern boundary of the project property. The nearest residences are located in Herlong, more than nine miles west of the project site. The current noise environment surrounding the project

property consists of noise contributed by the Union Pacific Railroad which runs just north of the project property.

3.9.2 Environmental Consequences

The following subsections discuss the environmental consequences from construction and operation of the Project.

Construction

Noise calculations suggest that the construction noise produced at the Project area would range around 100-110 dBA which would be temporary and would occur intermittently throughout the construction phase. However, because of the distance to the nearest residential area (9 miles) or sensitive receptor, noise levels perceived at that area would be less than 60 dBA, placing the effect of the construction noise from the proposed Project within acceptable noise levels for an agricultural or community utility site.

The project property is located more than nine miles from the nearest sensitive receptors, the site is also visually obstructed from said sensitive receptors by existing fencing, vegetation, buildings, and topographical features which would provide noise-reducing barrier or “shielding” effects. Additionally, the Project construction timeframes for these heavy equipment activities would be brief and would occur at small intervals over the Project construction timeframe, primarily during the first few weeks of site preparation and earthwork. See Table 11: Estimated Noise Levels. Estimated Noise Levels, below for likely construction noise levels to be generated by the proposed NVSolarWRX Project. Therefore, construction noise impacts would be temporary and less than significant.

Table 11. Estimated Noise Levels

Construction Equipment Noise Source	Typical Noise Level (dBA)	
	50 ft	100 ft
Pneumatic tools	85	79
Truck (e.g., dump, water)	84	78
Concrete mixer (truck)	85	79
Backhoe	80	74
Generator	82	76
Portable air compressor	80	74
Combined equipment	82	76

Source: Federal Transit Administration (2018)
Note: An assumed propagation rate is 6 dBA per doubling of distance.

Operation

To estimate proposed project operational noise levels, noise modeling completed for a separate, comparable project in El Centro, California, was utilized (Appendix D – El Centro BESS Project Noise Study). Operation of the air conditioning equipment used to cool the batteries was determined to be the dominant source of noise during operation of the proposed BESS/PSES facility. The El Centro BESS Project utilizes 12 air conditioning units to provide air conditioning for the battery units. The proposed Project would utilize a separate air conditioning unit for each of the battery storage enclosure (estimated at 8). However, the proposed Project would locate the air conditioning units within the interior of the storage enclosures. The air conditioning units at the El Centro BESS Project are located on the exterior of structures.

With the air conditioning units in operation, the El Centro Project was determined to produce noise of 80.8 dBA Leq at a distance of approximately 10 feet from BESS building (approximately 5 feet from an air conditioning unit). At a distance of approximately 100 feet from the building, but within direct line-of-sight of air conditioning units, noise was determined to be 61.6 dBA Leq. Which is consistent with the generally accepted standard for attenuation of noise of approximately 6 dBA per distance doubled.

During summer, when ambient air temperatures are exceedingly high, there would be potential for the air conditioning unit in each of the battery storage enclosures to operate concurrently. Based on the noise produced by the air conditioning units at the El Centro Project, 8 air conditioning units operating concurrently would be anticipated to produce a noise level of approximately 83 dBA Leq at a distance of approximately 10 feet when located in an exterior location with no barriers.

As described above, a barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dB of noise reduction. The proposed Project would locate air conditioning units within the fully enclosed battery enclosures, thereby creating a barrier which breaks the line of sight between the air conditioning units and receptors. Each battery enclosure would be insulated, which would further attenuate any noise emitted from within the enclosure. Insulation absorbs sound waves and adding insulation to metal construction can reduce noise by an additional 5 to 6 dB (North American Insulation Manufacturers Association 2015). Thus, when all air conditionings units operate concurrently within the insulated battery storage enclosures, noise levels would be approximately 73 dBA Leq at a distance of 10 feet from the enclosures. Using the doubling of distance attenuation rate of 6 dBA, project noises levels would attenuate to 43 dBA Leq at the northern parcel boundary which is approximately 50 feet from the proposed placement of air conditioning units (noise source) and 1 dBA Leq at the southern boundary. With the closest structure to the proposed project property located some 9 miles to the west, no additional noise will be contributed to nearby sensitive receptors.

As discussed above, the proposed Project will not contribute new levels of noise that could impact sensitive land uses surrounding the project property. In addition, the NVSolarWRX BESS/PSES facilities will comply with all local regulations and standards regarding noise. The project property is located within a large area zoned for rural/agricultural land uses and noise levels will remain compatible with said land uses. The proposed Project is compatible with the existing agricultural land uses in the area and will not create significant impacts regarding noise.

3.9.3 Mitigation Measures

Typical schedules during the construction phase would generally run from 7:00 am to 5:00 pm, Monday through Friday. This would ensure compliance with the local noise ordinance concerning construction which limits activity to daytime hours between 7:00 am to 7:00 pm. However, because of the distance to the closest sensitive noise receptors, strict adherence to this schedule is not required to avoid potential impacts.

3.10 WASTE MANAGEMENT AND HAZARDOUS MATERIALS

This section addresses potential site contamination issues-the use, handling and storage of hazardous and toxic substances and the generation and disposal of hazardous materials associated with the proposed construction and operations of the Project. Hazardous materials are substances that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may present a substantial danger to public health or the environment if released. In relation to this Project hazardous materials may include fuels, lubricants, and other liquid materials that would be used at the site during construction and operations. Non- hazardous solid waste refers to waste that is commonly discarded during everyday activities and for this Project may include construction debris, landscaping waste, and household waste from construction workers and operational staff.

3.10.1 Existing Setting

A Phase I Environmental Site Assessment (ESA) of the project property was conducted by Universal Engineering Sciences (UES) in December 2024 according to American Society for Testing and Materials (ASTM) Standard Practice E-1527-21. That study included a review of the site history, including ownership records and historical aerial photographs and topo maps; interviews with the developer; and review of environmental databases. The Phase 1 ESA revealed no evidence of recognized environmental conditions (RECs) or likely RECs on the project property itself or the surrounding vicinity.

The project property is vacant and relatively free of improvements. Improvements in the Project vicinity include the Union Pacific Railroad, the Tuscarora gas line and the Alturas Interconnection Transmission Line. No observations were made of indicators of the likely presence of hazardous materials or past releases of the same on the project property, including the presence of storage tanks, barrels, or drums; stained or discolored soil, unusually stressed vegetation; odors, sheens, or similar.

3.10.2 Environmental Consequences

The construction of the Project would generate solid waste in the form of soil and brush from clearing and grubbing, as well as materials from installation of the project

substation, PV panels, gen-tie, BESS, and access driveway. Solid waste generated during construction would be transported for disposal at a licensed waste management facility. The operation of the Project is expected to generate limited amounts of solid waste stemming from routine maintenance activities. Any waste generated because of these activities would be disposed of at a licensed waste management facility.

The construction and operation of the Project is not expected to require the transportation, use, or generation of hazardous materials or hazardous wastes that could create a potential hazard to the public or environment. The types of materials that would potentially be present during construction would be minimal volumes of vehicle fuels, lubricating oils, paints, adhesives, and sealants. The ordinary use of these materials would not generate hazardous wastes. As the construction contractors would be required to comply with environmental and workplace safety laws and procedures, no substantive risks to public health and safety are expected from the proposed action.

3.10.3 Mitigation Measures

The following BMP and mitigation measures are to be implemented to prevent and reduce potential impacts associated with hazardous waste:

- Spill cleanup kits would be available on construction equipment and vehicles so that spills or leaks of vehicle fluids would be quickly cleaned up for proper disposal.
- Construction sites, material storage yards, and access roads would be kept in an orderly condition throughout the construction period.
- Refuse and trash, including stakes and flags, would be removed from the project and disposed of in an approved manner.
- No construction equipment oil or fuel would be drained on the ground.
- Oils or chemicals would be hauled to an approved site for disposal. No open burning of construction trash would occur.
- An operational Environmental Health and Safety Plan would be prepared for the Project. The Safety Plan would outline all Project activities, identify the hazardous substances and chemicals used at the site, and ensure compliance with OSHA Standards, the

Nevada Division of Industrial Relations requirements, and all other local, state, and federal regulatory requirements. The Safety Plan would identify site-specific safety control measures, site health and safety roles and responsibilities, speed limits, and site safety hazards and controls.

- A Solid and Hazardous Waste Management Plan would be prepared and implemented for both construction and operation of the Project. Included in the solid and hazardous waste management plans would be stipulations and procedures regarding compliance with federal, state, and local regulations for waste minimization, storage, and disposal. The construction contractor shall prepare BMPs that describe the methods for working with hazardous materials during construction.

3.11 SOCIOECONOMICS

This section describes the socioeconomic issues related to the proposed NVSolarWRX Project.

3.11.1 Existing Setting

The Project site is in the undeveloped, uninhabited, and rural area that Washoe County, Nevada. The nearest inhabited area is over 9 miles from the Project site. As of July 1, 2022, the population of Washoe County was estimated at 496,745 people. The population density of the county is 77 persons per square mile. Approximately 42 percent of the population identifies as a racial minority, consisting of 26.2 percent Hispanic or Latino, 2.3 percent American Indian or Alaska Native, 6.3 percent Asian, 3.0 percent Black or African American, and 4.2 percent identified as two or more races (U.S. Census Bureau 2012a). There are 218,178 housing units available in Washoe County, of which 58.6 percent are owner-occupied (U.S Census Bureau 2022a).

Median income for a household in the Washoe County in 2022 was $80,125 and the County's poverty rate in 2022 was 10.2 percent. Total employment for Washoe County as of 2022 was 62.7 percent, and the three largest industries were Educational services, and health care and social assistance (16.9 percent); Arts, entertainment, and recreation, and accommodation and food services (12.9 percent); and Professional, scientific, and management, and administrative and waste management services (12.4percent) (U.S Census Bureau 2022b).

Environmental Justice

The USEPA defines a community with potential environmental justice populations as one that has a higher proportion of minority or low-income populations than does an identified reference community. An environmental justice assessment requires an analysis of whether low-income or poverty populations would be disproportionately and adversely affected by a Project. For this analysis, "minority" includes all racial groups other than "white, not Hispanic or Latino." Low-income populations are defined as those individuals that are considered living below poverty levels, as defined by the U.S. Census Bureau. The U.S. Census

Bureau defines poverty level thresholds for individuals and a family of four as income levels below $15,852 and $31,428, respectively (U.S. Census Bureau, 2024). Populations in either group are considered significant if their share of the population is more than ten percentage points higher than the minority/low-income population's share of the state and the county. Table 12 shows that Washoe County has a higher proportion of white, non-Hispanic residents and lower proportions of low-income residents when compared to those in Nevada. The Project is in Census Tract 35.01 which is less racially diverse than both the Washoe County and the State of Nevada with no minority group exceeding the proportions of the State or County and a poverty level consistent with the countywide metric but below that of the State.
(https://data.census.gov/profile/Census_Tract_35.01;_Washoe_County;_Nevada?g=1400000US32031003501)

Table 12. 2010 Race, Ethnicity and Low-Income Indicators

Environmental Justice Indicator	Nevada	Washoe County	Census Tract 003501
White, Non-Hispanic	45.7%	59%	70%
Black	10.8%	6%	1%
American Indian and Alaska Native	1.7%	2%	2%
Asian	9.4%	6%	1%
Native Hawaiian and Other Pacific Islander	0.9%	1%	0%
Two or More Races	5.1%	13%	8%
Hispanic or Latino, Total	30.3%	25%	10%
Persons below poverty line	12.5%	10.2%	10.9%

Source: U.S. Census Bureau 2020 Decennial Census

3.11.2 Environmental Consequences

The Project would generate temporary employment during construction of the solar field, substation, and gen-tie line. The construction of the solar field and associated facilities is anticipated to employ approximately 200 workers during peak activity. Construction would be underway for approximately 7 months, depending on various contingencies with potential do delay and/or extend this period.

Temporary construction jobs would bring employment and income to Washoe County. It is expected that the construction workers would primarily be residents in Washoe County, NV, or Lassen County, CA. However, a small amount of workforce is expected to require specialty skills and would either relocate to the region temporarily or permanently, including staying in hotels/motels, apartments, or purchasing a home. Thus, population is expected to grow at least temporarily by up to 100 individuals over the duration of the construction phase, representing a very minor impact on population and temporary housing. The temporary employment would bring income to the region, which would support other businesses in the area. Workers spend their income on food services, transportation services, accommodations, retail stores, medical services, and other services and products. As worker spending rolls through the local economy, it supports additional jobs and income in the area. Additionally, the state of Nevada as well as Washoe County is expected to gain from sales and property tax receipts from the successful construction and operation of the Project.

The analysis indicates that the Project would be located in a Census Tract that is consistent with the general demographic distribution of the population of Washoe County. However, based on review of satellite imagery, only about 20 structures or trailers exist within a 5-mile radius of the project site boundaries. Therefore, very few people live adjacent to or near the site (under 5 miles); therefore, no environmental justice populations would be unduly affected. Additionally, construction and operation of the Project would not have long-term or adverse health or environmental impacts, and therefore there would not be disproportionate and adverse effects to these residents.

3.11.3 Mitigation Measures

Potential impacts to socioeconomic conditions may be beneficial, and therefore no mitigation is required.

4.0 LIST OF PREPARERS AND REVIEWERS

This section provides the name, qualifications, professions, and contact information of each person with primary responsibility for the preparation of the environmental statement and of each person who has provided comments or input in the preparation of the statement.

Name	Title	Project Role	Email
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Appendix A – Phase I Environmental Assessment Report

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Proposed Solar Project
APNs 074-103-01, 074-103-05, 074-451-20, and 074-452-01
Washoe County, Nevada
UES Project No. UES082

Report Issuance Date: December 20, 2024
Report Viability Date: June 3, 2025

Prepared for:

NVSolarWRK, LLC

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Grounded in Excellence

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GLOSSARY OF ENVIRONMENTAL ACRONYMS

AAI - All Appropriate Inquiry
AST - Aboveground Storage Tank
ASTM - American Society for Testing and Materials
AUL - Activity and Use Limitations
B/VCP - Brownfields/Voluntary Cleanup Program
BGS - Below Ground Surface
CERCLA - Comprehensive Environmental Response, Compensation and Liability Act
CESQG - Conditionally Exempt Small Quantity Generator
COC - Chemicals of Concern
CREC - Controlled Recognized Environmental Condition
CORRACTS - Corrective Action Report
DRO - Diesel Range Organics
ECHO - U.S. EPA Enforcement and Compliance History Online
EDR - Environmental Data Resources, Inc.
EP - Environmental Professional
ERNS - Emergency Response Notification System
ESA - Environmental Site Assessment
FINDS - Facility Index System
FUDS - Formerly Used Defense Site
GRO - Gasoline Range Organics
HA- Health Advisories
HREC - Historical Recognized Environmental Condition
LQG - Large Quantity Generator
LUST - Leaking Underground Storage Tank
MINES - Mines Master Index File
MCL - Maximum Contaminant Level
NDEP - Nevada Division of Environmental Protection
NFA - No Further Action
NNPH - Northern Nevada Public Health
NPDES - National Pollution Discharge Elimination System
NPF - Nevada Petroleum Fund
NPL - National Priority List
ORO - Oil Range Organics
PAH - Polycyclic Aromatic Hydrocarbons

PCB - Polychlorinated Biphenyl

PCE - tetrachloroethene/perchloroethylene

PID - Photoionization Detector

REC - Recognized Environmental Condition

RCRA - Resource Conservation and Recovery Act

ROD - Record of Decision

SHWS - State Hazardous Waste Site

SQG - Small Quantity Generator

SWF/LS or SWF/LF - Solid Waste Facility/Landfill Site

TPH - Total Petroleum Hydrocarbons

UES - McGinley and Associates, Inc. dba UES

USGS - United States Geological Survey

USEPA - United States Environmental Protection Agency

UST - Underground Storage Tank

VCP - Voluntary Cleanup Program

VOC - Volatile Organic Compound

VEC - Vapor Encroachment Condition

VES - Vapor Encroachment Screening

VSQG - Very Small Quantity Generator

EXECUTIVE SUMMARY

This report presents the findings of a Phase I Environmental Site Assessment (ESA) performed on the unaddressed property identified by Washoe County as Assessor Parcel Numbers (APNs) 074-103-01, 074-103-05, 074-451-20, and 074-452-01, located in Washoe County, Nevada. McGinley and Associates, Inc. dba UES (UES) conducted this Phase I ESA for the purpose of identifying recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), and/or controlled recognized environmental conditions (CRECs) on the subject property in accordance with the 2023 ASTM International standard practice for the performance of Phase I Environmental Site Assessments for Forestland or Rural Properties (ASTM E2247-23). The United States Environmental Protection Agency (USEPA) has endorsed this practice as satisfying the requirements of All Appropriate Inquiry (AAI). UES performed this work for NVSolarWRX, LLC (User). Any exceptions to, or deletions from, this practice are described in Section 9.0 of this report.

General Findings

- *The subject property is comprised of approximately 1,679.94 acres of generally vacant land.*
- *The subject property appears to have consisted of undeveloped land with intermittent drainage channels, playa land, and unimproved roadways from 1954 to 2019. By 2023, the southeast portion of the subject property was graded with a small unimproved airstrip developed.*
- *The subject property was not identified as a record in the databases searched by Environmental Data Resources, Inc. (EDR) and the Nevada Division of Environmental Protection (NDEP).*
- *According to the information provided by the Northern Nevada Public Health (NNPH) and Nevada Division of Water Resources (NDWR), APNs 074-103-01 and 074-452-01 are equipped with three irrigation groundwater wells with static groundwater levels reported between 20 and 30 feet below ground surface (bgs). These wells were not able to be field verified during the site reconnaissance and the existing conditions of the wells are unknown.*
- *At the time of the site reconnaissance, no permanent structures were observed on the subject property. Due to lack of access roads, mountainous terrain, dense vegetation and/or private property access constraints, several areas of the subject property were not readily accessible. However, UES attempted to view the inaccessible areas from a distance. The majority of the subject property consisted of undeveloped land with the exception of the southeast portion. The southeast portion of the subject property consisted of partially graded land with temporary storage structures, bulk storage containers, construction equipment, and various materials. Portions of the graded land appeared to be associated with a small unimproved airstrip and unimproved roadways. Evidence of stained soil along the air strip were not observed during site reconnaissance. The bulk storage containers consisted of multiple water holding tanks and one*

automatic transmission fluid tote. The tote and construction equipment appeared to be in good condition with no evidence of staining or releases. Other features on the subject property included natural drainages, access road/paths, and areas of natural vegetation. Scattered areas of windblown debris were observed across the subject property. The debris appeared to consist of paper, cardboard, and other miscellaneous litter. Evidence of dumped petroleum products or hazardous substances was not observed during the site reconnaissance.

Recognized Environmental Conditions (RECs)

- *No RECs were identified in connection with the subject property.*

Historical Recognized Environmental Conditions (HRECs)

- *No HRECs were identified in connection with the subject property.*

Controlled Recognized Environmental Conditions (CRECs)

- *No CRECs were identified in connection with the subject property.*

Vapor Encroachment Conditions (VECs)

- *No VECs were identified in connection with the subject property.*

Business Environmental Risks (BERs)

- *No BERs were identified in connection with the subject property.*

Conclusions

Upon conclusion of our Phase I ESA, and based on the information reviewed, this assessment has revealed no evidence of RECs, HRECs, CRECs, VECs, or BERs in connection with the subject property. Based on the information reviewed for this assessment, UES is of the opinion that additional environmental investigations at the subject property are not warranted at this time.

1.0 INTRODUCTION

1.1 Purpose

This report presents the findings of a Phase I ESA performed on the unaddressed property identified by Washoe County as Assessor Parcel Numbers (APNs) 074-103-01, 074-103-05, 074-451-20, and 074-452-01, located in Washoe County, Nevada, and hereafter referred to as the subject property. McGinley and Associates, Inc. dba UES (UES) conducted this Phase I ESA for the purpose of identifying recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), and/or controlled environmental conditions (CRECs) on the subject property in accordance with the 2023 ASTM International standard practice for the performance of Phase I Environmental Site Assessments for Forestland or Rural Property (ASTM E2247-23). The U.S. Environmental Protection Agency (EPA) has endorsed this practice as satisfying the requirements of All Appropriate Inquiry (AAI). Definitions of REC, CREC, HREC, Vapor Encroachment Condition (VEC), and Business Environmental Risk (BER) are presented below.

- **REC:** (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment. The term REC is not intended to include *de minimis* conditions which are conditions related to a release that generally do not present a threat to human health or the environment and which generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. ASTM clarifies that the term "likely" means a condition *"which is neither certain nor proved but can be expected or believed by a reasonable observer based on the logic and/or experience of the environmental professional, and/or available evidence, as stated in the report to support the opinions given."*

- **CREC:** A REC affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations).

- **HREC:** A previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory

authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations). A HREC is not a REC.

- **VEC:** the presence or likely presence of "chemical of concern" vapors in the subsurface of the subject property caused by the release of vapors from contaminated soil or groundwater or both either on or near the subject property as identified by the Tier 1 or Tier 2 procedures.

- **BER:** a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice.

1.2 Scope of Work

The scope of work performed, and procedures utilized included the following tasks:

- Subject property reconnaissance and observation of adjoining properties and vicinity by a qualified person under the direct supervision of an Environmental Professional (EP);
- Environmental and physical setting review to assess geologic, hydrogeologic, hydrologic and topographic characteristics of the subject property, and to determine potential pathways for the migration of contaminants including solids and liquids at the surface or subsurface, and vapor in the subsurface;
- Review of subject property history/land use through city directory listings, historical aerial photographs, historical topographic maps, fire insurance maps (if ascertainable), local jurisdiction records, and personal interviews/questionnaires;
- Review of regulatory agency records to identify and assess any listings of regulatory permits, registrations, or enforcement actions at the subject property, adjoining properties, or proximal sites (if necessary), through both a commercial database search and agency inquiries;
- Interview with the User to obtain various User-required information about the subject property as required under the ASTM standard and the AAI rule;
- Interviews with the Owner and various agencies to ascertain past and current uses of the subject property, adjoining properties or the surrounding area which may provide information about the subject property history and assist in identifying RECs, HRECs and CRECs;
- Preparation of this report that describes all work performed and presents a discussion of the findings and conclusions.
- The scope of services does not include soil or groundwater sampling, or an evaluation of asbestos containing building materials, lead based paint, lead in drinking water, regulatory compliance, cultural and historical resources, industrial hygiene, health and safety, ecological

resources, indoor air quality, mold, radon, geotechnical exploration (soils, foundations, site retention, etc.), wetlands, endangered species, ecological resources, methane, geotechnical exploration, or construction materials testing, unless specified in the approved contract between UES and the client. UES can provide these additional services if necessary. In accordance with ASTM E1527-21, Section 13.1.5, assessment of such non-scope considerations is not required for AAI as defined in the standard practice.

1.3 Conditions of Contract

UES performed this work for NVSolarWRX, LLC (User) pursuant to our proposal. It is our understanding that this Phase I ESA was conducted as an environmental due diligence effort in connection with prospective development.

1.4 Significant Assumptions

This Phase I ESA was conducted in accordance with the assumptions and limitations contained within ASTM Standard Practice for Environmental Site Assessments - Phase I Environmental Site Assessment Process for Forestland or Rural Property, ASTM E2247-23.

As stated in ASTM E2247-23 Section 4.5.1, no environmental site assessment can wholly eliminate uncertainty regarding the potential for RECs in connection with a subject property. This Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a subject property and recognizes reasonable limits of time and cost.

Additionally, portions of this Phase I ESA are based on unverified information supplied to UES by third-party sources. In accordance with ASTM E2247-23 Section 7.5.2.1, an EP is not required to verify independently the information provided by third-party sources, unless the EP has actual knowledge that the information is incorrect, or unless it is obvious that certain information is incorrect based on other information obtained in the Phase I ESA.

1.5 User Reliance

This report is an instrument of service prepared by UES for the exclusive use of NVSolarWRX, LLC. No party other than NVSolarWRX, LLC is permitted by UES to rely on this instrument. With the permission of NVSolarWRX, LLC, UES will meet with a third party to help identify the additional services required, if any, to permit such third party to rely on the information contained in this report, but only to the same extent of NVSolarWRX, LLC reliance, and subject to the same contractual, technological, and other limitations to which NVSolarWRX, LLC has agreed. The findings

of this Phase I ESA are based on the completeness and accuracy of the data and observed conditions of the subject property as of the indicated property reconnaissance date, and when publicly available information was obtained as described in this report.

1.6 Critical Dates - Continued Viability of ESA

Due to changing environmental regulatory conditions and potential on-site or adjacent activities occurring after this Phase I ESA, the Client may not presume the continuing applicability of the conclusions in this assessment to the subject property for more than 180 days prior to the date of acquisition of the property or (for transactions not involving an acquisition) the date of the intended transaction. If within this period the assessment will be used by a User different from the User for whom the assessment was originally prepared, the subsequent User must also satisfy the User's Responsibilities. An environmental site assessment meeting or exceeding this practice and for which the information was collected or updated within one year prior to the date of acquisition of the property or (for transactions not involving an acquisition) the date of the intended transaction may be used provided that the following components of the inquiries were conducted or updated within 180 days of the date of purchase or the date of the intended transaction.

CRITICAL DATES

PHASE I ESA COMPONENT	DATE
Date of Declaration by the Environmental Professional for the Assessment or Update	December 20, 2024
Earliest Date of Interviews with Owners, Operators, and Occupants	December 12, 2024
Date of Search for Recorded Environmental Liens	Not provided by the User (See Section 4.3)
Date of Federal, Tribal, State and Local Records Review	December 5, 2024 - December 11, 2024
Date of Site Reconnaissance of the Subject Property and Adjoining Properties	December 13, 2024
Report Viability Date	June 3, 2025

1.7 Limitations

Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with the subject property. Please refer to the Limitations Appendix for a summary of report limitations.

2.0 SUBJECT PROPERTY DESCRIPTION

A description of the subject property, location and vicinity characteristics are summarized in the table below. Refer to the Site Location Map (**Figure 1**) and the Site Plan (**Figure 2**) for additional details pertaining to the subject and adjoining properties.

Subject Property Location, Description, and Vicinity Characteristics

Physical Street Address(es)	Unaddressed
Acreage	1,679.94
Property Identification No.	074-103-01, 074-103-05, 074-451-20, and 074-452-01
Public Land Survey System	Township 26 North and Range 18 East
Current Ownership	Robert Simmons et al (NVSolarWRX, LLC a subsidary of RBK Industries, LLC)
Current Use	Vacant
Land Use	Vacant, single family
Zoning	Washoe County - General Rural
Legal Description	Not available per Washoe County Assessor
Vicinity Characterization	Vacant land

3.0 PHYSICAL SETTING RESOURCES

USGS topographic quadrangle maps, soil survey data, available regulatory files, and other reasonably ascertainable records regarding properties of environmental concern in the subject property vicinity were reviewed as sources for obtaining information regarding the physical setting of the subject property and surrounding vicinity and are summarized in the table below. Copies of the most recently available USGS topographic maps are provided in the Topographic Maps Appendix.

Summary of Physical Setting Sources

Topography:

Subject Property Elevation	3,980 to 3,995 feet above mean sea level
Topographic Gradient	Generally flat, slopes to the southeast
Closest Surface Water	The subject property includes several natural drainages which facilitate stormwater runoff. The nearest major surface water body is Pyramid Lake which is located approximately 11 miles east.

General Soil Characteristics:

Soil Type	The surficial soils found at the subject property have been mapped as Gitakup and Typic Udorthents silty clay loam.
Description	The Gitakup unit is classified as hydrologic soil group C, which is characterized by moderately high runoff potential when thoroughly wet as water transmission through the soil is somewhat restricted. The Typic Udorthents unit is classified as hydrologic soil group D, which is characterized by high runoff potential when thoroughly wet as water movement through the soil is restricted to very restrictive (NRCS, 2016).

Area Specific Geology/Hydrogeology Characteristics:

Geology	The geology underlying the subject property has been mapped primarily as Playa, lake bed, and flood plain deposits of quaternary sediments and rocks.
Groundwater Depth	20 to 30 feet below ground surface based on the groundwater logs on the subject property. See Sections 6.5 and 6.6.
Groundwater Direction	Groundwater flow direction at the subject property is understood to be variable based on topography.

4.0 USER PROVIDED INFORMATION

4.1 General

The ASTM Standard defines a User as "the party seeking to use Practice E1527 to complete an environmental site assessment. A User may include, without limitation, a potential purchaser of property, a potential tenant of property, an owner of property, a lender, or a property manager." The User has specific obligations for completing a successful application of this practice as outlined in Section 6 of the ASTM Standard Practice E2247-23.

In order to qualify for one of the Landowner Liability Protections (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the "Brownfields Amendments"), the User must complete an AAI compliant user questionnaire and provide it to the environmental professional. Failure to complete this user questionnaire could result in a determination that "all appropriate inquiry" is not complete. The questionnaire determines a baseline of User knowledge of the subject property regarding the following items:

1. Environmental cleanup liens that are filed or recorded against the subject property (40 CFR 312.25);
2. Activity and land use limitations that are in place on the site or have been filed or recorded in a registry (40 CFR 312.26);

3. Specialized knowledge or experience of the person seeking to qualify for the LLP related to the subject property or nearby properties (40 CFR 312.28);
4. Relationship of the purchase price to the fair market value of the subject property if it were not contaminated (40 CFR 312.29);
5. Commonly known or reasonably ascertainable information about the subject property (40 CFR 312.30); and
6. The presence or likely presence of contamination in, on, or at the subject property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).

A User Questionnaire was supplied to a representative of the User on December 10, 2024 by UES. A copy of the completed User Questionnaire is included in the User Questionnaire Appendix.

4.2 Reason for Performing Phase I ESA

UES was contracted to perform this Phase I ESA in order for the prospective owner to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser defense to CERCLA liability. It is our understanding that this Phase I ESA was conducted as an environmental due diligence effort in connection with prospective development.

4.3 Environmental Liens or Activity and Use Limitations

Information pertaining to potential environmental liens or activity and use limitations on the subject property that are filed or recorded under federal, tribal, state, or local laws was not supplied by the User. Please note that an environmental liens or activity and use limitations search was not performed for the subject property. In accordance with ASTM E2247-23, it is the responsibility of the User of this report to confirm that there are no environmental liens or activity and use limitations filed for the subject property. In the event that any are identified, please contact UES immediately for further evaluation.

5.0 HISTORICAL RECORDS REVIEW

A historical assessment of the subject property, adjoining properties and surrounding area was performed through a review of available standard historical resources including aerial photographs, topographic maps, fire insurance maps, and city directory records. Additional standard historical sources were reviewed if deemed useful in identifying RECs and readily available. These sources are cited in the table below.

Standard Historcial Sources	Reviewed	Source
Aerial Photographs	Yes	EDR
USGS Topographic Maps	Yes	EDR
Fire Insurance Maps	No	Coverage for the subject property were not available per EDR
City Directories	Yes	EDR
Property Tax Files	Yes	Washoe County Assessor Records
Recorded Land Title	No	Not provided by User
Building Department Records	No	EDR

A summary of the aerial photographs and topographic maps reviewed is presented in the table below.

Summary of Historical Land Use Records

Year	Subject Property	Adjoining Properties	Source
1954-1974	Undeveloped land with intermittent drainage channels and playa land	**North**: Undeveloped land with intermittent drainage channels **East**: Undeveloped land with intermittent drainage channels and playa land **South**: Undeveloped land with intermittent drainage channels and playa land **West**: Undeveloped land with intermittent drainage channels	Aerial Photographs and Topographic Maps
1980-2019	Undeveloped land with intermittent drainage channels, unimproved roadways, and playa land	**North**: Undeveloped land with intermittent drainage channels and unimproved roadways **East**: Undeveloped land with intermittent drainage channels, unimproved roadways, and playa land **South**: Undeveloped land with intermittent drainage channels, unimproved roadways, and playa land **West**: Undeveloped land with intermittent drainage channels and unimproved roadways	Aerial Photographs and Topographic Maps

Year	Subject Property	Adjoining Properties	Source
2023	Graded land including an unimproved airstrip developed on the southeast portion of the property	**North**: Undeveloped land with intermittent drainage channels and unimproved roadways **East**: Undeveloped land with intermittent drainage channels, unimproved roadways, and playa land **South**: Undeveloped land with intermittent drainage channels, unimproved roadways, and playa land **West**: Undeveloped land with intermittent drainage channels and unimproved roadways	Google Earth Imagery

5.1 Historical City Directories

UES reviewed city directories to evaluate the previous land uses of the subject property and surrounding area. At the request of UES, EDR searched city directory listings for Fish Springs Road. As the subject property is unaddressed, listings associated with the site were not identified. Adjoining property listings appear to have included various private tenants. The city directory findings are provided in the Aerial Photographs, Topographic Maps, Sanborn Fire Insurance Maps and City Directories Appendix.

5.2 Property Tax Records

According to the Washoe County Assessor reports, the current owner of the subject property is Robert Simmons et al (NVSolarWRX, LLC a subsidary of RBK Industries, LLC). It appears that this entity has owned the subject property since at least 2021. Previous property owners listed include Babylon Holdings LLC (2011-2021), Cedars of Lebanon Mt Sina Hos (2011). Ownership records prior to 2011 were not provided in the information available for review. The subject property zoning is listed as *Washoe County - General Rural*. The land use code for the subject property is listed as *Vacant, single family*. Additional information is contained in the Assessors Map and Parcel Information Appendix.

5.3 Recorded Land Title Records

The User did not contract UES to acquire a chain-of-title report for the subject property, which typically contains information regarding historical site ownership.

5.4 Building Department Records

UES did not review building department records in preparation of this Phase I ESA as the subject property is vacant land and building records associated with the subject property were not identified by EDR.

6.0 RECORDS REVIEW

6.1 Standard Environmental Record Sources

A regulatory agency review was conducted through both a commercial database search and local agency inquiries. The purpose of the records review is to obtain and review records that may preclude RECs in connection with the subject property. Accuracy and completeness of record information varies among information sources, including governmental sources, and may be inaccurate or incomplete. UES obtained an ASTM regulatory database report from EDR, which is provided in the Radius Map Report Appendix. Standard sources that are reasonably ascertainable were reviewed by UES for this Phase I ESA.

UES also reviewed the "unmappable" (commonly referred to as "orphan") listings within the database report, cross-referencing available address information and facility names. Unmappable sites are listings that could not be plotted with confidence but are potentially in the general area of the property, based on the partial street address, city, or zip code. Any unmappable site that was identified by UES as being within the approximate Minimum Search Distances (MSDs) from the subject property, based on the site reconnaissance and/or cross-referencing to mapped listings is included in the discussion within this section.

The following table lists the approximate MSDs used during this assessment in review of the regulatory database, as set forth in ASTM E2247-23.

MSDs - ASTM E1527-21

Source	Search Distance
Federal NPL Site List (National Priorities List)	1.0 mile
Federal Delisted NPL Site List	0.5 mile
Federal CERCLIS List (Comprehensive Environmental Response Compensation and Liability Act of 1980) / Superfund Enterprise Management System (SEMS)	0.5 mile
Federal CERCLIS NFRAP Site List /SEMS Archive List	0.5 mile

Source	Search Distance
Federal RCRA CORRACTS Facilities List (Resource Conservation and Recovery Act)	1.0 mile
Federal RCRA non-CORRACTS TSD Facilities List	0.5 mile
Federal RCRA Generators List	subject property & adjoining parcels
Federal Institutional Control/Engineering Control Registries	subject property only
Federal ERNS List (Emergency Response Notification System)	subject property only
State and Tribal Lists of Hazardous Waste Sites identified for investigation or remediation: State- and Tribal-equivalent NPL State- and Tribal-equivalent SEMS	 1.0 mile 0.5 mile
State and Tribal Landfill and/or Solid Waste Disposal Site Lists	0.5 mile
State and Tribal Leaking Storage Tanks Lists	0.5 mile
State and Tribal Registered Storage Tank Lists	subject property & adjoining parcels
State and Tribal Institutional Control/Engineering Control Registries	subject property only
State and Tribal Voluntary Cleanup Sites	0.5 mile
State and Tribal Brownfield Sites	0.5 mile

UES reviewed available regulatory records pertaining to the subject property, adjoining parcels, and surrounding properties, as warranted. To evaluate which of the adjoining and nearby sites identified in the regulatory database report present potential environmental risks to the subject property, UES considered the following criteria:

- The type of database on which the site is identified.
- The direction and distance of the identified site from the subject property.
- The known or inferred groundwater flow direction in the subject property area.
- The status of any respective regulatory agency-required investigation(s) of the identified site.
- Surface and subsurface obstructions and diversions (e.g., buildings, roads, sewer systems, utility service lines, rivers, lakes, and ditches) that may be located between the identified site and the subject property.

The subject property and adjoining properties were not identified as records in the databases searched by EDR.

6.2 Vapor Encroachment Screening

The purpose of a Vapor Encroachment Screening (VES) is to identify VECs to the extent feasible pursuant to the procedures presented in the Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transaction (ASTM E2600-22). The VES is intended to be used independently or in conjunction with, but not as a replacement of, existing Practice E2247-23 Phase I ESA.

Vapor migration refers to the movement of hazardous substance or petroleum product vapors in the subsurface. A VEC is defined as the presence or likely presence of chemicals of concern (COC) vapors in the subsurface of the subject property caused by the release of vapors from contaminated soil and/or groundwater either on or near the subject property.

UES conducted a Tier 1 VES for the subject property in accordance with ASTM E 2600-22. The Tier 1 screening process utilizes the information collected as part of this Phase I ESA. The Area of Concern (AOC) for the purpose of this VES is 1/3 mile (1,760 feet) for hazardous substance COCs and 1/10 mile (528 feet) for petroleum hydrocarbon COCs. The approximate minimum search distances for Federal, Tribal and State-listed facilities surrounding the subject property are presented in the table below.

Approximate MSDs Surrounding the Subject Property (ASTM E2600-22)

Source	COC	Petroleum Hydrocarbon COC
Federal NPL Site List	1/3 mile	1/10 mile
Federal SEMS List	1/3 mile	1/10 mile
Federal RCRA CORRACTS Facilities List	1/3 mile	1/10 mile
Federal RCRA Non-CORRACTS TSD Facilities List	1/3 mile	1/10 mile
Federal RCRA Generators List	Subject property only	Subject property only
Federal Institutional Control/Engineering Control Registries	Subject property only	Subject property only
Federal ERNS List	Subject property only	Subject property only
State and Tribal Equivalent NPL	1/3 mile	1/10 mile
State and Tribal Equivalent SEMS	1/3 mile	1/10 mile
State and Tribal Landfill and/or Solid Waste Disposal Site Lists	1/3 mile	1/10 mile
State and Tribal Leaking UST/AST Lists	1/3 mile	1/10 mile
State and Tribal UST/AST Lists	Subject property only	Subject property only

Source	COC	Petroleum Hydrocarbon COC
State and Tribal Institutional Control/Engineering Control Registries	Subject property only	Subject property only
State and Tribal Voluntary Cleanup Sites	1/3 mile	1/10 mile
State and Tribal Brownfield Sites	1/3 mile	1/10 mile

Based on the EDR VES, facilities with known or suspected contamination are not located within the AOC; therefore, no VECs were identified in connection with the subject property. A copy of the EDR VES report is presented in the Vapor Encroachment Screen Appendix.

6.3 Previous Environmental Reports

Previous ESAs or other environmental reports prepared for the subject property were not provided by the User and were not identified in the public records reviewed within the scope of this report.

6.4 Nevada Division of Environmental Protection (NDEP)

The regulatory agency review did not identify regulatory sites administered by the NDEP that could potentially impact the subject property. Therefore, agency files from the NDEP were not requested for review.

6.5 Northern Nevada Public Health

On December 10, 2024, an inquiry regarding inspections, complaints, spills, USTs, or other potential environmental issues in connection with the subject property was submitted via electronic mail to NNPH. On December 11, 2024, NNPH personnel replied by email indicating that their office did not identify responsive records for the subject property with the exception of three well permits for the subject property. More information regarding these wells is included in Section 6.6.

6.6 Nevada Division of Water Resources (NDWR)

The Nevada Division of Water Resources (NDWR) Well Log Database was reviewed. According to the information reviewed it appears three irrigation groundwater wells are located on the subject property (well log nos. 20383, 20384, 20385). The wells were installed in 1979 for Gary Lee Tope, a previous owner of the subject property. The wells were drilled to a depth between 200 and 298 feet and static groundwater was encountered between 20 and 30 feet below ground surface (bgs). According to the well logs and the well permits provided by the NNPH, the wells are located on

APNs 074-103-01 and 074-452-01. The wells were not able to be field verified during the site reconnaissance. The well logs and permits are included in the Supporting Documentation Appendix.

7.0 SITE RECONNAISSANCE

On December 13, 2024, a site reconnaissance of the subject property was completed by Leo Karcz of UES. UES was unescorted during site reconnaissance. The purpose was to evaluate the current conditions of the subject property and to obtain information indicating the likelihood of identifying RECs in connection with the subject property.

The general subject property setting is characterized primarily by vacant land with a small portion graded. At the time of UES's site reconnaissance, the subject property was comprised of vacant land with a small portion of the subject property graded and improved with temporary structures.

7.1 Methodology

The reconnaissance included walking the accessible portions of the subject property and the subject property perimeter. This visual observation of the subject property focused primarily on its surface features. Adjoining properties were observed from curbside or property boundaries. Photographs taken during the site reconnaissance are provided in the Photographs Appendix.

SITE RECONNAISSANCE INFORMATION

INSPECTORS	Leo Karcz
SITE RECONNAISSANCE DATE/TIME	December 13, 2024
WEATHER CONDITIONS	Cloudy and cold
ASSESSMENT SITE CONTACT/TITLE	No onsite contact - Vacant Land
LIMITATIONS ENCOUNTERED	Lack of traversable roads in some areas of the subject property limited UES's access

7.2 Observations During Reconnaissance

Please refer to the Site Reconnaissance Summary Table below for observations made by UES during the reconnaissance.

SITE RECONNAISSANCE SUMMARY

ITEM	OBSERVED	COMMENTS
Potable Water Supply/Source	No	
Sewage Disposal System	No	
Hazardous Substances and Petroleum Products in Connection with Identified Uses	Yes	One tote of automatic transmission fluid observed
Storage Tanks (Includes aboveground storage tanks, or underground storage tanks, vent pipes, fill pipes, or access ways indicating underground storage tanks at the subject property)	No	
Strong, Pungent, or Noxious Odors/Source	No	
Drums, Totes, and Intermediate Bulk Containers	Yes	One tote of automatic transmission fluid observed and two water holding tanks
Standing Surface Water and Pools or Sumps Containing Liquids Likely to be Hazardous Substances of Petroleum Products	No	
Hazardous Substances and Petroleum Products Containers Not in Connection With Identified Uses	No	
Unidentified Substance Containers	No	
Polychlorinated Biphenyls (PCB)-Containing Items (Electrical or hydraulic equipment known to contain PCBs or likely to contain PCBs. Fluorescent light ballasts, caulk, paint, or other materials that may contain PCBs, and are located inside and are part of the building or structure, are outside the scope of this assessment)	No	
Heating/Cooling Systems (The means of heating and cooling the building(s) on the subject property, including the fuel source)	No	
Stains or Corrosion on Floors, Walls, or Ceilings (except for staining from water)	No	
Drains and Sumps	No	

ITEM	OBSERVED	COMMENTS
Pits, Ponds, or Lagoons (manmade or natural depressions in a ground surface that are likely to hold liquids or sludge containing hazardous substances or petroleum products)	No	
Stained Soil or Pavement	No	
Stressed Vegetation (from something other than insufficient water)	No	
Solid Waste (Areas that are apparently graded by non-natural causes (or filled with fill of unknown origin) suggesting trash, construction debris, demolition debris, or other solid waste disposal; and mounds or depressions suggesting trash or other solid waste disposal)	No	
Waste/Wastewater (Wastewater or other liquid (including stormwater) discharged from or to the subject property)	No	
Wells (including dry wells, irrigation wells, injection wells, monitoring wells, abandoned wells, or other wells)	Suspected	Suspected irrigation wells based on records but were not observed during site reconnaissance.
Septic Systems or Cesspools	No	
Other Notable Features	No	

At the time of the site reconnaissance, no permanent structures were observed on the subject property. Due to lack of access roads, mountainous terrain, dense vegetation and/or private property access constraints, several areas of the subject property were not readily accessible. However, UES attempted to view the inaccessible areas from a distance. The majority of the subject property consisted of undeveloped land with the exception of the southeast portion. The southeast portion of the subject property consisted of partially graded land with temporary storage structures, bulk storage containers, construction equipment, and various materials. Portions of the graded land appeared to be associated with a small unimproved airstrip and unimproved roadways. Evidence of stained soil along the air strip were not observed during site reconnaissance. The bulk storage containers consisted of multiple water holding tanks and one automatic transmission fluid tote. The tote and construction equipment appeared to be in good condition with no evidence of staining or releases. Other features on the subject property included natural drainages, access road/paths, and

areas of natural vegetation. Scattered areas of windblown debris were observed across the subject property. The debris appeared to consist of paper, cardboard, and other miscellaneous litter. Evidence of dumped petroleum products or hazardous substances was not observed during the site reconnaissance.

7.3 Adjoining Properties

During the site reconnaissance, properties adjoining the subject property were observed from the subject property boundaries, without being entered, or from curbside, for possible sources of impacts or environmental impairment which could migrate to the subject property via surface water runoff, groundwater transport, or other pathways. The subject property is bordered by the following:

DESCRIPTION OF ADJOINING PARCELS

DIRECTION	DESCRIPTION
North	Vacant land
East	Vacant land
South	Vacant land
West	Vacant land

Reconnaissance of the publicly accessible portions of the properties located immediately adjoining to the subject property did not reveal visible evidence of environmental concerns that could potentially impact the subject property.

8.0 INTERVIEWS

As part of this Phase I ESA, interviews were conducted to obtain information indicating RECs in connection with the subject property. The following persons or agencies were contacted for interviews in an effort to obtain information regarding the subject property. Interview records and/or requests for information are presented in the Interview Documentation Appendix.

Represents	Interviewed Yes/No	Name & Title	Interview Date	Comments
Current Property Owner Representative	Yes	Raymond Boff - Partner/Owner, RBK Industries LLC	December 12, 2024	Raymond Boff provided an owner questionnaire regarding his knowledge of the subject property. Mr. Boff was not aware of any environmental concerns associated with the subject property.

9.0 DEVIATIONS

UES has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice. To the best of our knowledge, there have not been deviations from the ASTM E2247-23 standard.

10.0 NON-SCOPE CONSIDERATIONS

No other services beyond the Phase I ESA were authorized by the User (or client) as part of this assessment and none were conducted. Additional services can be provided upon request at an additional fee.

11.0 FINDINGS AND OPINIONS

11.1 General Findings

- The subject property is comprised of approximately 1,679.94 acres of generally vacant land.
- The subject property appears to have consisted of undeveloped land with intermittent drainage channels, playa land, and unimproved roadways from 1954 to 2019. By 2023, the southeast portion of the subject property was graded with a small unimproved airstrip developed.
- The subject property was not identified as a record in the databases searched by Environmental Data Resources, Inc. (EDR) and the Nevada Division of Environmental Protection (NDEP).
- According to the information provided by the Northern Nevada Public Health (NNPH) and Nevada Division of Water Resources (NDWR), APNs 074-103-01 and 074-452-01 are equipped with three irrigation groundwater wells with static groundwater levels reported between 20 and 30 feet below ground surface (bgs). These wells were not able to be field verified during the site reconnaissance and the existing conditions of the wells are unknown.
- At the time of the site reconnaissance, no permanent structures were observed on the subject property. Due to lack of access roads, mountainous terrain, dense vegetation and/or private property access constraints, several areas of the subject property were not readily accessible. However, UES attempted to view the inaccessible areas from a distance. The majority of the subject property consisted of undeveloped land with the exception of the southeast portion. The southeast portion of the subject property consisted of partially graded land with temporary storage structures, bulk storage containers, construction equipment, and various materials. Portions of the graded land appeared to be associated with a small unimproved airstrip and unimproved roadways. Evidence of stained soil along the air strip were not observed during site reconnaissance. The bulk storage containers consisted of multiple water holding tanks and one automatic transmission fluid tote. The tote and construction equipment appeared to be in

good condition with no evidence of staining or releases. Other features on the subject property included natural drainages, access road/paths, and areas of natural vegetation. Scattered areas of windblown debris were observed across the subject property. The debris appeared to consist of paper, cardboard, and other miscellaneous litter. Evidence of dumped petroleum products or hazardous substances was not observed during the site reconnaissance.

11.2 Recognized Environmental Conditions

No RECs were found for the subject property.

11.3 Historical Recognized Environmental Conditions

No HRECs were found for the subject property.

11.4 Controlled Recognized Environmental Conditions

No CRECs were found for the subject property.

11.5 Vapor Encroachment Conditions

No VECs were found for the subject property.

11.6 Business Environmental Risk

No BERs were found for the subject property.

11.7 Data Gaps

As defined in ASTM E2247-23 a data gap is "a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information." The following data gaps were encountered during the course of this Phase I ESA:

- Historical aerial photographs were not available prior to 1940. However, UES believes that this data gap is not considered significant since it is likely that the subject property was vacant land based on a review of subsequent aerial images.
- Historical information found for the subject property may have exceeded five-year intervals. However, UES believes that this data gap is not considered significant as the specific use of the property and adjoining properties appears unchanged during the period of time that exceeded five years.
- Lack of traversable roads in some areas of the subject property limited UES's access. However, these areas could be viewed from a distance and/or were assessed through a review of aerial

photographs. Therefore, this limitation does not appear to represent a significant data gap that would preclude the identification of additional RECs in connection with the subject property.

- Past owners were not available within reasonable time and/or cost constraints for interview for this report. However, based on information obtained from EDR and regulatory records, this data gap is not considered significant since it is likely all information obtained would be duplicative of information obtained from other sources.

Per the ASTM standard, these data gaps are not considered significant and do not affect the findings of this Phase I ESA report.

12.0 CONCLUSIONS

UES has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E2247-23 for the unaddressed property identified by Washoe County as Assessor Parcel Numbers (APNs) 074-103-01, 074-103-05, 074-451-20, and 074-452-01 in Washoe County, Nevada. Any exceptions to, or deletions from, this practice are described in Section 10.0 of this report.

This assessment has revealed no evidence of RECs, HRECs, CRECs, VECs, BERs, or significant data gaps in connection with the subject property. Based on the information reviewed for this assessment, UES is of the opinion that additional investigations at the subject property are not warranted at this time.

The conclusions presented above are based upon the agreed scope of work outlined in the above report. UES makes no warranties or guarantees as to the accuracy or completeness of information obtained from others. It is possible that information exists beyond the scope of this assessment. Additional information, which is not available to UES at the time of writing the report, may result in a modification of the conclusions and recommendations presented. The services performed by UES have been conducted in a manner consistent with the level of care ordinarily exercised by members of our profession currently practicing under similar conditions. This report is not a legal opinion but may under certain circumstances be prepared at the direction of counsel, may be in anticipation of litigation, and may be classified as an attorney-client communication or as an attorney work product.

This report has been prepared for the sole use of the addressee(s) of this report and cannot be released without the consent from UES. If a third party relies on the information provided in this report, UES accepts no responsibility for damages suffered by the third party as a result of reliance on information contained in this report, and nothing contained in this report shall create a

contractual relationship or cause the third party to bring suit against UES. Further guidance is also presented in the Limitations Appendix.

13.0 ADDITIONAL INVESTIGATION

Based on the information reviewed for this assessment, UES is of the opinion that additional investigations at the subject property are not warranted at this time.

As required in ASTM E2247-23, the EP should provide an opinion regarding additional appropriate investigation, if any, to detect the presence of hazardous substances or petroleum products. This opinion is not intended to constitute a requirement that the EP include any recommendations for Phase II or other assessment activities. Accordingly, any opinions expressed herein do not necessarily constitute a recommendation for further investigation. UES would be pleased to discuss the recommendations for any additional investigation or evaluations with you outside of the context of this report.

14.0 QUALIFICATIONS

Resumes of the staff and EPs who performed this Phase I ESA of the subject property are included in the Resumes Appendix.

15.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

We declare that, to the best of our professional knowledge and belief, this Phase I ESA has been prepared and reviewed under the guidance of UES staff meeting the definition of Environmental Professional (EP) as defined in 312.10 of 40 CFR 312. UES EPs have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Property. We have developed and performed the all-appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. Resumes of the environmental professionals utilized in performance of this Phase I ESA are attached in the Resume Appendix.

Respectfully Submitted:
UES

Staff/Author

Leo Karcz
Staff Environmental Engineer

Reviewed by:
I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession, and to the best of my knowledge, comply with all applicable federal, state and local statutes, regulations and ordinances.

Senior Reviewer/EP

Anna Henry, E.I., C.E.M. #2497, Exp. Date 09/23/2025
Project Manager

16.0 REFERENCES

ASTM International, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM E 2247-23.

ASTM Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions, ASTME 2600-22.

Crafford, A.E.J., 2010, Geologic terrane map of Nevada, Nevada Bureau of Mines and Geology, Open File Report 10-4, 1:500,000.

Environmental Data Resources Inc. (EDR), *EDR Radius Map Report with Geocheck, Aerial Photo Decade Package, Historical Topographic Map Report, Sanborn Map Report, City Directory Image Report, and Vapor Encroachment Screen,* Inquiry Number: 7840954, Submitted December 5, 2024.

Natural Resources Conservation Service (NRCS), U.S. Department of Agriculture, Web Soil Survey. Available online at*http://websoilsurvey.nrcs.usda.gov.*

Nevada Division of Water Resources (NDWR), Nevada Hydrology Data and Nevada Water Rights Mapping Applications and Well Log Database. Availableonline at*http://water.nv.gov/mapping.aspx*.

Washoe County Assessor's Office, Real Property Assessment Data. Available online at *https://www.washoecounty.us/assessor.*

Western Regional Climate Center (WRCC), Historical Climate Information, Western U.S. Historical Climate Summaries. Available online at*http://www.wrcc.dri.edu/coopmap.*

FIGURES

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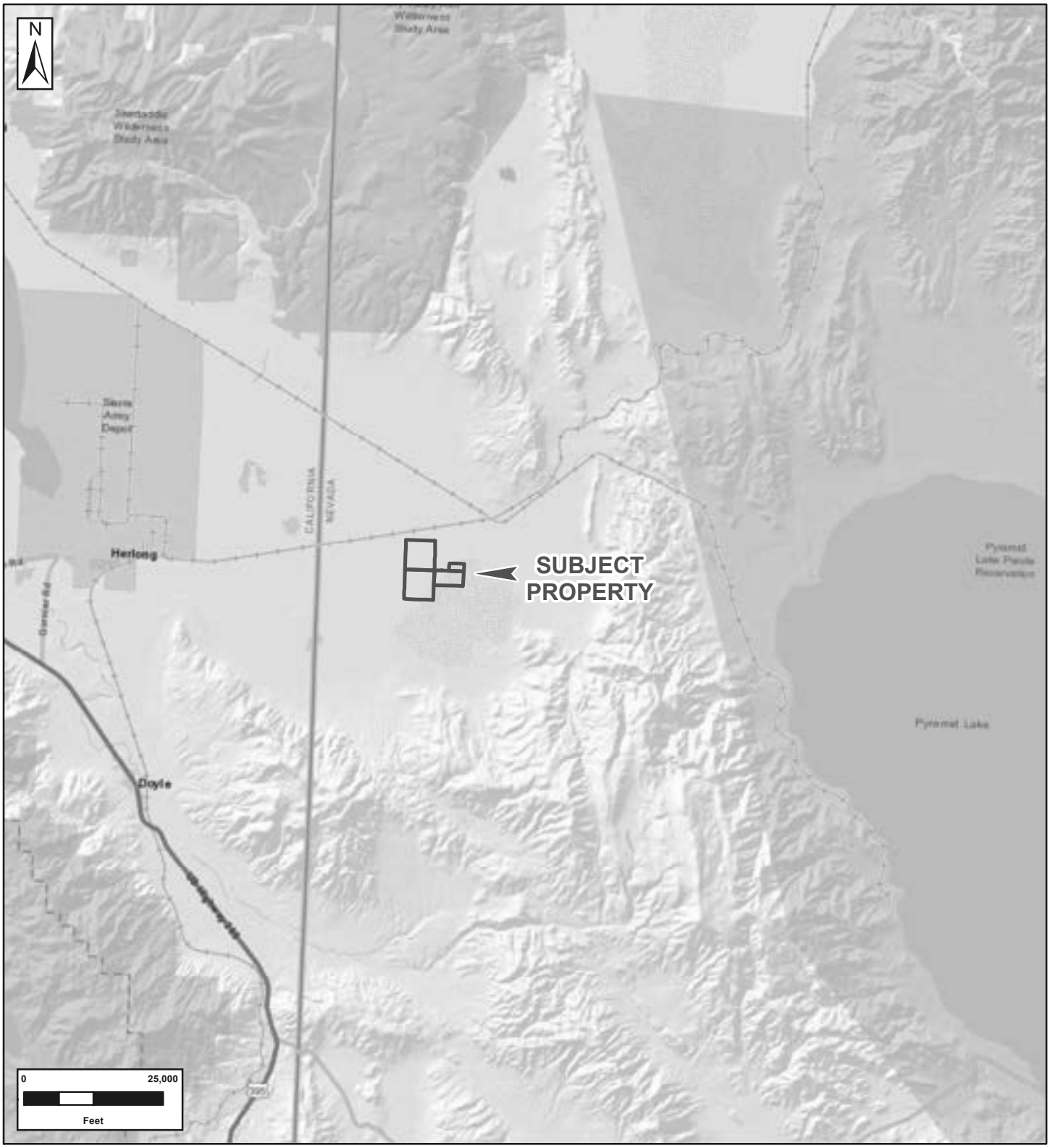




FIGURE 1

TITLE:

PROJECT LOCATION MAP

-SHOWING-

APNs: 074-103-01, 074-103-05, 074-451-20, and 074-452-01

Washoe County, NV

UES™

FILE: **Figure 1 - Project Location Map**

COORDINATE SYSTEM: **NAD 1983 UTM Zone 11N**

JOB NO.:	DATE:
UES082	**12/13/2024**

REF.					REVISION:
	DESIGNED	HC	CHECKED	LK	-
	DRAWN	HC	APPROVED	AH	

R:\Projects\UES\UES082 - Robert Simmons Solar Project Phase I\GIS\Figure 1 - Project Location Map.mxd

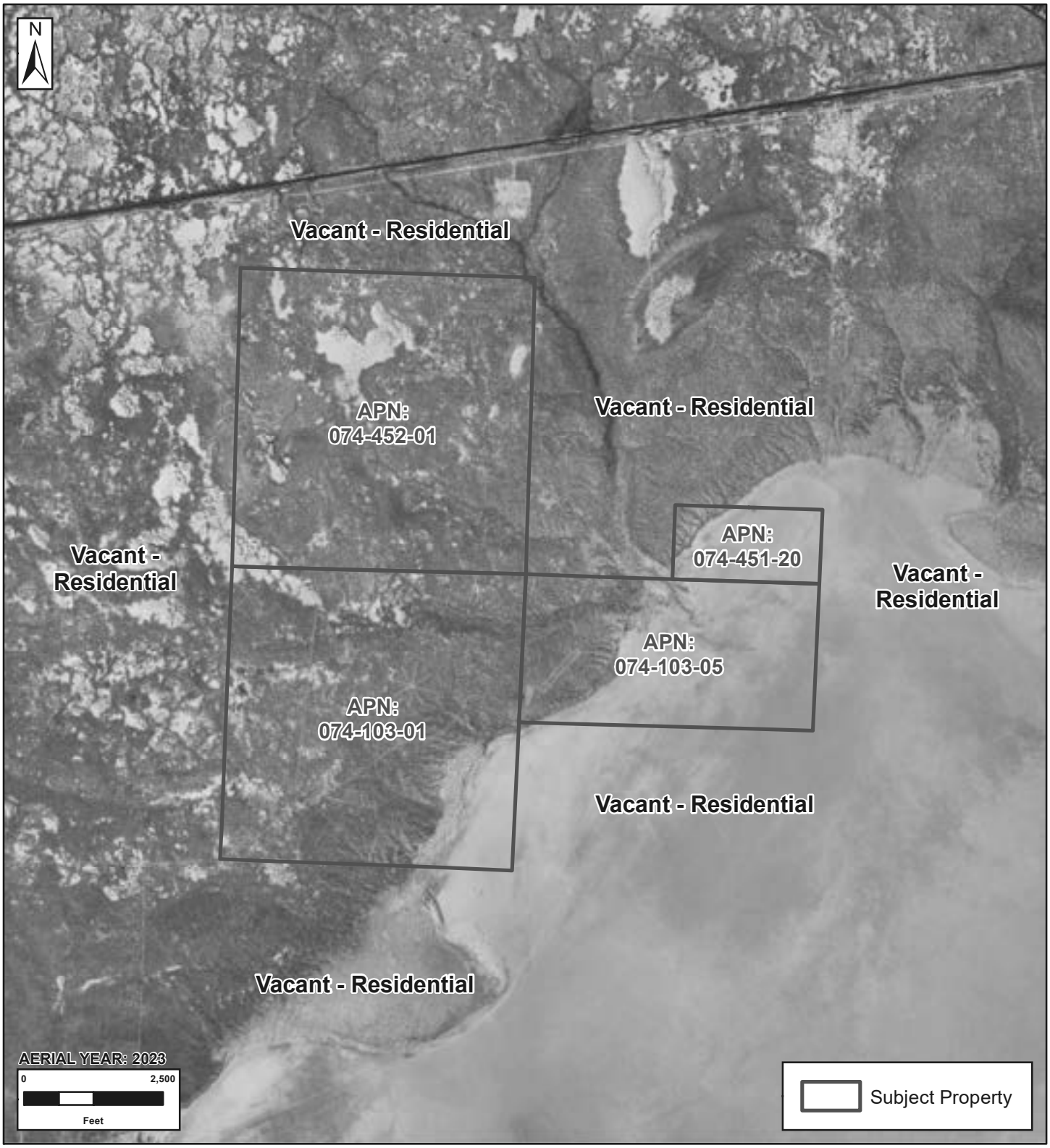




FIGURE 2

TITLE:

SITE MAP

-SHOWING-

APNs: 074-103-01, 074-103-05, 074-451-20, and 074-452-01

Washoe County, NV

JOB NO.:	DATE:
UES082	12/13/2024

UES™

FILE: **Figure 2 - Site Map**

COORDINATE SYSTEM: **NAD 1983 UTM Zone 11N**

REF.					REVISION:
	DESIGNED	HC	CHECKED	LK	-
	DRAWN	HC	APPROVED	AH	

R:\Projects\UES\UES082 - Robert Simmons Solar Project Phase I\GIS\Figure 2 - Site Map.mxd

USER QUESTIONNAIRE

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USER QUESTIONNAIRE

Property Address: APNs 074-452-01, 074-103-01, 074-103-05, and 074-451-20, Washoe County, NV

In order to qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the *"Brownfields Amendments"*), the *user* must conduct the following inquiries required by 40 CFR 312.25, 312.28, 312.29, 312.30, and 312.31. These inquires must also be conducted by EPA Brownfield Assessment and Characterization grantees. The *User* should provide the following information to the *environmental professional.* Failure to conduct these inquiries could result in a determination that *"all appropriate inquiries"* is not complete.

The *"User,"* as defined by the ASTM 1527-21 Standard Practice for Environmental Site Assessments, is "the party seeking to use Practice E1527 to complete an environmental site assessment of the property. A User may include, without limitation, a potential purchaser of property, a potential tenant of property, an owner of property, a lender, or a property manager." The User has specific obligations for completing a successful application of this practice, which includes, but is not limited, to the following:

(1.) Environmental liens that are filed or recorded against the property (40 CFR 312.25).
To meet the requirements of 40 CFR 312.20 and 312.25, a search for the existence of environmental liens and activity use limitations (AULs) that are filed or recorded against the property must be conducted. Environmental liens and AULs are legally distinct instruments and have very different purposes and both can commonly be found within recorded land title records (e.g County Recorder/Registry of Deeds). Any environmental liens and AULs known to the User should be reported to the environmental professional. The User should engage a title company, real estate attorney, or title professional to undertake a review of reasonably ascertainable recorded land title records and lien records for environmental liens and AULs currently recorded against or relating to the property.

Did a search of *recorded land title records* (or judicial records where appropriate, see Note 1 below) identify any environmental liens filed or recorded against the *property* under federal, tribal, state, or local law?

Note 1- In certain jurisdictions, federal, tribal, state, or local statutes, or regulations specify that environmental liens and AULs be filed in judicial records rather than in land title records. In such cases judicial records must be searched for environmental liens and AULs.

Unknown to User at time of questionnaire. Land is open and unused and has been vacant to User's knowledge.

(2.) Activity and use limitations that are in place on the *property* or that have been filed or recorded against the *property* (40 CFR 312.26(a)(1)(v) and (vi)).
Did a search of *recorded land title records* (or judicial records where appropriate, see Note 1 above) identify any AULs, such as *engineering controls*, land use restrictions, or *institutional controls* that are in place at the *property* and/or have been filed or recorded against the *property* under federal, tribal, state, or local law?

Unknown to User at time of questionnaire.

Initials: _____

USER QUESTIONNAIRE

Property Address: APNs 074-452-01, 074-103-01, 074-103-05, and 074-451-20, Washoe County, NV

(3.) Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).
Do you have any specialized knowledge or experience related to the *property* or nearby properties? For example, are you involved in the same line of business as the current or former *occupants* of the *property* or an *adjoining property* so that you would have specialized knowledge of the chemicals and processes used by this type of business?

No specialized knowledge or experience related to the property or nearby properties. Land is vacant.

(4.) Relationship of the purchase price to the fair market value of the *property* if it were not contaminated (40 CFR 312.29).
Does the purchase price being paid for this *property* reasonably reflect the fair market value of the *property*? If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the *property*?

Not part of sale transaction. Land is vacant.

(5.) Commonly known or *reasonably ascertainable* information about the *property* (40 CFR 312.30).
Are you aware of commonly known or *reasonably ascertainable* information about the *property* that would help the *environmental professional* to identify conditions indicative of releases or threatened releases? For example,

(a.) Do you know the past uses of the *property*?

No.

(b.) Do you know of specific chemicals that are present or once were present at the *property*?

No.

(c.) Do you know of spills or other chemical releases that have taken place at the *property*?

No.

(d.) Do you know of any environmental cleanups that have taken place at the *property*?

No.

Initials: _____

USER QUESTIONNAIRE

Property Address: APNs 074-452-01, 074-103-01, 074-103-05, and 074-451-20, Washoe County, NV

(6.) The degree of obviousness of the presence or likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).
Based on your knowledge and experience related to the *property* are there any *obvious* indicators that point to the presence or likely presence of releases at the *property*?

Not to User's knowledge. Land is vacant.

Signature: _____ Date: 12/12/24

Printed Name: Raymond Boff Title: partner / owner

Company: RBK - Industries LLC

Initials: _____

AERIAL PHOTOGRAPHS, TOPOGRAPHIC MAPS, SANBORN FIRE INSURANCE MAPS AND CITY DIRECTORIES

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Robert Simmons Solar

Fish Springs Road

Empire, NV 89405

Inquiry Number: 7840954.8

December 10, 2024

The EDR Aerial Photo Decade Package

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Date EDR Searched Historical Sources:

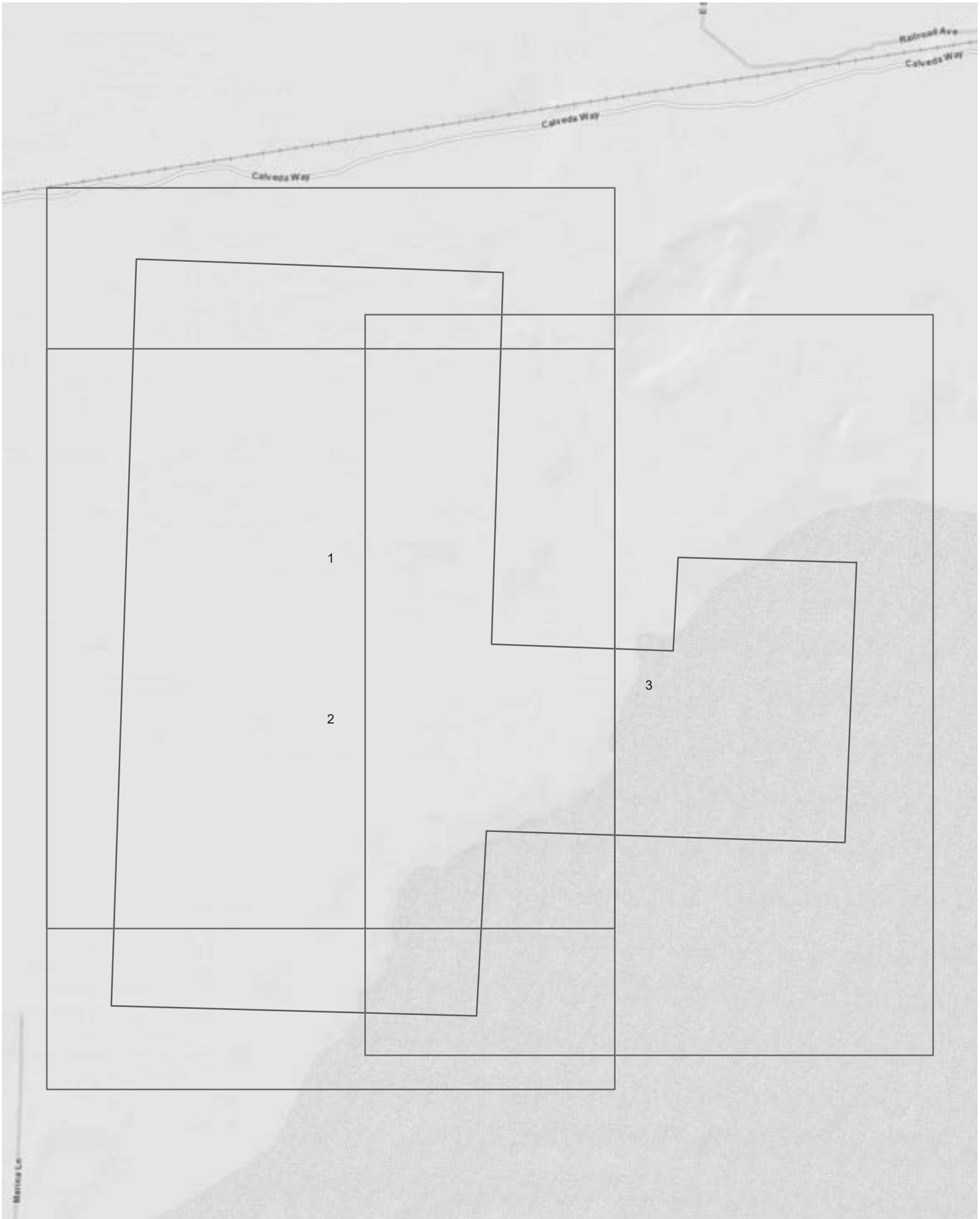
Aerial Photography December 10, 2024

Target Property:

Fish Springs Road

Empire, NV 89405

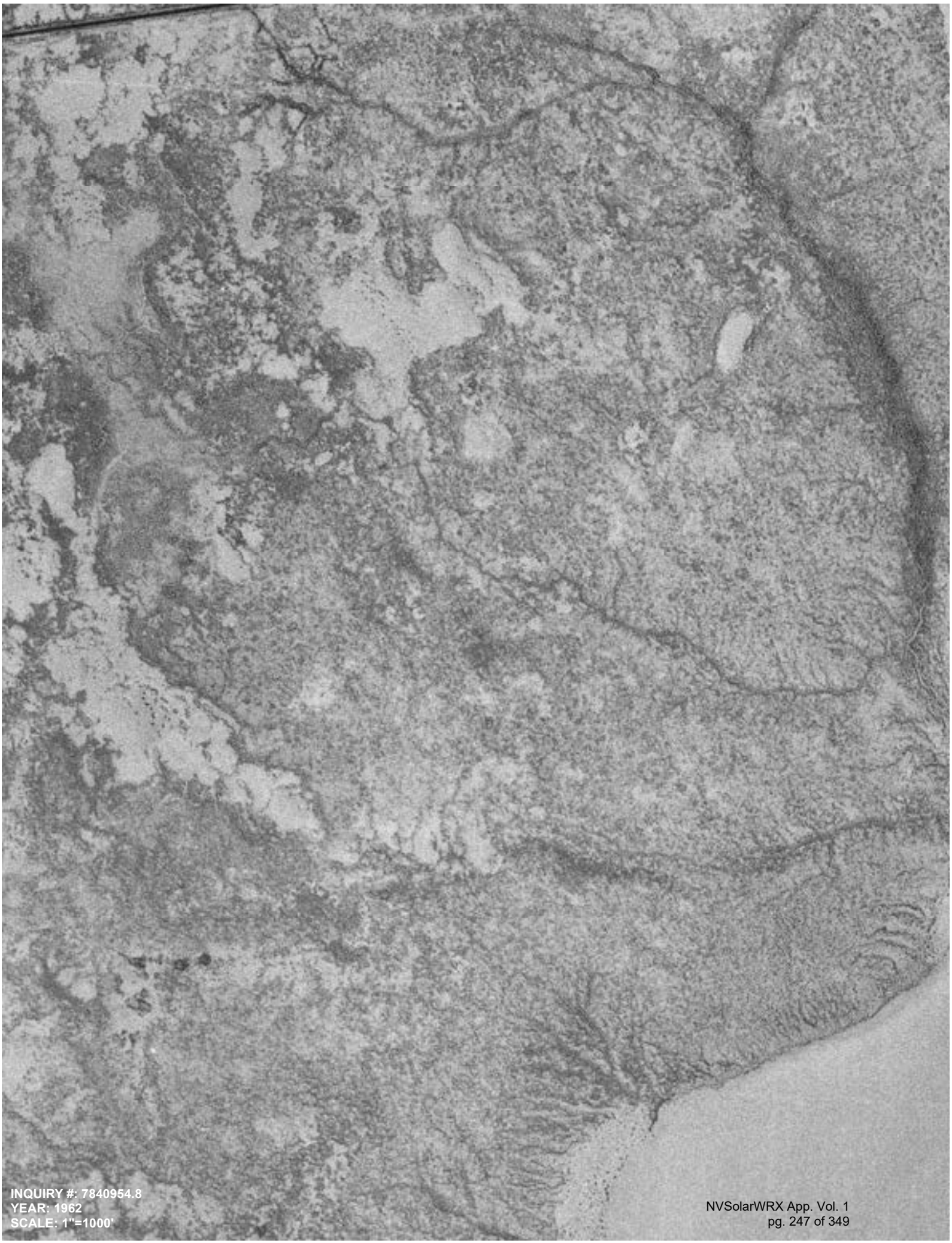
Year	***Scale***	***Details***	***Source***
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1962	Aerial Photograph. Scale: 1"=1000'	Flight Year: 1962	USGS
1970	Aerial Photograph. Scale: 1"=1000'	Flight Year: 1970	USGS
1974	Aerial Photograph. Scale: 1"=1000'	Flight Year: 1974	USGS
1980	Aerial Photograph. Scale: 1"=1000'	Flight Year: 1980	USDA
1999	Aerial Photograph. Scale: 1"=1000'	Flight Year: 1999	USGS/DOQQ
2006	Aerial Photograph. Scale: 1"=1000'	Flight Year: 2006	USGS/NAIP
2010	Aerial Photograph. Scale: 1"=1000'	Flight Year: 2010	USGS/NAIP
2015	Aerial Photograph. Scale: 1"=1000'	Flight Year: 2015	USGS/NAIP
2019	Aerial Photograph. Scale: 1"=1000'	Flight Year: 2019	USGS/NAIP


Railroad Ave
Calveda Way
Calveda Way
Calveda Way
1
2
3









INQUIRY #: 7840954.8
YEAR: 1962
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 1962
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 1962
SCALE: 1"=1000'

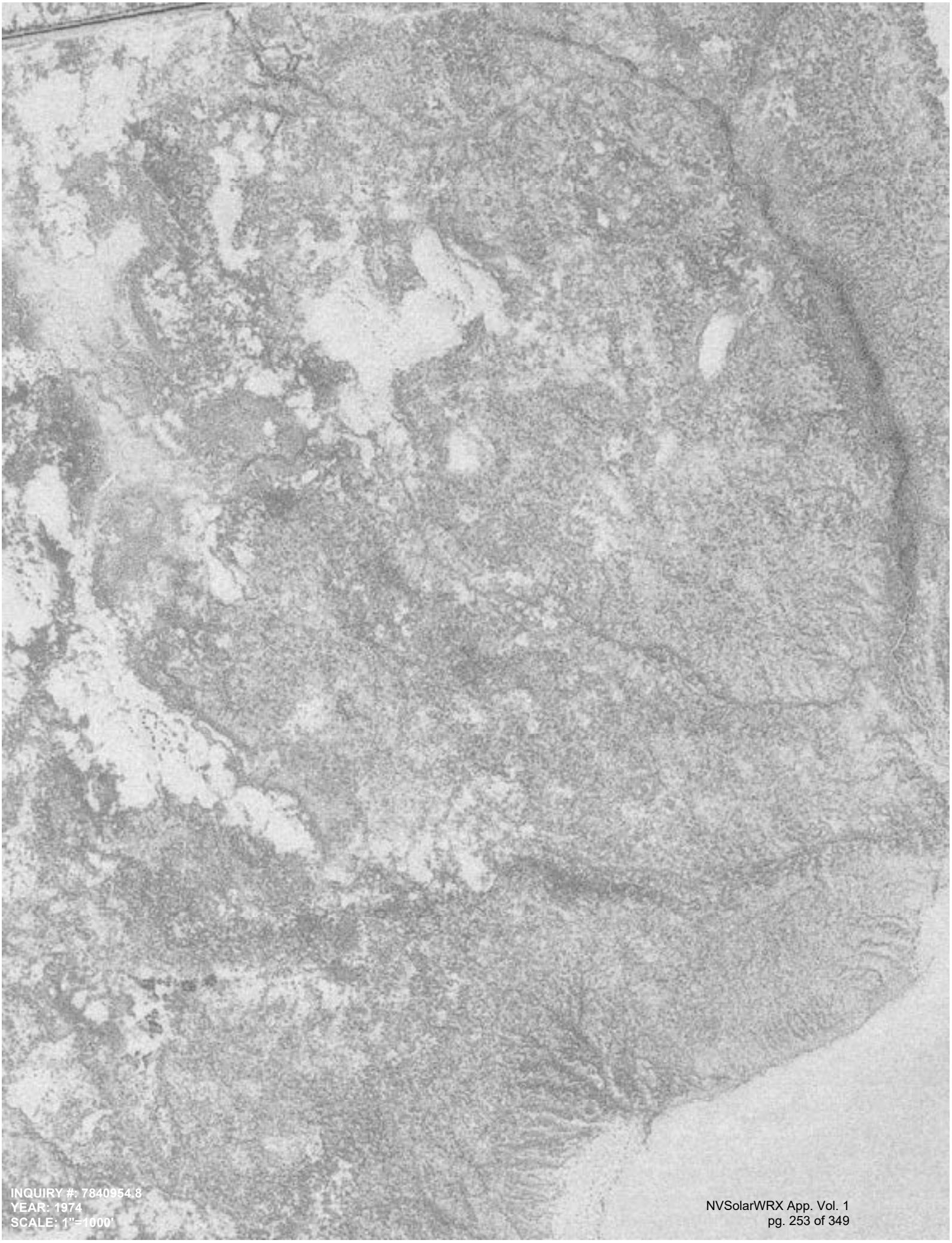


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SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 1970
SCALE: 1"=1000'





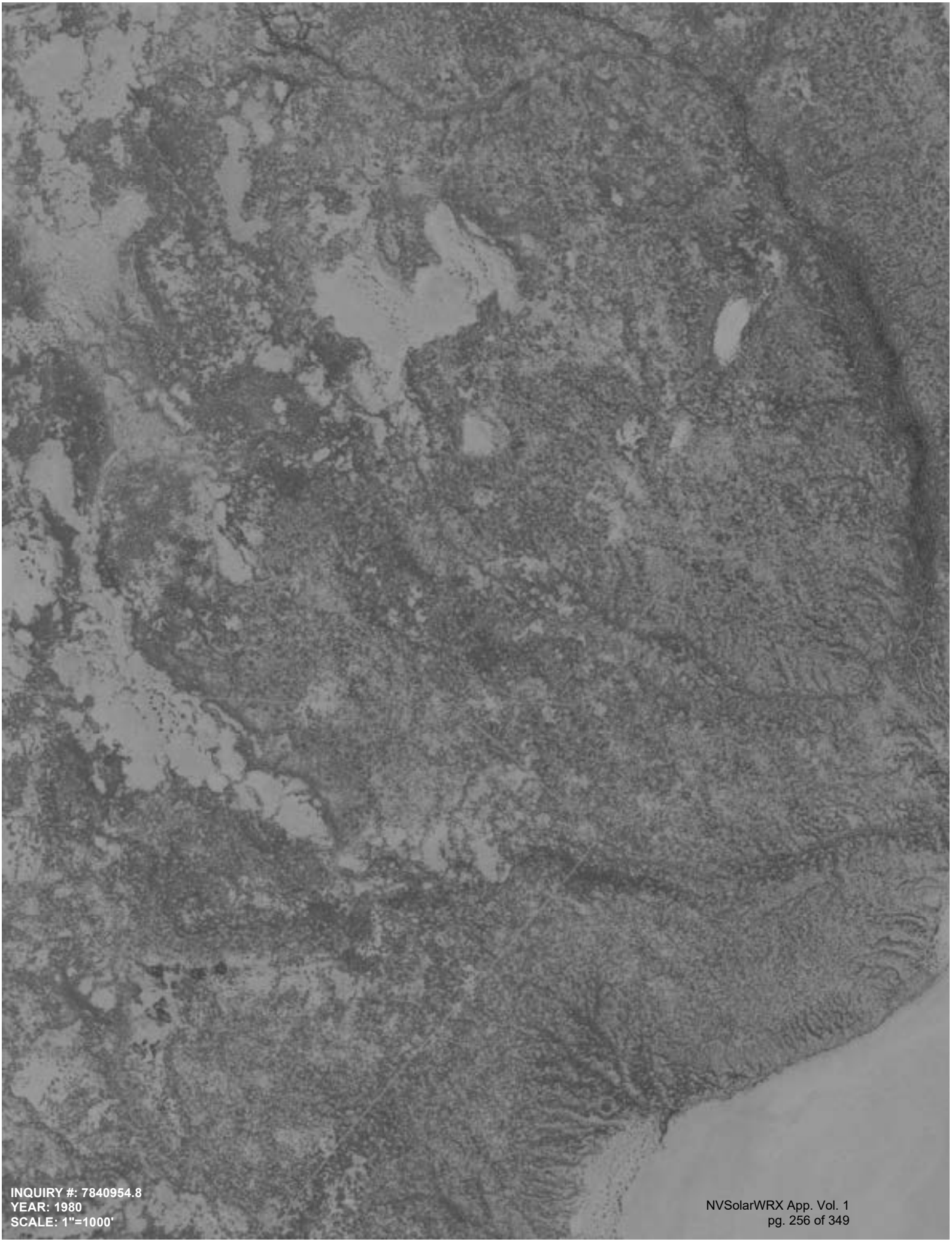
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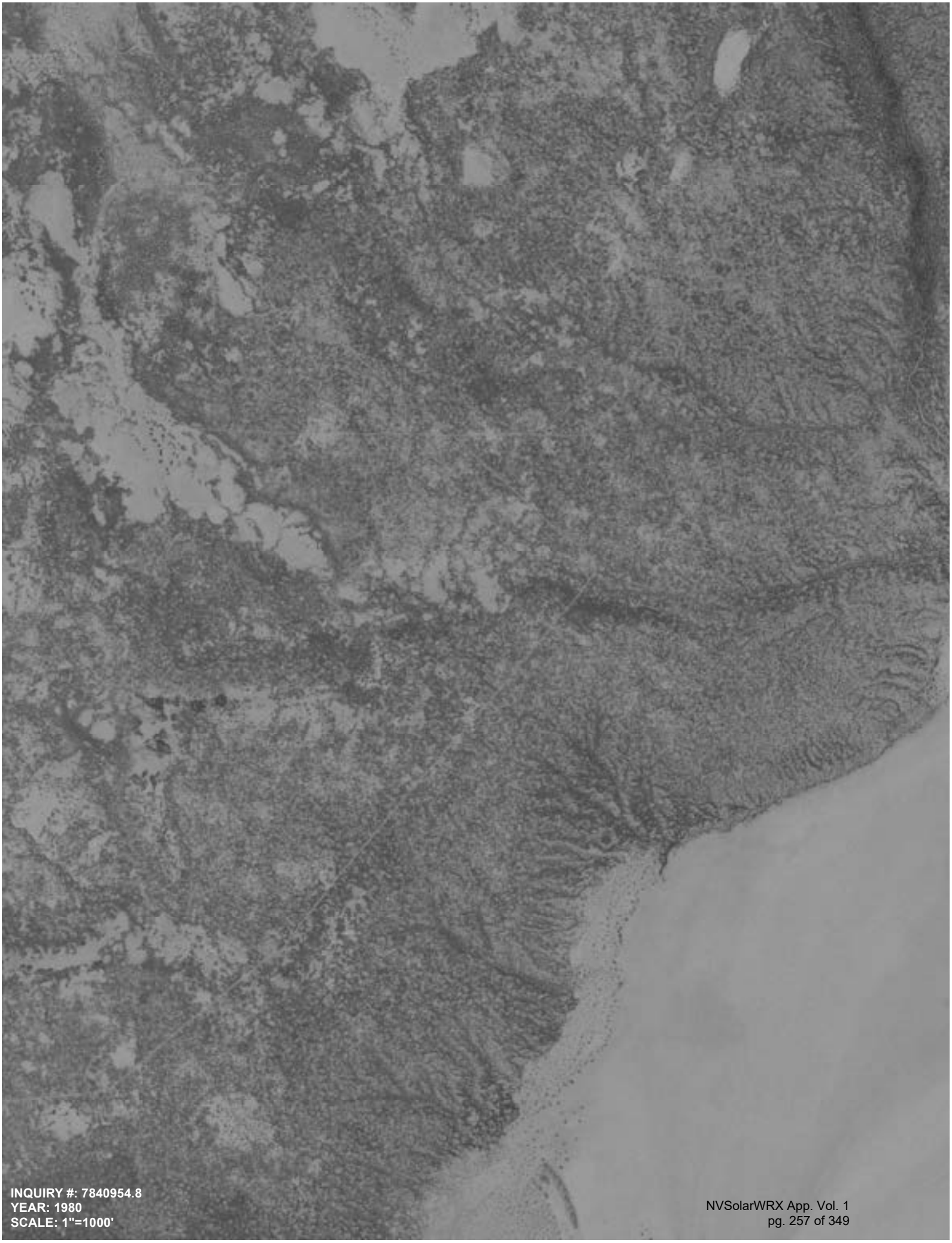
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SCALE: 1"=1000'



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YEAR: 1974
SCALE: 1"=1000'



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YEAR: 1980
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 1980
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 1980
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 1993
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 1993
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 1993
SCALE: 1"=1000'



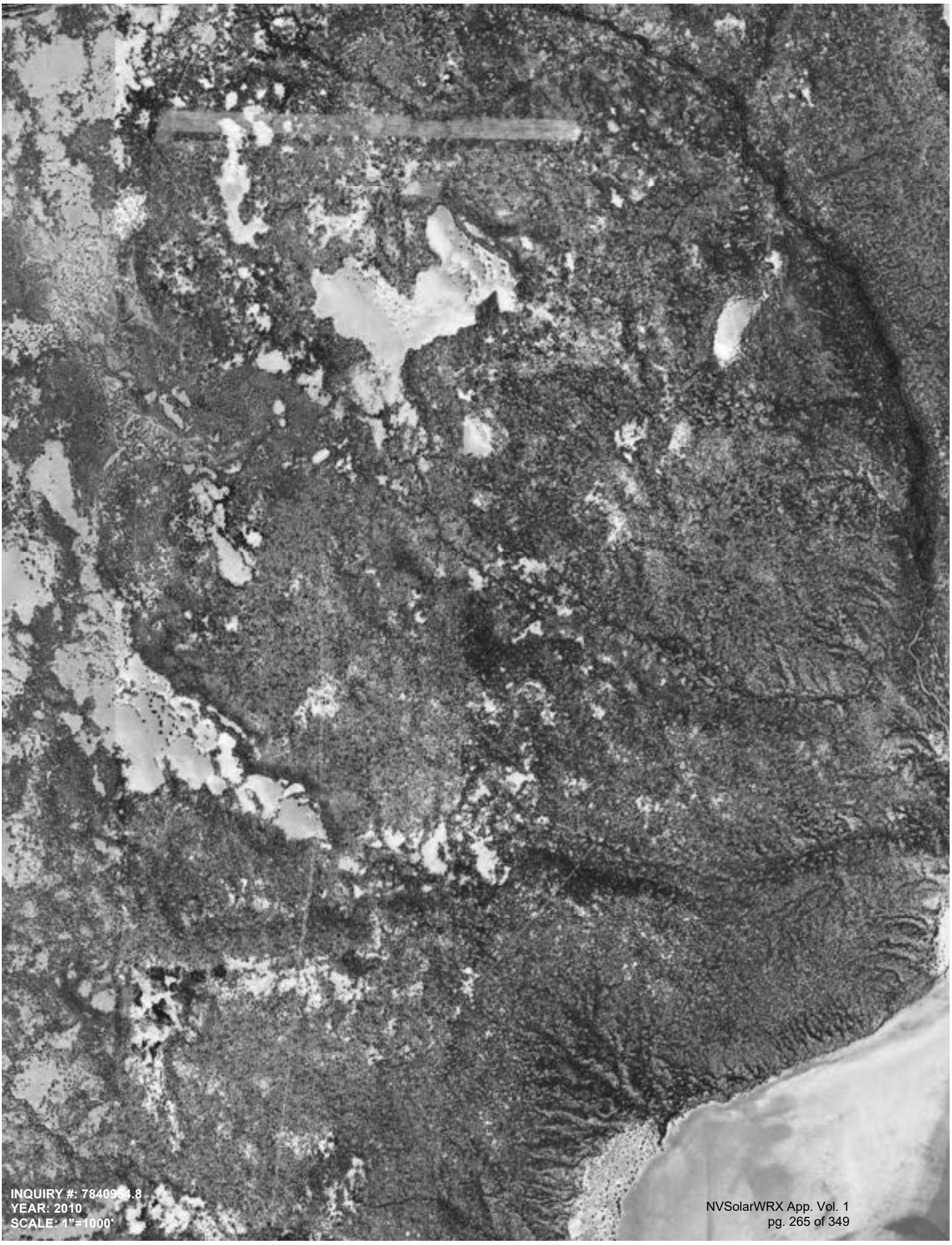
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SCALE: 1"=1000'



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YEAR: 2006
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 2006
SCALE: 1"=1000'



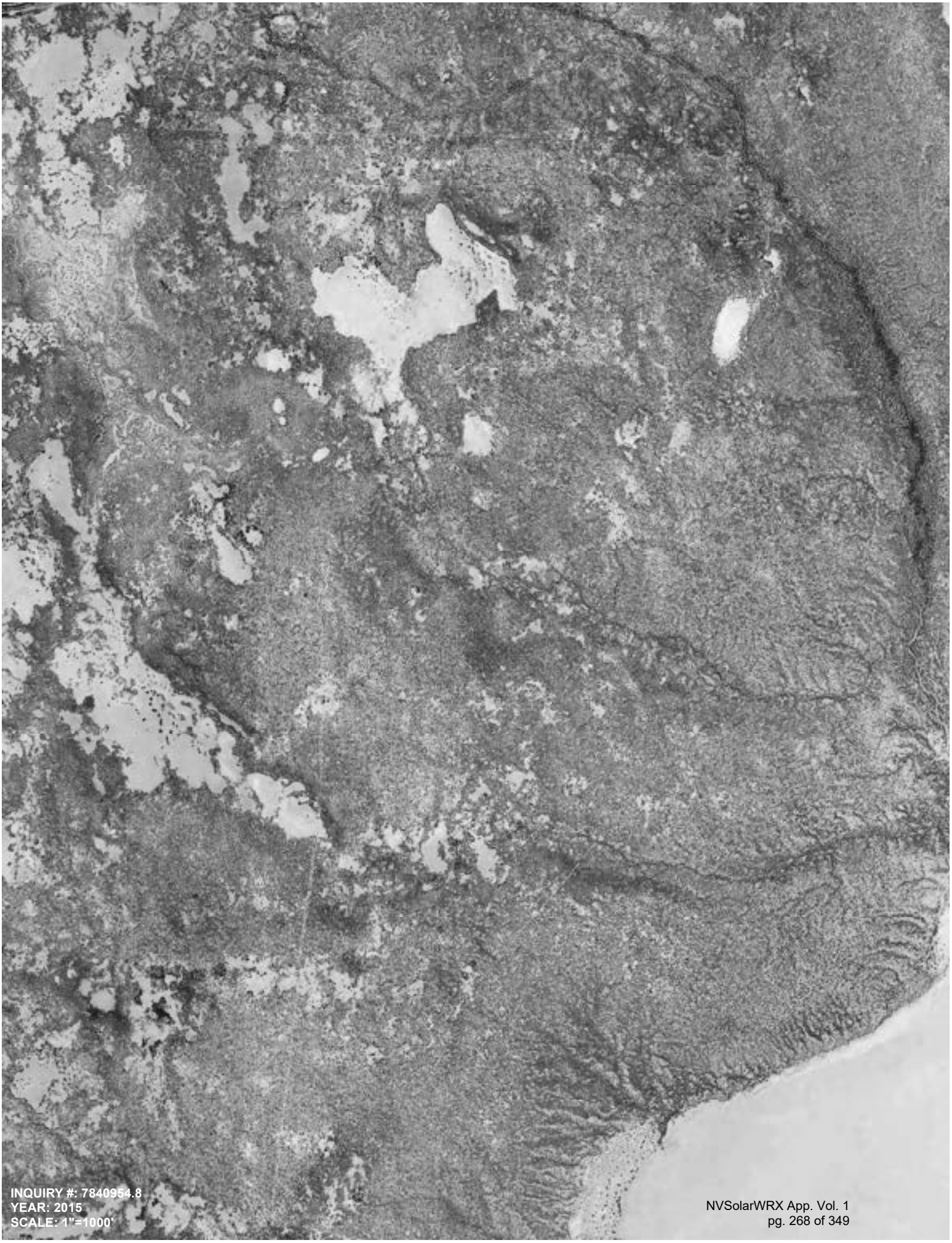
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YEAR: 2010
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 2010
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 2010
SCALE: 1"=1000'



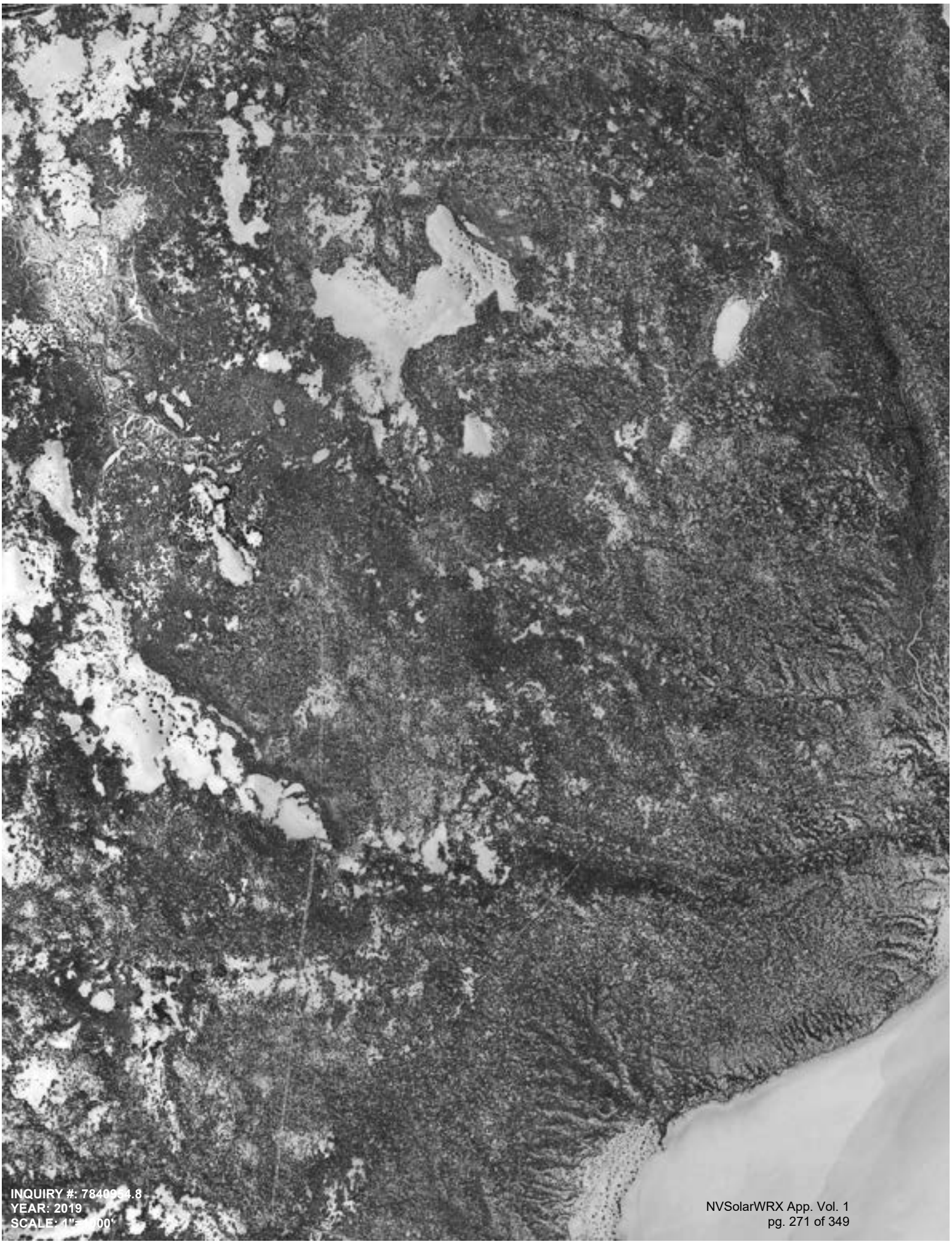
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SCALE: 1"=1000'



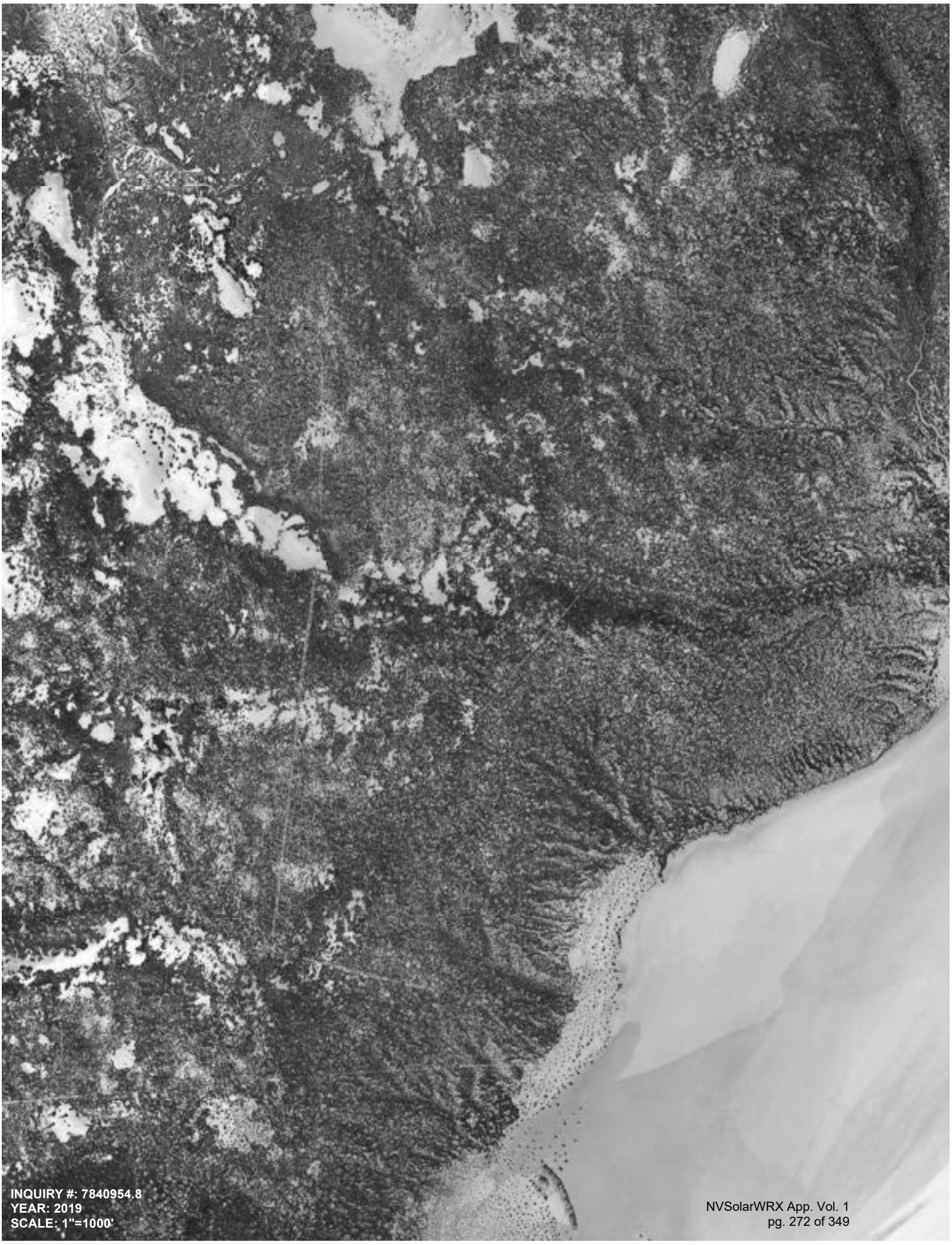
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INQUIRY #: 7840954.8
YEAR: 2015
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 2019
SCALE: 1" = 4000'



INQUIRY #: 7840954.8
YEAR: 2019
SCALE: 1"=1000'



INQUIRY #: 7840954.8
YEAR: 2019
SCALE: 1"=1000'

Robert Simmons Solar
Fish Springs Road
Empire, NV 89405

Inquiry Number: 7840954.4
December 06, 2024

EDR Historical Topo Map Report

with QuadMatch™

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Historical Topo Map Report

12/06/24

Site Name:	Client Name:
Robert Simmons Solar	McGinley Associates
Fish Springs Road	5410 Longley Lane
Empire, NV 89405	Reno, NV 89511
EDR Inquiry # 7840954.4	Contact: Anna Henry, E.I., C.E.M. #2497

EDR Topographic Map Library has been searched by EDR and maps covering the target property location as provided by McGinley Associates were identified for the years listed below. EDR's Historical Topo Map Report is designed to assist professionals in evaluating potential liability on a target property resulting from past activities. EDRs Historical Topo Map Report includes a search of a collection of public and private color historical topographic maps, dating back to the late 1800s.

Search Results:		*Coordinates:*	
P.O.#	NA	**Latitude:**	40.138474 40° 8' 19" North
Project:	UES082	**Longitude:**	-119.929064 -119° 55' 45" West
		UTM Zone:	Zone 11 North
		UTM X Meters:	250463.18
		UTM Y Meters:	4447240.37
		Elevation:	3988.00' above sea level

Maps Provided:

2021
2018
2014
1981
1974
1964

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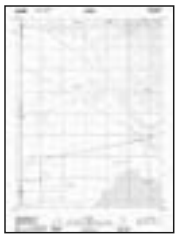
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Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

2021 Source Sheets



Flanigan
2021
7.5-minute, 24000



State Line Peak
2021
7.5-minute, 24000

2018 Source Sheets



Flanigan
2018
7.5-minute, 24000



State Line Peak
2018
7.5-minute, 24000

2014 Source Sheets



Flanigan
2014
7.5-minute, 24000



State Line Peak
2014
7.5-minute, 24000

1981 Source Sheets



State Line Peak
1981
7.5-minute, 24000
Aerial Photo Revised 1980



Flanigan
1981
7.5-minute, 24000
Aerial Photo Revised 1980



STATE LINE PEAK
1981
7.5-minute, 24000

Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1974 Source Sheets



Flanigan
1974
7.5-minute, 24000
Aerial Photo Revised 1962

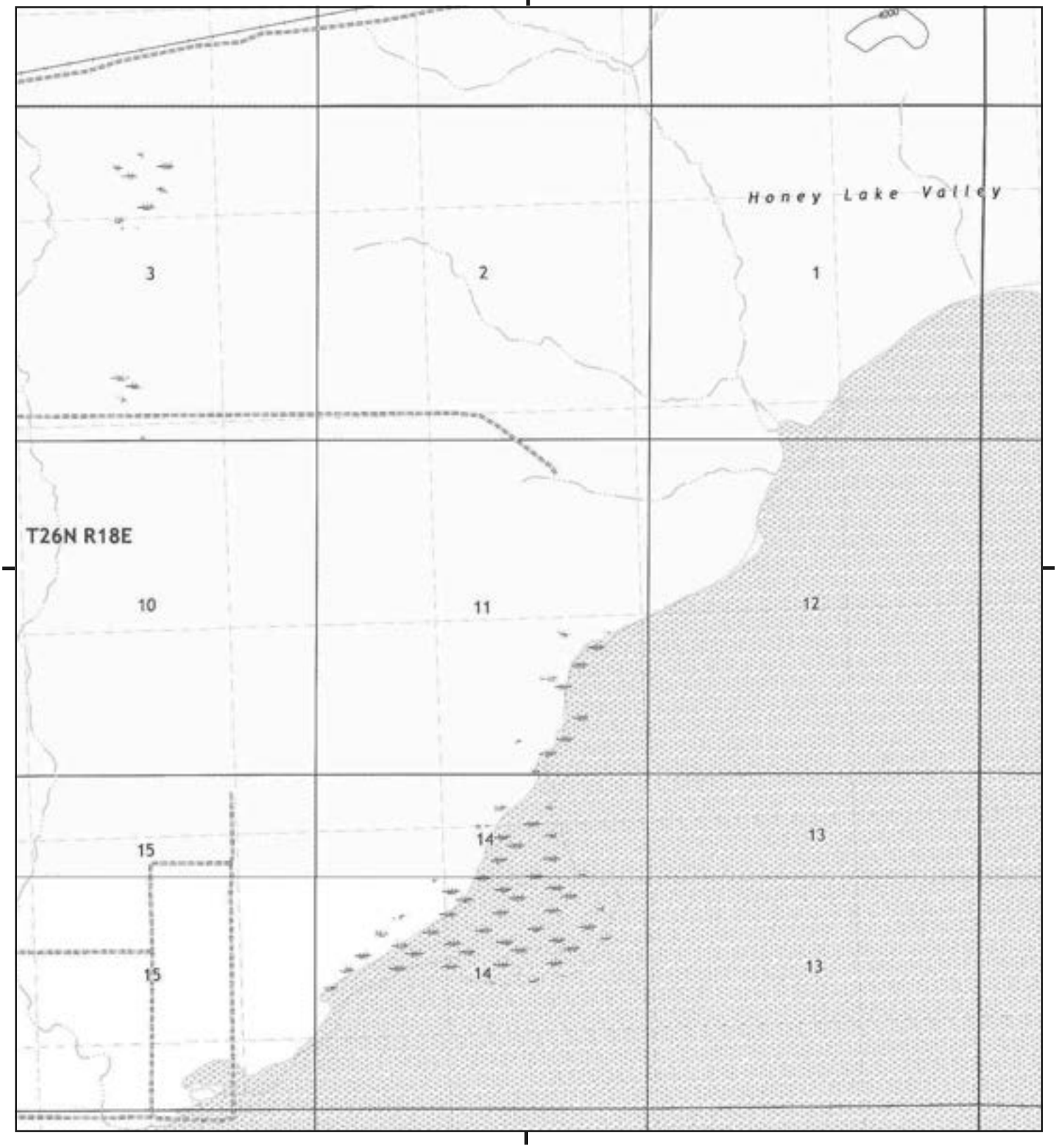
1964 Source Sheets



State Line Peak
1964
7.5-minute, 24000
Aerial Photo Revised 1962



Flanigan
1964
7.5-minute, 24000
Aerial Photo Revised 1962



This report includes information from the following map sheet(s).

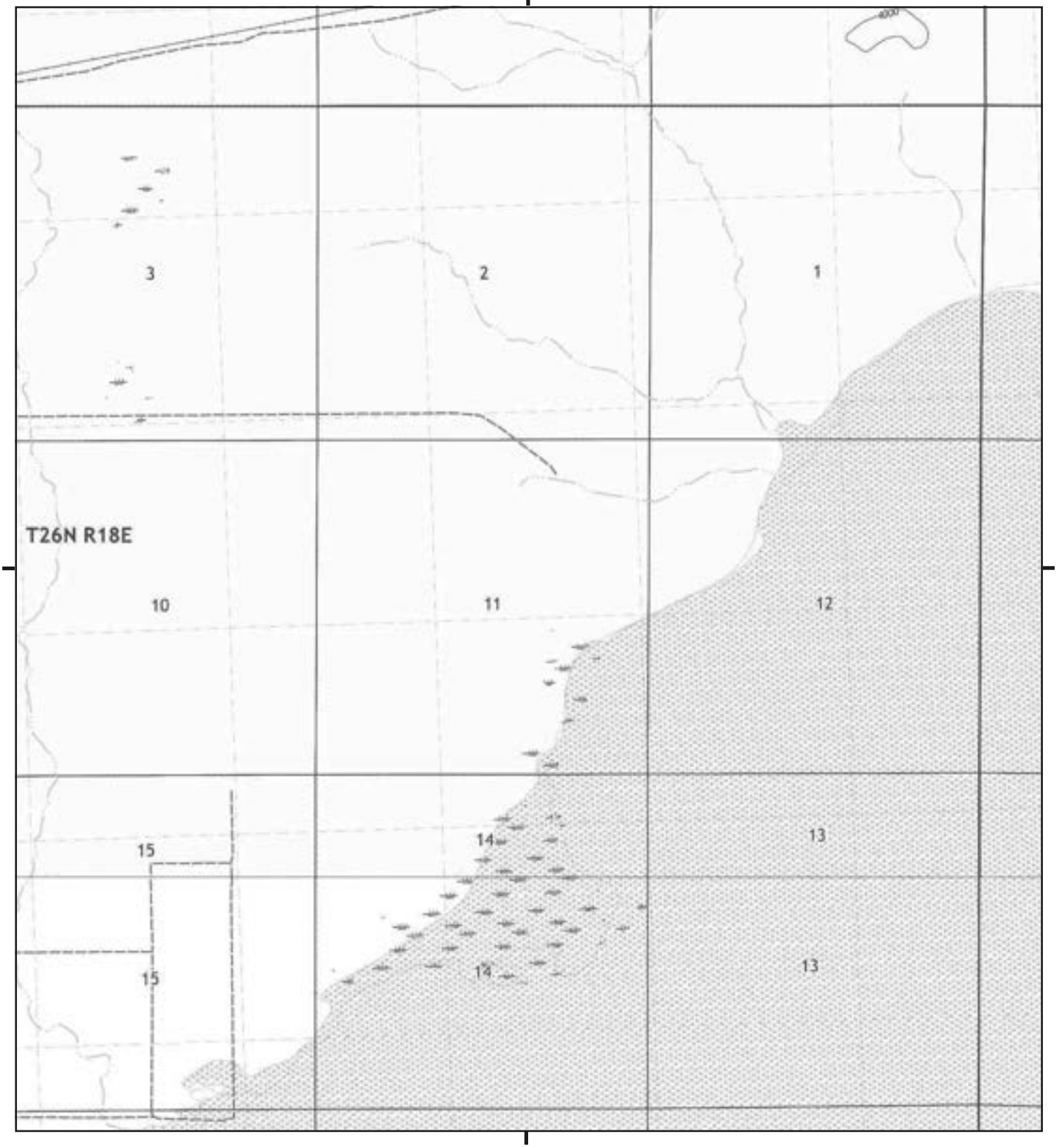
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Flanigan, 2021, 7.5-minute
S, State Line Peak, 2021, 7.5-minute

SITE NAME: Robert Simmons Solar
ADDRESS: Fish Springs Road
Empire, NV 89405
CLIENT: McGinley Associates

N



This report includes information from the following map sheet(s).

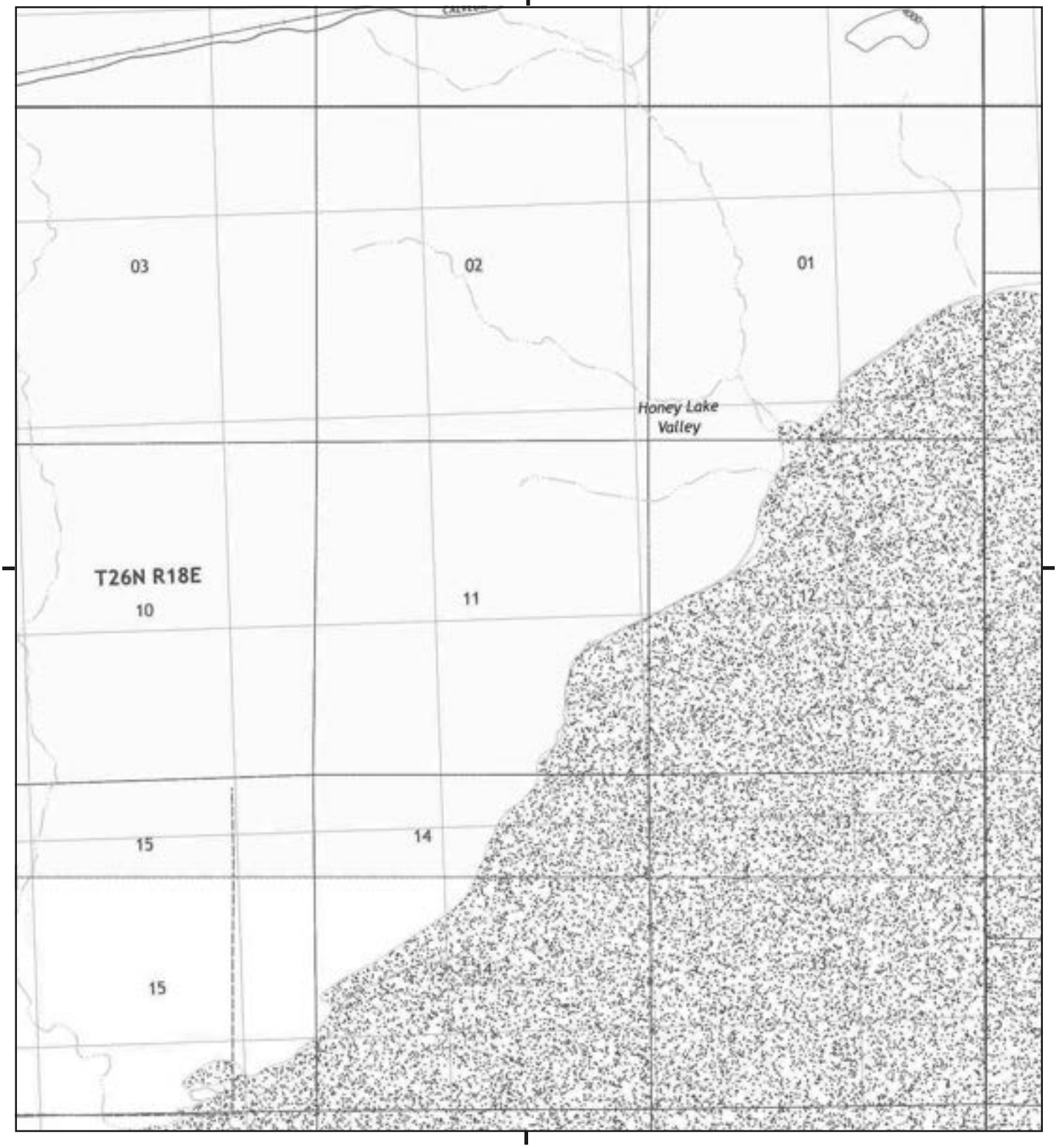
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Flanigan, 2018, 7.5-minute
S, State Line Peak, 2018, 7.5-minute

SITE NAME: Robert Simmons Solar
ADDRESS: Fish Springs Road
Empire, NV 89405
CLIENT: McGinley Associates

N



This report includes information from the following map sheet(s).

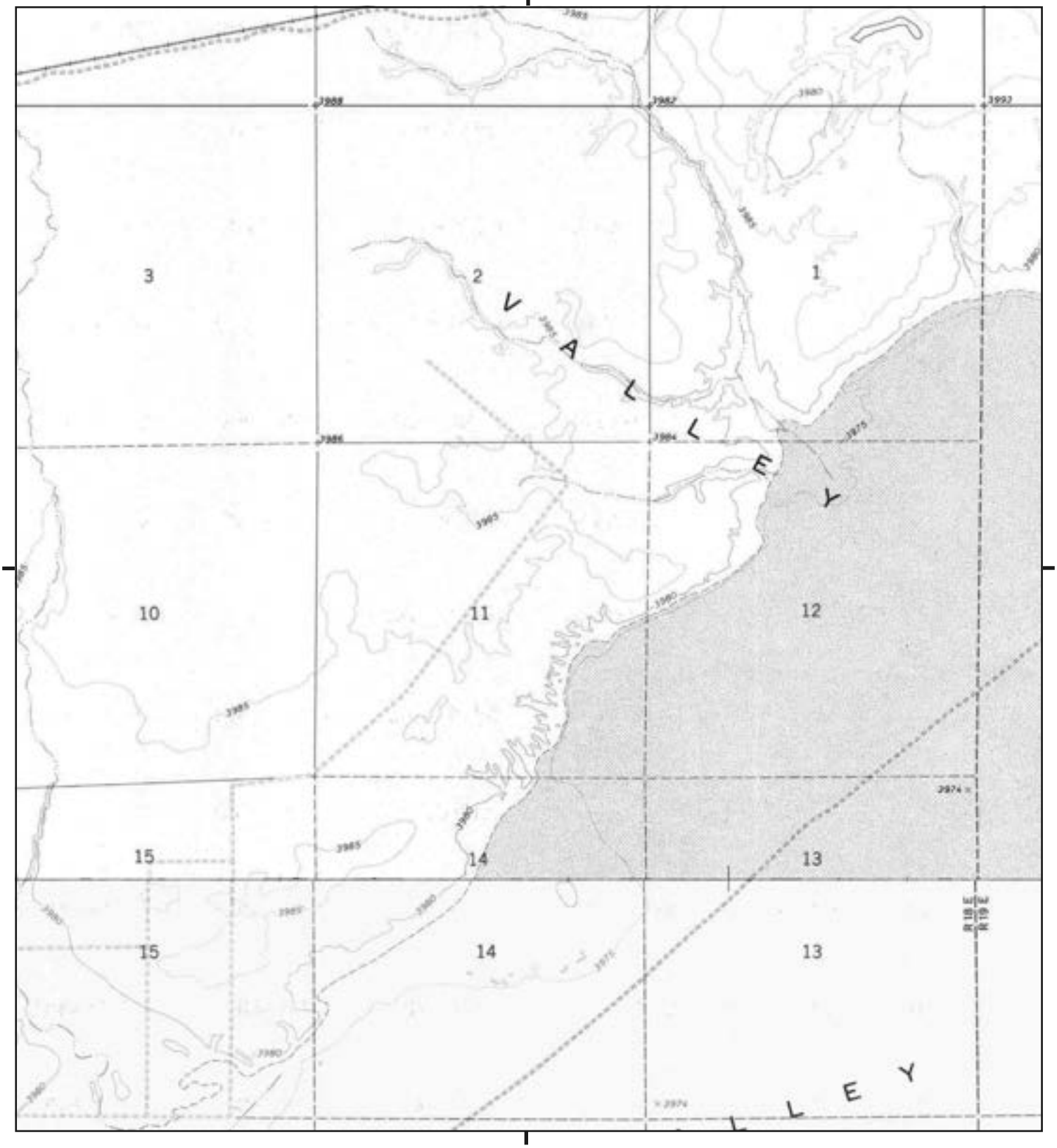
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Flanigan, 2014, 7.5-minute
S, State Line Peak, 2014, 7.5-minute

SITE NAME: Robert Simmons Solar
ADDRESS: Fish Springs Road
Empire, NV 89405
CLIENT: McGinley Associates

N



This report includes information from the following map sheet(s).

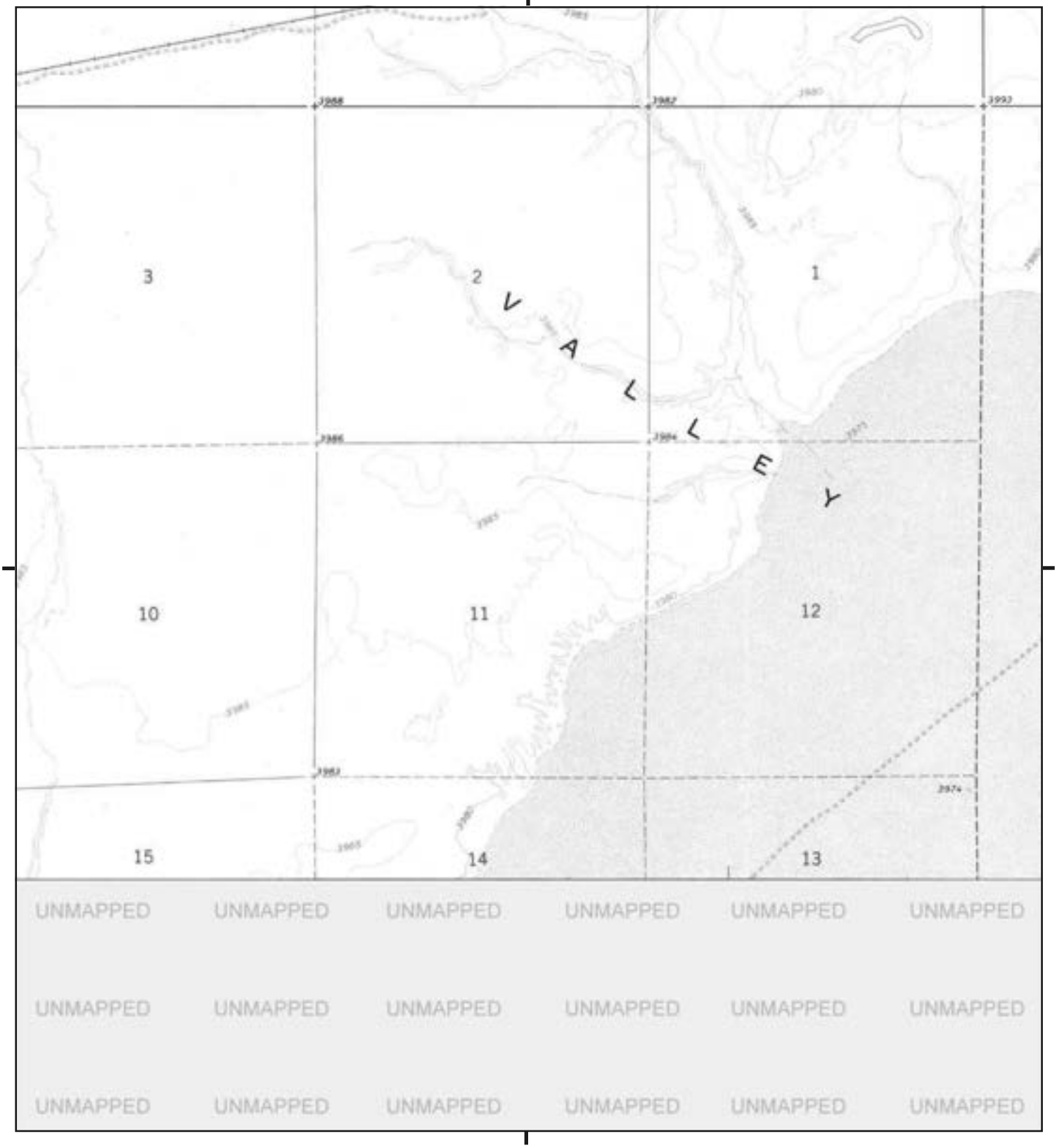
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Flanigan, 1981, 7.5-minute
S, State Line Peak, 1981, 7.5-minute
S, STATE LINE PEAK, 1981, 7.5-minute

SITE NAME: Robert Simmons Solar
ADDRESS: Fish Springs Road
Empire, NV 89405
CLIENT: McGinley Associates

N



This report includes information from the following map sheet(s).

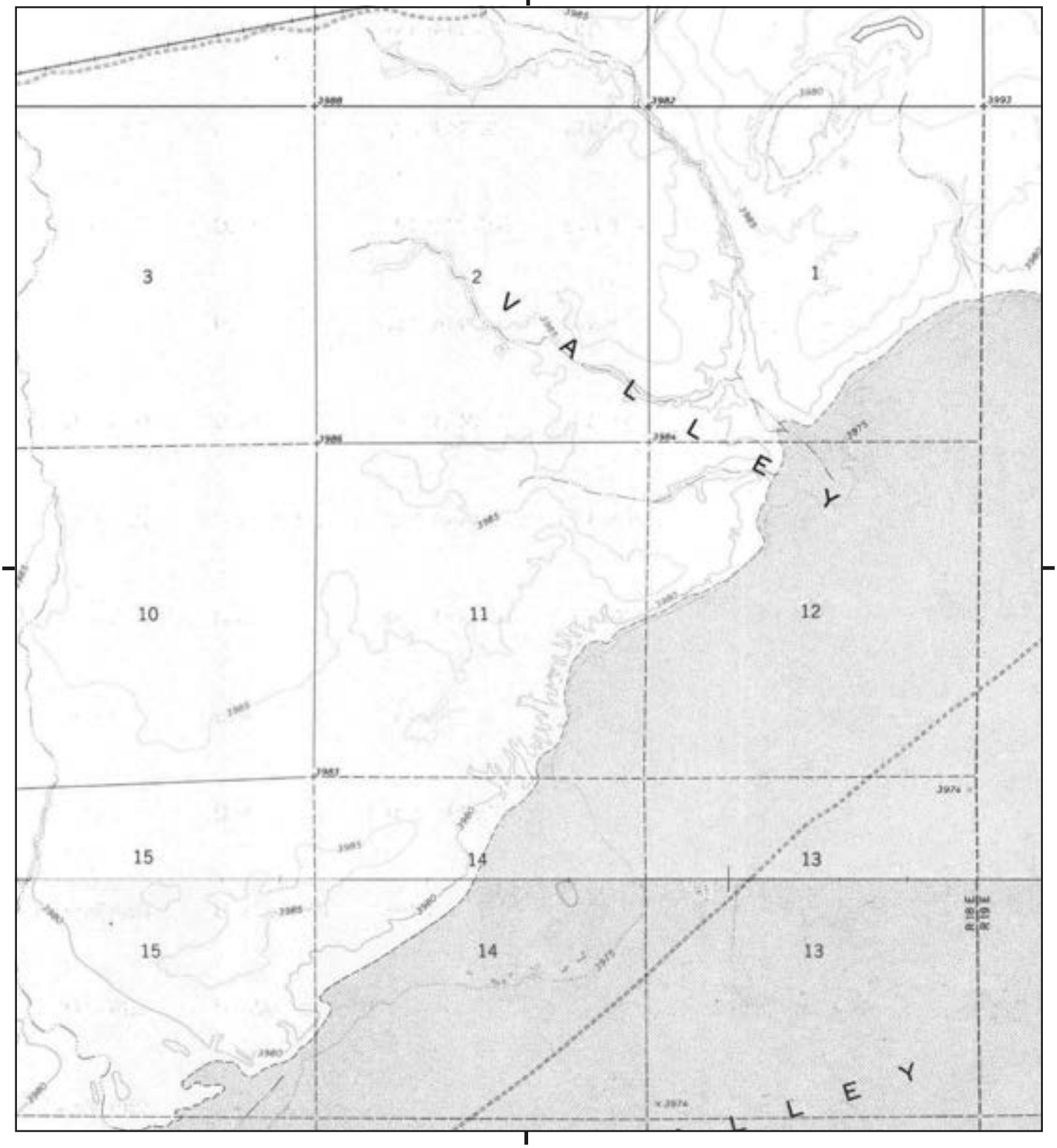
0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Flanigan, 1974, 7.5-minute

SITE NAME: Robert Simmons Solar
ADDRESS: Fish Springs Road
Empire, NV 89405
CLIENT: McGinley Associates

N



This report includes information from the following map sheet(s).

0 Miles 0.25 0.5 1 1.5

NW N NE
W E
SW S SE

TP, Flanigan, 1964, 7.5-minute
S, State Line Peak, 1964, 7.5-minute

SITE NAME: Robert Simmons Solar
ADDRESS: Fish Springs Road
Empire, NV 89405
CLIENT: McGinley Associates

N

Robert Simmons Solar
Fish Springs Road
Empire, NV 89405

Inquiry Number: 7840954.3
December 06, 2024

Certified Sanborn® Map Report

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

12/06/24

Site Name:

Robert Simmons Solar
Fish Springs Road
Empire, NV 89405
EDR Inquiry # 7840954.3

Client Name:

McGinley Associates
5410 Longley Lane
Reno, NV 89511
Contact: Anna Henry, E.I., C.E.M. #2497

The Sanborn Library has been searched by EDR and maps covering the target property location as provided by McGinley Associates were identified for the years listed below. The Sanborn Library is the largest, most complete collection of fire insurance maps. The collection includes maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow, and others. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by the Sanborn Library LLC, the copyright holder for the collection. Results can be authenticated by visiting www.edrnet.com/sanborn.

The Sanborn Library is continually enhanced with newly identified map archives. This report accesses all maps in the collection as of the day this report was generated.

Certified Sanborn Results:

Certification # 77A5-493C-B108

PO # NA

Project UES082

UNMAPPED PROPERTY

This report certifies that the complete holdings of the Sanborn Library, LLC collection have been searched based on client supplied target property information, and fire insurance maps covering the target property were not found.

Sanborn® Library search results

Certification #: 77A5-493C-B108

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- ☑ Library of Congress
- ☑ University Publications of America
- ☑ EDR Private Collection

The Sanborn Library LLC Since 1866™

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Robert Simmons Solar
Fish Springs Road
Empire, NV 89405

Inquiry Number: 7840954.5
December 05, 2024

The EDR-City Directory Image Report

Environmental Data Resources Inc

6 Armstrong Road
Shelton, CT 06484
800.352.0050
www.edrnet.com

TABLE OF CONTENTS

SECTION

Executive Summary

Findings

City Directory Images

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with any questions or comments.

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EXECUTIVE SUMMARY

DESCRIPTION

Environmental Data Resources, Inc.'s (EDR) City Directory Report is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's City Directory Report includes a search of available business directory data at approximately five year intervals.

RECORD SOURCES

The EDR City Directory Report accesses a variety of business directory sources, including Haines, InfoUSA, Polk, Cole, Bresser, and Stewart. Listings marked as EDR Digital Archive access Cole and InfoUSA records. The various directory sources enhance and complement each other to provide a more thorough and accurate report.

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RESEARCH SUMMARY

The following research sources were consulted in the preparation of this report. A check mark indicates where information was identified in the source and provided in this report.

Year	*Target Street*	*Cross Street*	*Source*
2020	☑	☐	EDR Digital Archive
2017	☐	☐	Cole Information
2014	☑	☐	Cole Information
2010	☑	☐	Cole Information
2005	☑	☐	Cole Information
2000	☐	☐	Cole Information
1995	☐	☐	Cole Information
1992	☐	☐	Cole Information

FINDINGS

TARGET PROPERTY STREET

Fish Springs Road
Empire, NV 89405

Year	*CD Image*	*Source*	
FISH SPRINGS RD			
2020	pg A1	EDR Digital Archive	
2017	-	Cole Information	Street not listed in Source
2014	pg A2	Cole Information	
2010	pg A3	Cole Information	
2005	pg A4	Cole Information	
2000	-	Cole Information	Street not listed in Source
1995	-	Cole Information	Street not listed in Source
1992	-	Cole Information	Street not listed in Source

FINDINGS

CROSS STREETS

No Cross Streets Identified

City Directory Images

Target Street	Cross Street	Source
✔	-	EDR Digital Archive

FISH SPRINGS RD 2020

1	Boyd Burner
10101	Nathan Anderson
76200	Mitchell Romero

Target Street	Cross Street	Source
✔	-	Cole Information

FISH SPRINGS RD 2014

1	OCCUPANT UNKNOWN,
8	OCCUPANT UNKNOWN,
9860	OCCUPANT UNKNOWN,
73955	OCCUPANT UNKNOWN,

Target Street	Cross Street	Source
✔	-	Cole Information

FISH SPRINGS RD 2010

73955 BRACKENBURY, JARED L

Target Street	Cross Street	Source
✔	-	Cole Information

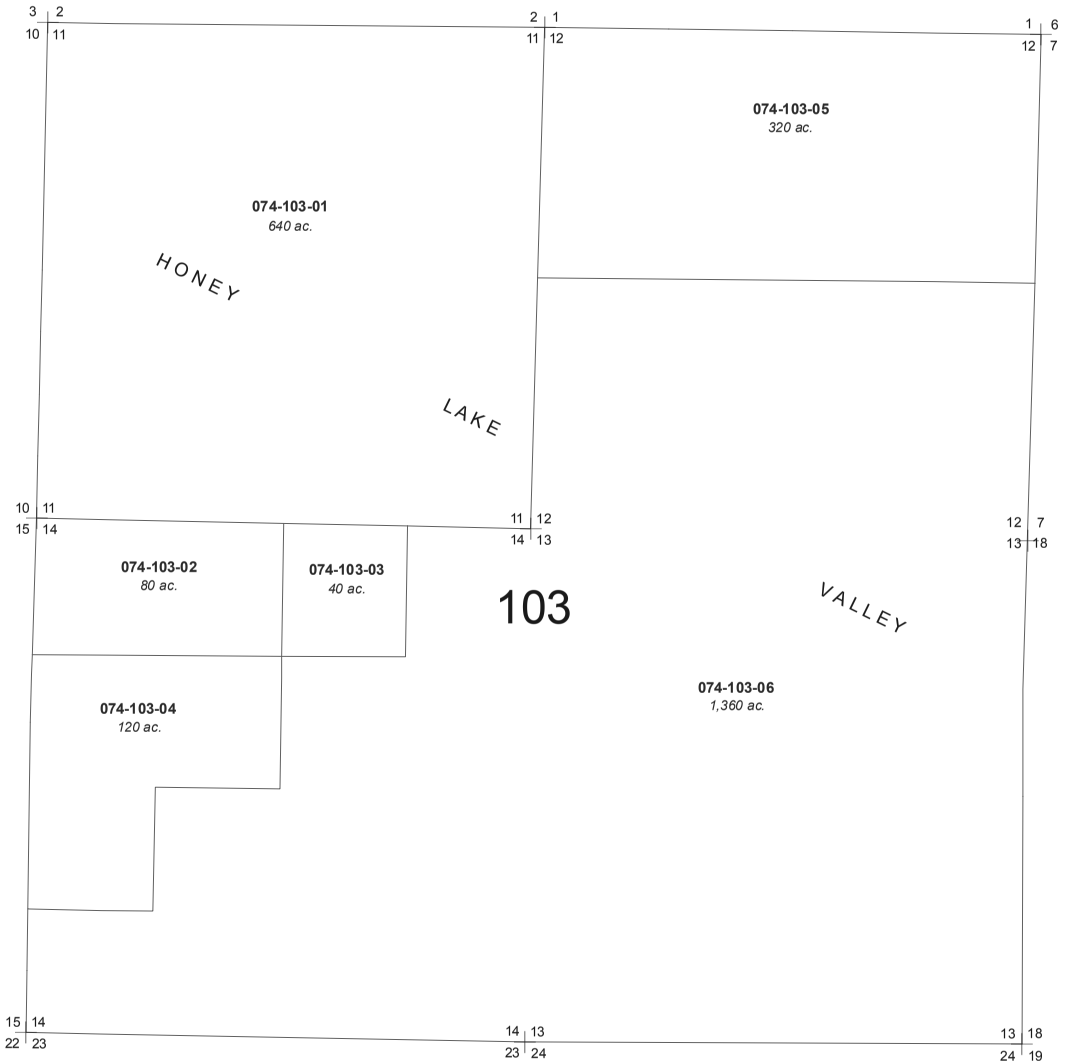
FISH SPRINGS RD 2005

1	FARIAS, ALLEN P

ASSESSOR'S MAP AND PARCEL INFORMATION

Grounded in Excellence

SECTIONS 11, 12, 13 & 14
T26N - R18E



Assessor's Map Number

074-10

STATE OF NEVADA

WASHOE COUNTY
ASSESSOR'S OFFICE

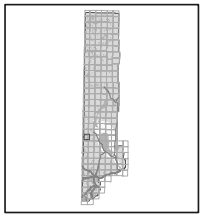
Joshua G. Wilson, Assessor

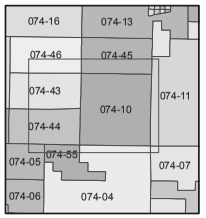
1001 East Ninth Street
Building D
Reno, Nevada 89512
(775) 328-2231



Feet
0 330 660 990 1,320

1 inch = 1,320 feet





created by: TWT 1/7/2011

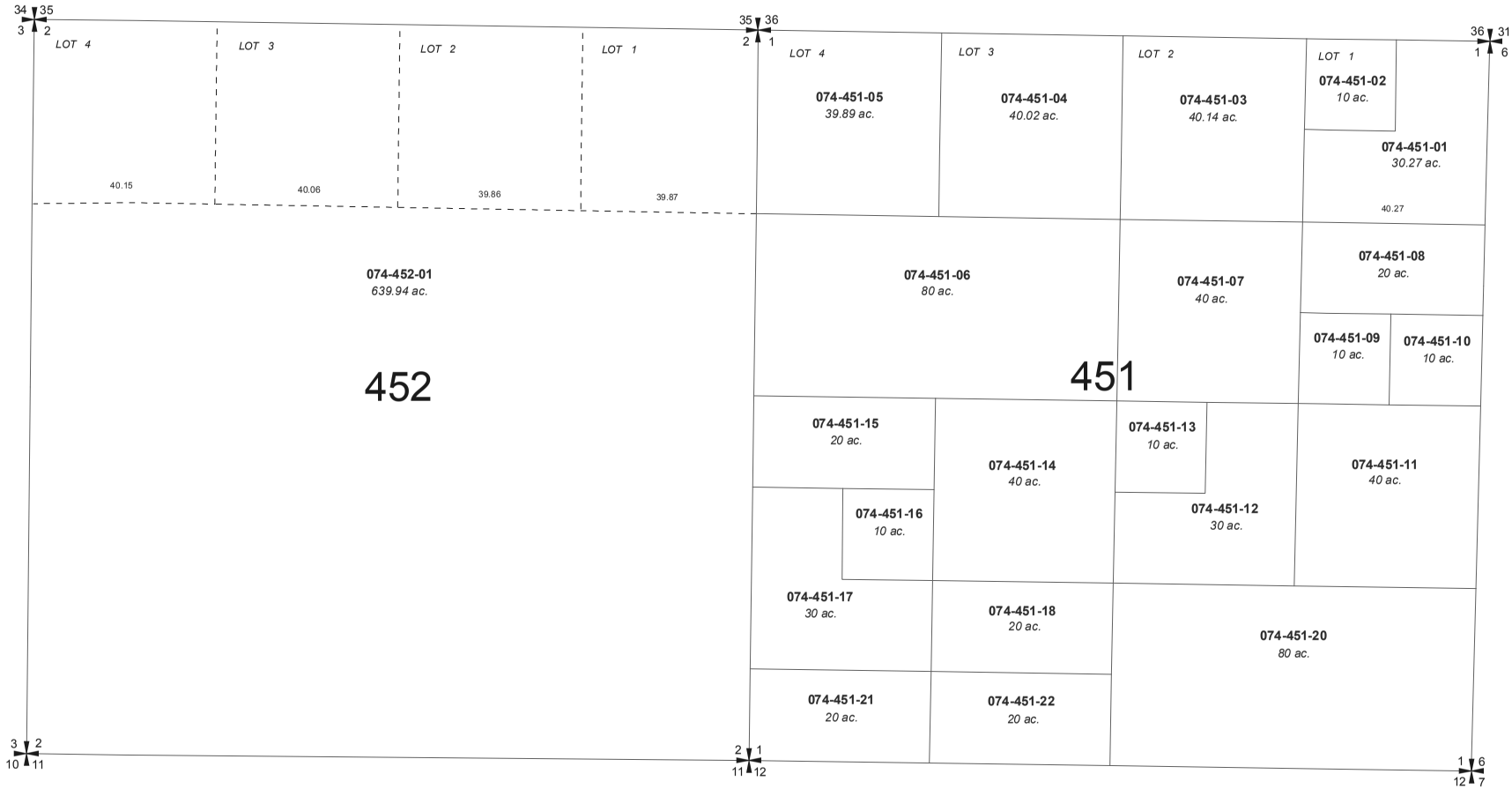
last updated: _____

area previously shown on map(s)

_____

NOTE: This map was prepared for the use of the Washoe County Assessor for assessment and illustrative purposes only. It does not represent a survey of the premises. No liability is assumed as to the sufficiency or accuracy of the data delineated hereon.

SECTIONS 1 & 2
T26N - R18E



Assessor's Map Number

074-45

STATE OF NEVADA

WASHOE COUNTY
ASSESSOR'S OFFICE

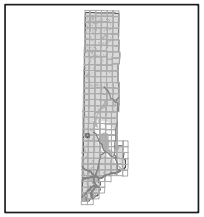
Joshua G. Wilson, Assessor

1001 East Ninth Street
Building D
Reno, Nevada 89512
(775) 328-2231



Feet
0 200 400 600 800

1 inch = 800 feet





created by: TWT 1/5/2011

last updated: _____

area previously shown on map(s)

_____

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WASHOE COUNTY ASSESSOR PROPERTY DATA 12/9/2024

Owner Information

APN	**074-103-01**	Card 1 of 1
Situs 1	0 UNSPECIFIED WASHOE COUNTY NV 89510	Bld #
Owner 1	SIMMONS, ROBERT	et al (AND OTHERS)
Owner 2 or Trustee	LUTTRELL, MICHEL	
Mail Address	27308 FAIRVIEW AVE HAYWARD CA 94542	

Parcel Information

Keyline Desc	SEC 11 TWP 26N RGE 18E		
Subdivision	_UNSPECIFIED		
	Section 11 **Township** 26 **Range** 18		
Record of Survey Map : **Parcel Map#** 0 : **Sub Map#**			
Special Property Code			
2025 Tax District	9000	**Prior APN**	
2024 Tax District	9000	**Tax Cap Status**	Use does not qualify for Low Cap, High Cap Applied

Building Information

XFOB SUBAREA

Bld #1 Situs	0 UNSPECIFIED	**Property Name**	
Quality		**Building Type**	
Stories		**2nd Occupancy**	
Year Built	0	**WAY**	0
Bedrooms	0	**Square Feet**	
Full Baths	0	**Finished Bsmt**	0
Half Baths	0	**Unfin Bsmt**	0
Fixtures		**Basement Type**	
Fireplaces	0	**Gar Conv Sq Feet**	0
Heat Type		**Total Garage Area**	0
2nd Heat Type		**Garage Type**	
Exterior Walls		**Detached Garage**	0
2nd Ext Walls		**Basement Gar Door**	0
Roof Cover		**Sub Floor**	
% Complete	0	**Frame**	
Obso/Bldg Adj	0	**Units/Bldg**	0
Construction Modifier		**Units/Parcel**	0

SubAreas

Bld - Sec	Code	Description	Occupancy	Year Built	Year Eff	SqFt

XFOBs

Code	Description	Quality	Year	Units

Land Information

LAND DETAILS

Land Use	120	**DOR Code**	120	**Sewer**	None	**Neighborhood**	KAAZ	KA Neighborhood Map
Size	27,878,400 SqFt	**Size**	640 Acres	**Street**	None	**Zoning Code**	GR	
CAGC	-			**Water**	None			

Sales and Transfer Records

RECORDER SEARCH

Grantor	Grantee	Doc #	Doc Type	Doc Date	DOR Code	Value/Sale Price	Sale Code	Note
BABYLON HOLDINGS LLC	SIMMONS, ROBERT LUTTRELL, MICHEL	5162104	DEED	04-05-2021	120	659,870	1MGA	
MAY TRUST, RAYMOND D	BABYLON HOLDINGS LLC	4026997	DEED	07-29-2011		50,000	2MSV	
MAY, RAYMOND D	MAY TRUST,RAYMOND D	2949266	QC	11-04-2003	120	0	3NTT	
	MAY,RAYMOND D	1997631		05-24-1996	120	0		
		CHK		04-01-1988		128,000	1GCR	

Valuation Information The 2025/2026 values are preliminary values and subject to change.

	Taxable Land	New Value	Taxable Imps	OBSO	Tax Cap Value	Taxable Total	Land Assessed	Imps Assessed	Total Assessed	Exemption Value
2025/26 VN	41,600	0	0	0		41,600	14,560	0	14,560	0
2024/25 FV	38,400	0	0	0	35,994	38,400	13,440	0	13,440	0

If the property sketch is not available on-line you can obtain a copy by calling (775) 328-2277 or send an email to exemptions@washoecounty.gov with 'Sketch Request' in the subject line. Please include the APN.

Photos are not available for this Parcel.

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WASHOE COUNTY ASSESSOR PROPERTY DATA 12/9/2024

Owner Information

APN	**074-103-05**	Card 1 of 1
Situs 1	0 UNSPECIFIED WASHOE COUNTY NV 89510	Bld #
Owner 1	SIMMONS, ROBERT	et al (AND OTHERS)
Owner 2 or Trustee	LUTTRELL, MICHEL	
Mail Address	27308 FAIRVIEW AVE HAYWARD CA 94542	

Parcel Information

Keyline Desc	N2 SEC 12 TWP 26 RGE 18		
Subdivision	_UNSPECIFIED		
	Section 12 **Township** 26 **Range** 18		
Record of Survey Map : **Parcel Map#** : **Sub Map#**			
Special Property Code			
2025 Tax District	9000	**Prior APN**	
2024 Tax District	9000	**Tax Cap Status**	Use does not qualify for Low Cap, High Cap Applied

Building Information

XFOB SUBAREA

Bld #1 Situs	0 UNSPECIFIED	**Property Name**	
Quality		**Building Type**	
Stories		**2nd Occupancy**	
Year Built	0	**WAY**	0
Bedrooms	0	**Square Feet**	
Full Baths	0	**Finished Bsmt**	0
Half Baths	0	**Unfin Bsmt**	0
Fixtures		**Basement Type**	
Fireplaces	0	**Gar Conv Sq Feet**	0
Heat Type		**Total Garage Area**	0
2nd Heat Type		**Garage Type**	
Exterior Walls		**Detached Garage**	0
2nd Ext Walls		**Basement Gar Door**	0
Roof Cover		**Sub Floor**	
% Complete	0	**Frame**	
Obso/Bldg Adj	0	**Units/Bldg**	0
Construction Modifier		**Units/Parcel**	0

SubAreas

Bld - Sec	Code	Description	Occupancy	Year Built	Year Eff	SqFt

XFOBs

Code	Description	Quality	Year	Units

Land Information

LAND DETAILS

Land Use	120	**DOR Code**	120	**Sewer**	None	**Neighborhood**	KAAZ	KA Neighborhood Map
Size	13,939,200 SqFt	**Size**	320 Acres	**Street**	None	**Zoning Code**	GR	
CAGC	-			**Water**	None			

Sales and Transfer Records

RECORDER SEARCH

Grantor	Grantee	Doc #	Doc Type	Doc Date	DOR Code	Value/Sale Price	Sale Code	Note
BABYLON HOLDINGS LLC	SIMMONS, ROBERT LUTTRELL, MICHEL	5162104	DEED	04-05-2021	120	659,870	1MGA	
CEDARS OF LEBANON MT SINAI HOS,	BABYLON HOLDINGS LLC	4040918	CORR	09-15-2011	120	14,000	2MSV	SVL-VERIFIED; INCLDS 074-103-05 & 451-20 OWNER ESTIMATED PAYING $40. PER ACRE.

								DEED 4040918 CORRECTS DEED 4035466 LEGAL DESCRIPTION
CEDARS OF LEBANON MT SINAI HOS,	CEDARS OF LEBANON MT SINAI HOS	4035466	DEED	08-29-2011	120	14,000	3BO	SVL; REDFILE#/LTR SENT/INCORRECT LEGAL DESCRIP , CAN NOT TRANSFER. SEE CORRECTED DEED 4040918 INCLDS 074-103-05 & 074-451-20
	CEDARS OF LEBANON MT SINAI HOS	MEMO		09-10-1979		0		

Valuation Information The 2025/2026 values are preliminary values and subject to change.

	Taxable Land	New Value	Taxable Imps	OBSO	Tax Cap Value	Taxable Total	Land Assessed	Imps Assessed	Total Assessed	Exemption Value
2025/26 VN	32,000	0	0	0		32,000	11,200	0	11,200	0
2024/25 FV	25,600	0	0	0	22,496	25,600	8,960	0	8,960	0

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WASHOE COUNTY ASSESSOR PROPERTY DATA 12/9/2024

Owner Information

APN	**074-451-20**	Card 1 of 1
Situs 1	0 UNSPECIFIED WASHOE COUNTY NV 89510	Bld #
Owner 1	SIMMONS, ROBERT	et al (AND OTHERS)
Owner 2 or Trustee	LUTTRELL, MICHEL	
Mail Address	27308 FAIRVIEW AVE HAYWARD CA 94542	

Parcel Information

Keyline Desc	S2 SE4 SEC 1 TWP 26 RGE 18		
Subdivision	_UNSPECIFIED		
	Section 1 **Township** 26 **Range** 18		
Record of Survey Map : **Parcel Map#** : **Sub Map#**			
Special Property Code			
2025 Tax District	9000	**Prior APN**	
2024 Tax District	9000	**Tax Cap Status**	Use does not qualify for Low Cap, High Cap Applied

Building Information

XFOB SUBAREA

Bld #1 Situs	0 UNSPECIFIED	**Property Name**	
Quality		**Building Type**	
Stories		**2nd Occupancy**	
Year Built	0	**WAY**	0
Bedrooms	0	**Square Feet**	
Full Baths	0	**Finished Bsmt**	0
Half Baths	0	**Unfin Bsmt**	0
Fixtures		**Basement Type**	
Fireplaces	0	**Gar Conv Sq Feet**	0
Heat Type		**Total Garage Area**	0
2nd Heat Type		**Garage Type**	
Exterior Walls		**Detached Garage**	0
2nd Ext Walls		**Basement Gar Door**	0
Roof Cover		**Sub Floor**	
% Complete	0	**Frame**	
Obso/Bldg Adj	0	**Units/Bldg**	0
Construction Modifier		**Units/Parcel**	0

SubAreas

Bld - Sec	Code	Description	Occupancy	Year Built	Year Eff	SqFt

XFOBs

Code	Description	Quality	Year	Units

Land Information

LAND DETAILS

Land Use	120	**DOR Code**	120	**Sewer**	None	**Neighborhood**	KAAZ	KA Neighborhood Map
Size	3,484,800 SqFt	**Size**	80 Acres	**Street**	None	**Zoning Code**	GR	
CAGC	-			**Water**	None			

Sales and Transfer Records

RECORDER SEARCH

Grantor	Grantee	Doc #	Doc Type	Doc Date	DOR Code	Value/Sale Price	Sale Code	Note
BABYLON HOLDINGS LLC	SIMMONS, ROBERT LUTTRELL, MICHEL	5162104	DEED	04-05-2021	120	659,870	1MGA	
CEDARS OF LEBANON MT SINAI HOS,	BABYLON HOLDINGS LLC	4040918	CORR	09-15-2011	120	14,000	2MSV	SVL-VERIFIED; INCLDS 074-103-05 & 451-20 OWNER ESTIMATED PAYING $40. PER ACRE. DEED 4040918

								CORRECTS DEED 4035466 LEGAL DESCRIPTION
CEDARS OF LEBANON MT SINAI HOS,	CEDARS OF LEBANON MT SINAI HOS	4035466	DEED	08-29-2011	120	14,000	3BO	SVL; REDFILE#/LTR SENT/INCORRECT LEGAL DESCRIP , CAN NOT TRANSFER. SEE CORRECTED DEED 4040918 INCLDS 074-103-05 & 074-451-20
	CEDARS OF LEBANON MT SINAI HOS	MEMO		09-10-1979		0		

Valuation Information The 2025/2026 values are preliminary values and subject to change.

	Taxable Land	New Value	Taxable Imps	OBSO	Tax Cap Value	Taxable Total	Land Assessed	Imps Assessed	Total Assessed	Exemption Value
2025/26 VN	22,000	0	0	0		22,000	7,700	0	7,700	0
2024/25 FV	17,200	0	0	0	12,098	17,200	6,020	0	6,020	0

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WASHOE COUNTY ASSESSOR PROPERTY DATA 12/9/2024

Owner Information

APN	**074-452-01**	Card 1 of 1
Situs 1	0 UNSPECIFIED WASHOE COUNTY NV 89510	Bld #
Owner 1	SIMMONS, ROBERT	et al (AND OTHERS)
Owner 2 or Trustee	LUTTRELL, MICHEL	
Mail Address	27308 FAIRVIEW AVE HAYWARD CA 94542	

Parcel Information

Keyline Desc	SEC 2 TWP 26N RGE 18E		
Subdivision	_UNSPECIFIED		
	Section 2 **Township** 26 **Range** 18		
Record of Survey Map : **Parcel Map#** 0 : **Sub Map#**			
Special Property Code			
2025 Tax District	9000	**Prior APN**	
2024 Tax District	9000	**Tax Cap Status**	Use does not qualify for Low Cap, High Cap Applied

Building Information

XFOB SUBAREA

Bld #1 Situs	0 UNSPECIFIED	**Property Name**	
Quality		**Building Type**	
Stories		**2nd Occupancy**	
Year Built	0	**WAY**	0
Bedrooms	0	**Square Feet**	
Full Baths	0	**Finished Bsmt**	0
Half Baths	0	**Unfin Bsmt**	0
Fixtures		**Basement Type**	
Fireplaces	0	**Gar Conv Sq Feet**	0
Heat Type		**Total Garage Area**	0
2nd Heat Type		**Garage Type**	
Exterior Walls		**Detached Garage**	0
2nd Ext Walls		**Basement Gar Door**	0
Roof Cover		**Sub Floor**	
% Complete	0	**Frame**	
Obso/Bldg Adj	0	**Units/Bldg**	0
Construction Modifier		**Units/Parcel**	0

SubAreas

Bld - Sec	Code	Description	Occupancy	Year Built	Year Eff	SqFt

XFOBs

Code	Description	Quality	Year	Units

Land Information

LAND DETAILS

Land Use	120	**DOR Code**	120	**Sewer**	None	**Neighborhood**	KAAZ	KA Neighborhood Map
Size	27,875,786.4 SqFt	**Size**	639.94 Acres	**Street**	None	**Zoning Code**	GR	
CAGC	-			**Water**	None			

Sales and Transfer Records

RECORDER SEARCH

Grantor	Grantee	Doc #	Doc Type	Doc Date	DOR Code	Value/Sale Price	Sale Code	Note
BABYLON HOLDINGS LLC	SIMMONS, ROBERT LUTTRELL, MICHEL	5162104	DEED	04-05-2021	120	659,870	1MGA	
MAY TRUST, RAYMOND D	BABYLON HOLDINGS LLC	4026997	DEED	07-29-2011		50,000	2MSV	SVL-VERIFIED. PURCHASED 074-103-01 & 074-452-01 FOR $25,000 EACH.TOTAL PURCHASE PRICE $50,000.

MAY, RAYMOND D	MAY TRUST,RAYMOND D	2949266	QC	11-04-2003	120	0	3NTT	
	MAY,RAYMOND D	1239517		04-15-1988	120	0		
		CHK		04-01-1988		128,000	1GCR	

Valuation Information

The 2025/2026 values are preliminary values and subject to change.

	Taxable Land	New Value	Taxable Imps	OBSO	Tax Cap Value	Taxable Total	Land Assessed	Imps Assessed	Total Assessed	Exemption Value
2025/26 VN	41,596	0	0	0		41,596	14,558	0	14,559	0
2024/25 FV	38,396	0	0	0	35,991	38,396	13,438	0	13,439	0

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RADIUS MAP REPORT

Grounded in Excellence

Robert Simmons Solar
Fish Springs Road
Empire, NV 89405

Inquiry Number: 7840954.2s
December 05, 2024

The EDR Radius Map™ Report with GeoCheck®

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

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Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E1527 - 21), the ASTM Standard Practice for Environmental Site Assessments for Forestland or Rural Property (E2247 - 16), the ASTM Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (E1528 - 22) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

FISH SPRINGS ROAD
EMPIRE, NV 89405

COORDINATES

Latitude (North):	40.1384740 - 40˚ 8' 18.50''
Longitude (West):	119.9290640 - 119˚ 55' 44.63''
Universal Tranverse Mercator:	Zone 11
UTM X (Meters):	250456.6
UTM Y (Meters):	4447030.0
Elevation:	3988 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map:	50001630 FLANIGAN, NV
Version Date:	2021
South Map:	50002496 STATE LINE PEAK, NV
Version Date:	2021

AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from:	20200701, 20190812
Source:	USDA

MAPPED SITES SUMMARY

Target Property Address:
FISH SPRINGS ROAD
EMPIRE, NV 89405

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION

NO MAPPED SITES FOUND

EXECUTIVE SUMMARY

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

STANDARD ENVIRONMENTAL RECORDS

Lists of Federal NPL (Superfund) sites

NPL ---- National Priority List
Proposed NPL ---- Proposed National Priority List Sites
NPL LIENS ---- Federal Superfund Liens

Lists of Federal Delisted NPL sites

Delisted NPL ---- National Priority List Deletions

Lists of Federal sites subject to CERCLA removals and CERCLA orders

FEDERAL FACILITY ---- Federal Facility Site Information listing
SEMS ---- Superfund Enterprise Management System

Lists of Federal CERCLA sites with NFRAP

SEMS-ARCHIVE ---- Superfund Enterprise Management System Archive

Lists of Federal RCRA facilities undergoing Corrective Action

CORRACTS ---- Corrective Action Report

Lists of Federal RCRA TSD facilities

RCRA-TSDF ---- RCRA - Treatment, Storage and Disposal

Lists of Federal RCRA generators

RCRA-LQG ---- RCRA - Large Quantity Generators
RCRA-SQG ---- RCRA - Small Quantity Generators
RCRA-VSQG ---- RCRA - Very Small Quantity Generators (Formerly Conditionally Exempt Small Quantity Generators)

Federal institutional controls / engineering controls registries

LUCIS ---- Land Use Control Information System

US ENG CONTROLS Engineering Controls Sites List
US INST CONTROLS Institutional Controls Sites List

Federal ERNS list

ERNS Emergency Response Notification System

Lists of state- and tribal hazardous waste facilities

SHWS Sites Database

Lists of state and tribal landfills and solid waste disposal facilities

SWF/LF Landfill List

Lists of state and tribal leaking storage tanks

LUST Sites Database
INDIAN LUST Leaking Underground Storage Tanks on Indian Land

Lists of state and tribal registered storage tanks

FEMA UST Underground Storage Tank Listing
UST Underground Storage Tank List
AST Aboveground Storage Tank List
INDIAN UST Underground Storage Tanks on Indian Land

Lists of state and tribal voluntary cleanup sites

VCP Voluntary Cleanup Program Sites
INDIAN VCP Voluntary Cleanup Priority Listing

Lists of state and tribal brownfield sites

BROWNFIELDS Project Tracking Database

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

SWRCY Recycling Information Listing
INDIAN ODI Report on the Status of Open Dumps on Indian Lands
ODI Open Dump Inventory
DEBRIS REGION 9 Torres Martinez Reservation Illegal Dump Site Locations
IHS OPEN DUMPS Open Dumps on Indian Land

Local Lists of Hazardous waste / Contaminated Sites

US HIST CDL Delisted National Clandestine Laboratory Register
US CDL National Clandestine Laboratory Register

Local Land Records

LIENS 2	CERCLA Lien Information

Records of Emergency Release Reports

HMIRS	Hazardous Materials Information Reporting System

Other Ascertainable Records

RCRA NonGen / NLR	RCRA - Non Generators / No Longer Regulated
FUDS	Formerly Used Defense Sites
DOD	Department of Defense Sites
SCRD DRYCLEANERS	State Coalition for Remediation of Drycleaners Listing
US FIN ASSUR	Financial Assurance Information
EPA WATCH LIST	EPA WATCH LIST
2020 COR ACTION	2020 Corrective Action Program List
TSCA	Toxic Substances Control Act
TRIS	Toxic Chemical Release Inventory System
SSTS	Section 7 Tracking Systems
ROD	Records Of Decision
RMP	Risk Management Plans
RAATS	RCRA Administrative Action Tracking System
PRP	Potentially Responsible Parties
PADS	PCB Activity Database System
ICIS	Integrated Compliance Information System
FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
MLTS	Material Licensing Tracking System
COAL ASH DOE	Steam-Electric Plant Operation Data
COAL ASH EPA	Coal Combustion Residues Surface Impoundments List
PCB TRANSFORMER	PCB Transformer Registration Database
RADINFO	Radiation Information Database
HIST FTTS	FIFRA/TSCA Tracking System Administrative Case Listing
DOT OPS	Incident and Accident Data
CONSENT	Superfund (CERCLA) Consent Decrees
INDIAN RESERV	Indian Reservations
FUSRAP	Formerly Utilized Sites Remedial Action Program
UMTRA	Uranium Mill Tailings Sites
LEAD SMELTERS	Lead Smelter Sites
US AIRS	Aerometric Information Retrieval System Facility Subsystem
US MINES	Mines Master Index File
ABANDONED MINES	Abandoned Mines
MINES MRDS	Mineral Resources Data System
FINDS	Facility Index System/Facility Registry System
ECHO	Enforcement & Compliance History Information
UXO	Unexploded Ordnance Sites
DOCKET HWC	Hazardous Waste Compliance Docket Listing
FUELS PROGRAM	EPA Fuels Program Registered Listing
PFAS NPL	Superfund Sites with PFAS Detections Information
PFAS FEDERAL SITES	Federal Sites PFAS Information
PFAS TSCA	PFAS Manufacture and Imports Information
PFAS TRIS	List of PFAS Added to the TRI
PFAS RCRA MANIFEST	PFAS Transfers Identified In the RCRA Database Listing

PFAS ATSDR	PFAS Contamination Site Location Listing
PFAS WQP	Ambient Environmental Sampling for PFAS
PFAS PROJECT	NORTHEASTERN UNIVERSITY PFAS PROJECT
PFAS NPDES	Clean Water Act Discharge Monitoring Information
PFAS ECHO	Facilities in Industries that May Be Handling PFAS Listing
PFAS ECHO FIRE TRAIN	Facilities in Industries that May Be Handling PFAS Listing
PFAS PT 139 AIRPORT	All Certified Part 139 Airports PFAS Information Listing
AQUEOUS FOAM NRC	Aqueous Foam Related Incidents Listing
BIOSOLIDS	ICIS-NPDES Biosolids Facility Data
UST FINDER RELEASE	UST Finder Releases Database
UST FINDER	UST Finder Database
E MANIFEST	Hazardous Waste Electronic Manifest System
AIRS	Permitted Airs Facility Listing
COAL ASH	Coal Ash Disposal Sites
Financial Assurance	Financial Assurance Information Listing
HMRI	Hazardous Materials Repository Information Data
NPDES	Permitted Facility Listing
PFAS	NDEP PFAS Sampling and Analysis

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP	EDR Proprietary Manufactured Gas Plants
EDR Hist Auto	EDR Exclusive Historical Auto Stations
EDR Hist Cleaner	EDR Exclusive Historical Cleaners

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA HWS	Recovered Government Archive State Hazardous Waste Facilities List
RGA LF	Recovered Government Archive Solid Waste Facilities List
RGA LUST	Recovered Government Archive Leaking Underground Storage Tank

SURROUNDING SITES: SEARCH RESULTS

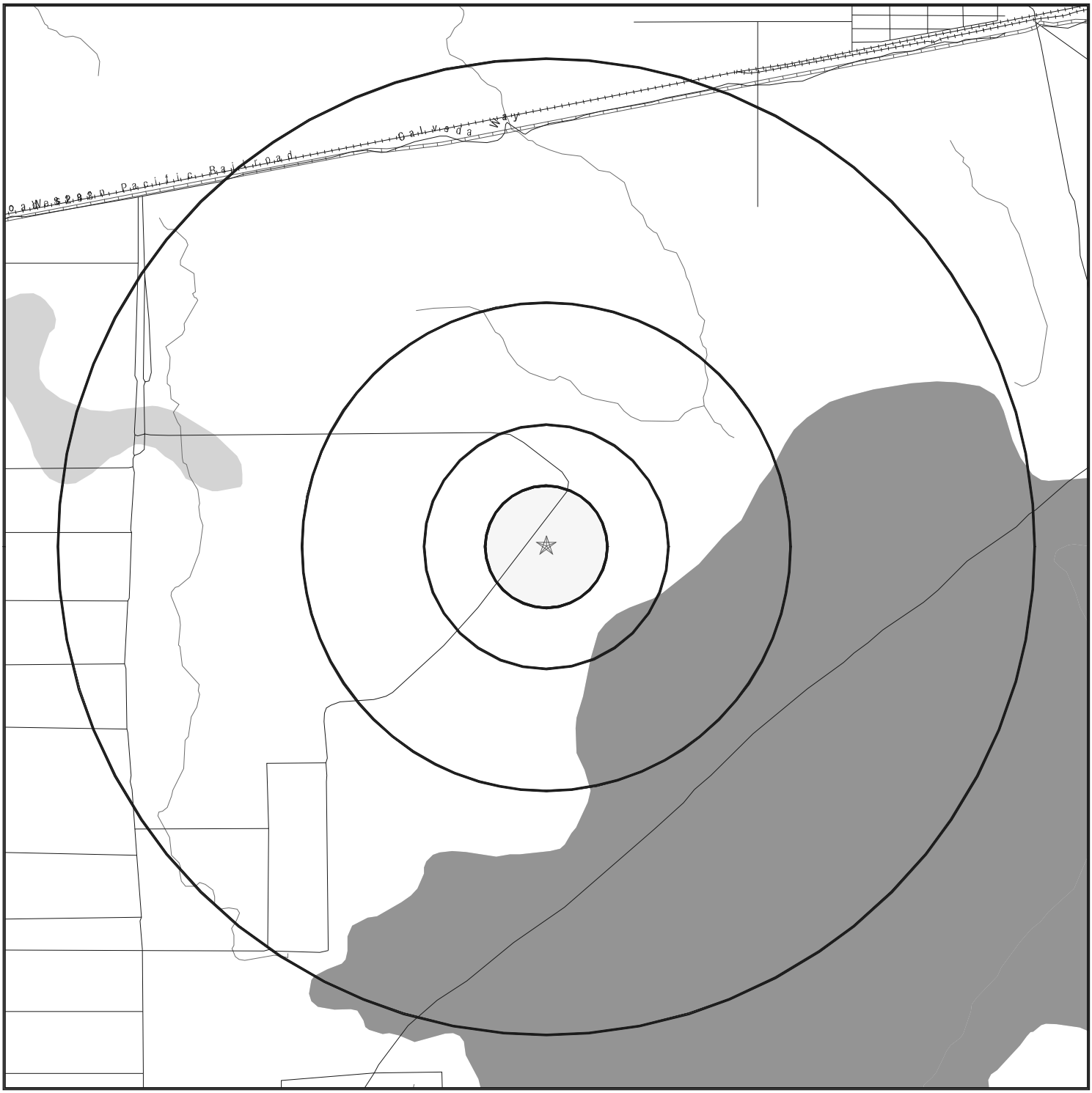
Surrounding sites were not identified.

Unmappable (orphan) sites are not considered in the foregoing analysis.

EXECUTIVE SUMMARY

There were no unmapped sites in this report.

OVERVIEW MAP - 7840954.2S



0 1/2 1 2 Miles

N

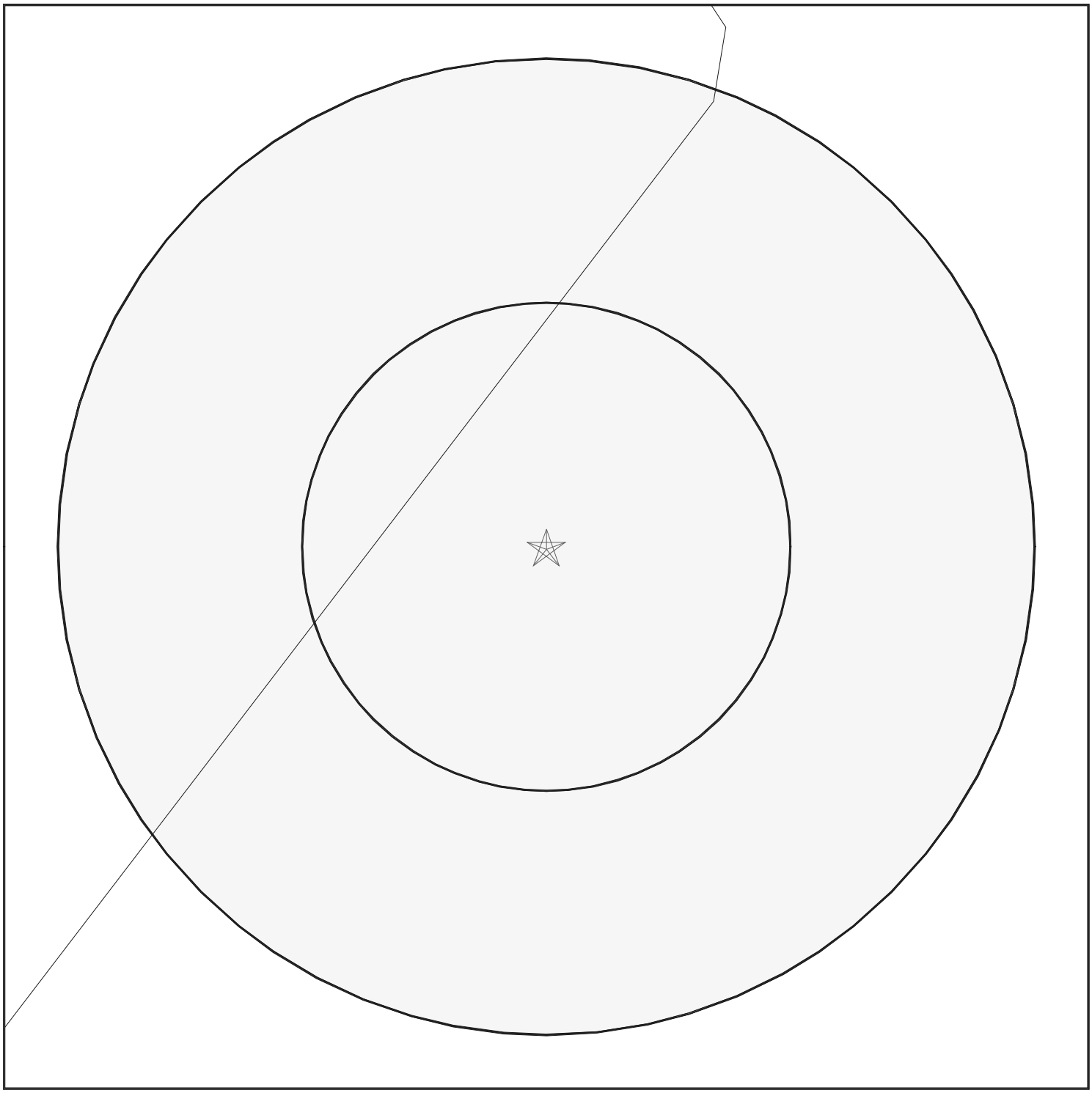
- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Pipelines
- Special Flood Hazard Area (1%)
- 0.2% Annual Chance Flood Hazard
- National Wetland Inventory
- State Wetlands

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME:	Robert Simmons Solar	CLIENT:	McGinley Associates
ADDRESS:	Fish Springs Road Empire NV 89405	CONTACT:	Anna Henry, E.I., C.E.M. #2497, Exp. Date 09/23/20
LAT/LONG:	40.138474 / 119.929064	INQUIRY #:	7840954.2s
		DATE:	December 05, 2024 4:44 pm

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DETAIL MAP - 7840954.2S



Target Property

Sites at elevations higher than or equal to the target property

Sites at elevations lower than the target property

Manufactured Gas Plants

Sensitive Receptors

National Priority List Sites

Dept. Defense Sites

0 1/16 1/8 1/4 Miles

Indian Reservations BIA

Special Flood Hazard Area (1%)

0.2% Annual Chance Flood Hazard

N

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME:	Robert Simmons Solar	CLIENT:	McGinley Associates
ADDRESS:	Fish Springs Road Empire NV 89405	CONTACT:	Anna Henry, E.I., C.E.M. #2497, Exp. Date 09/23/20
LAT/LONG:	40.138474 / 119.929064	INQUIRY #:	7840954.2s
		DATE:	December 05, 2024 4:45 pm

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MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
STANDARD ENVIRONMENTAL RECORDS								
Lists of Federal NPL (Superfund) sites								
NPL	2.000		0	0	0	0	0	0
Proposed NPL	2.000		0	0	0	0	0	0
NPL LIENS	2.000		0	0	0	0	0	0
Lists of Federal Delisted NPL sites								
Delisted NPL	2.000		0	0	0	0	0	0
Lists of Federal sites subject to CERCLA removals and CERCLA orders								
FEDERAL FACILITY	1.500		0	0	0	0	0	0
SEMS	1.500		0	0	0	0	0	0
Lists of Federal CERCLA sites with NFRAP								
SEMS-ARCHIVE	1.500		0	0	0	0	0	0
Lists of Federal RCRA facilities undergoing Corrective Action								
CORRACTS	2.000		0	0	0	0	0	0
Lists of Federal RCRA TSD facilities								
RCRA-TSDF	1.500		0	0	0	0	0	0
Lists of Federal RCRA generators								
RCRA-LQG	1.250		0	0	0	0	0	0
RCRA-SQG	1.250		0	0	0	0	0	0
RCRA-VSQG	1.250		0	0	0	0	0	0
Federal institutional controls / engineering controls registries								
LUCIS	1.500		0	0	0	0	0	0
US ENG CONTROLS	1.500		0	0	0	0	0	0
US INST CONTROLS	1.500		0	0	0	0	0	0
Federal ERNS list								
ERNS	1.000		0	0	0	0	NR	0
Lists of state- and tribal hazardous waste facilities								
SHWS	2.000		0	0	0	0	0	0
Lists of state and tribal landfills and solid waste disposal facilities								
SWF/LF	1.500		0	0	0	0	0	0
Lists of state and tribal leaking storage tanks								
LUST	1.500		0	0	0	0	0	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
INDIAN LUST	1.500		0	0	0	0	0	0
Lists of state and tribal registered storage tanks								
FEMA UST	1.250		0	0	0	0	0	0
UST	1.250		0	0	0	0	0	0
AST	1.250		0	0	0	0	0	0
INDIAN UST	1.250		0	0	0	0	0	0
Lists of state and tribal voluntary cleanup sites								
VCP	1.500		0	0	0	0	0	0
INDIAN VCP	1.500		0	0	0	0	0	0
Lists of state and tribal brownfield sites								
BROWNFIELDS	1.500		0	0	0	0	0	0
ADDITIONAL ENVIRONMENTAL RECORDS								
Local Brownfield lists								
US BROWNFIELDS	1.500		0	0	0	0	0	0
Local Lists of Landfill / Solid Waste Disposal Sites								
SWRCY	1.500		0	0	0	0	0	0
INDIAN ODI	1.500		0	0	0	0	0	0
ODI	1.500		0	0	0	0	0	0
DEBRIS REGION 9	1.500		0	0	0	0	0	0
IHS OPEN DUMPS	1.500		0	0	0	0	0	0
Local Lists of Hazardous waste / Contaminated Sites								
US HIST CDL	1.000		0	0	0	0	NR	0
US CDL	1.000		0	0	0	0	NR	0
Local Land Records								
LIENS 2	1.000		0	0	0	0	NR	0
Records of Emergency Release Reports								
HMIRS	1.000		0	0	0	0	NR	0
Other Ascertainable Records								
RCRA NonGen / NLR	1.250		0	0	0	0	0	0
FUDS	2.000		0	0	0	0	0	0
DOD	2.000		0	0	0	0	0	0
SCRD DRYCLEANERS	1.500		0	0	0	0	0	0
US FIN ASSUR	1.000		0	0	0	0	NR	0
EPA WATCH LIST	1.000		0	0	0	0	NR	0
2020 COR ACTION	1.250		0	0	0	0	0	0
TSCA	1.000		0	0	0	0	NR	0
TRIS	1.000		0	0	0	0	NR	0
SSTS	1.000		0	0	0	0	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
ROD	2.000		0	0	0	0	0	0
RMP	1.000		0	0	0	0	NR	0
RAATS	1.000		0	0	0	0	NR	0
PRP	1.000		0	0	0	0	NR	0
PADS	1.000		0	0	0	0	NR	0
ICIS	1.000		0	0	0	0	NR	0
FTTS	1.000		0	0	0	0	NR	0
MLTS	1.000		0	0	0	0	NR	0
COAL ASH DOE	1.000		0	0	0	0	NR	0
COAL ASH EPA	1.500		0	0	0	0	0	0
PCB TRANSFORMER	1.000		0	0	0	0	NR	0
RADINFO	1.000		0	0	0	0	NR	0
HIST FTTS	1.000		0	0	0	0	NR	0
DOT OPS	1.000		0	0	0	0	NR	0
CONSENT	2.000		0	0	0	0	0	0
INDIAN RESERV	2.000		0	0	0	0	0	0
FUSRAP	2.000		0	0	0	0	0	0
UMTRA	1.500		0	0	0	0	0	0
LEAD SMELTERS	1.000		0	0	0	0	NR	0
US AIRS	1.000		0	0	0	0	NR	0
US MINES	1.250		0	0	0	0	0	0
ABANDONED MINES	1.250		0	0	0	0	0	0
MINES MRDS	1.000		0	0	0	0	NR	0
FINDS	1.000		0	0	0	0	NR	0
ECHO	1.000		0	0	0	0	NR	0
UXO	2.000		0	0	0	0	0	0
DOCKET HWC	1.000		0	0	0	0	NR	0
FUELS PROGRAM	1.250		0	0	0	0	0	0
PFAS NPL	1.250		0	0	0	0	0	0
PFAS FEDERAL SITES	1.250		0	0	0	0	0	0
PFAS TSCA	1.250		0	0	0	0	0	0
PFAS TRIS	1.250		0	0	0	0	0	0
PFAS RCRA MANIFEST	1.250		0	0	0	0	0	0
PFAS ATSDR	1.250		0	0	0	0	0	0
PFAS WQP	1.250		0	0	0	0	0	0
PFAS PROJECT	0.250		0	0	NR	NR	NR	0
PFAS NPDES	1.250		0	0	0	0	0	0
PFAS ECHO	1.250		0	0	0	0	0	0
PFAS ECHO FIRE TRAIN	1.250		0	0	0	0	0	0
PFAS PT 139 AIRPORT	1.250		0	0	0	0	0	0
AQUEOUS FOAM NRC	1.250		0	0	0	0	0	0
BIOSOLIDS	1.000		0	0	0	0	NR	0
UST FINDER RELEASE	1.500		0	0	0	0	0	0
UST FINDER	1.250		0	0	0	0	0	0
E MANIFEST	1.250		0	0	0	0	0	0
AIRS	1.000		0	0	0	0	NR	0
COAL ASH	1.500		0	0	0	0	0	0
Financial Assurance	1.000		0	0	0	0	NR	0
HMRI	1.000		0	0	0	0	NR	0
NPDES	1.000		0	0	0	0	NR	0
PFAS	1.250		0	0	0	0	0	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
EDR HIGH RISK HISTORICAL RECORDS								
EDR Exclusive Records								
EDR MGP	2.000		0	0	0	0	0	0
EDR Hist Auto	1.125		0	0	0	0	0	0
EDR Hist Cleaner	1.125		0	0	0	0	0	0
EDR RECOVERED GOVERNMENT ARCHIVES								
Exclusive Recovered Govt. Archives								
RGA HWS	1.000		0	0	0	0	NR	0
RGA LF	1.000		0	0	0	0	NR	0
RGA LUST	1.000		0	0	0	0	NR	0
- Totals --		0	0	0	0	0	0	0

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number

NO SITES FOUND

Count: 0 records.

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
		NO SITES FOUND			

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Number of Days to Update: Provides confirmation that EDR is reporting records that have been updated within 90 days from the date the government agency made the information available to the public.

STANDARD ENVIRONMENTAL RECORDS

Lists of Federal NPL (Superfund) sites

NPL: National Priority List

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 09/25/2024
Date Data Arrived at EDR: 10/01/2024
Date Made Active in Reports: 10/23/2024
Number of Days to Update: 22

Source: EPA
Telephone: N/A
Last EDR Contact: 12/03/2024
Next Scheduled EDR Contact: 01/06/2025
Data Release Frequency: Quarterly

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)
Telephone: 202-564-7333

EPA Region 1
Telephone 617-918-1143

EPA Region 6
Telephone: 214-655-6659

EPA Region 3
Telephone 215-814-5418

EPA Region 7
Telephone: 913-551-7247

EPA Region 4
Telephone 404-562-8033

EPA Region 8
Telephone: 303-312-6774

EPA Region 5
Telephone 312-886-6686

EPA Region 9
Telephone: 415-947-4246

EPA Region 10
Telephone 206-553-8665

Proposed NPL: Proposed National Priority List Sites

A site that has been proposed for listing on the National Priorities List through the issuance of a proposed rule in the Federal Register. EPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.

Date of Government Version: 09/25/2024
Date Data Arrived at EDR: 10/01/2024
Date Made Active in Reports: 10/23/2024
Number of Days to Update: 22

Source: EPA
Telephone: N/A
Last EDR Contact: 12/03/2024
Next Scheduled EDR Contact: 01/06/2025
Data Release Frequency: Quarterly

NPL LIENS: Federal Superfund Liens

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/1991
Date Data Arrived at EDR: 02/02/1994
Date Made Active in Reports: 03/30/1994
Number of Days to Update: 56

Source: EPA
Telephone: 202-564-4267
Last EDR Contact: 08/15/2011
Next Scheduled EDR Contact: 11/28/2011
Data Release Frequency: No Update Planned

Lists of Federal Delisted NPL sites

Delisted NPL: National Priority List Deletions

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 09/25/2024
Date Data Arrived at EDR: 10/01/2024
Date Made Active in Reports: 10/23/2024
Number of Days to Update: 22

Source: EPA
Telephone: N/A
Last EDR Contact: 12/03/2024
Next Scheduled EDR Contact: 01/06/2025
Data Release Frequency: Quarterly

Lists of Federal sites subject to CERCLA removals and CERCLA orders

FEDERAL FACILITY: Federal Facility Site Information listing

A listing of National Priority List (NPL) and Base Realignment and Closure (BRAC) sites found in the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Database where EPA Federal Facilities Restoration and Reuse Office is involved in cleanup activities.

Date of Government Version: 06/07/2024
Date Data Arrived at EDR: 06/25/2024
Date Made Active in Reports: 09/19/2024
Number of Days to Update: 86

Source: Environmental Protection Agency
Telephone: 703-603-8704
Last EDR Contact: 09/24/2024
Next Scheduled EDR Contact: 01/09/2025
Data Release Frequency: Varies

SEMS: Superfund Enterprise Management System

SEMS (Superfund Enterprise Management System) tracks hazardous waste sites, potentially hazardous waste sites, and remedial activities performed in support of EPA's Superfund Program across the United States. The list was formerly know as CERCLIS, renamed to SEMS by the EPA in 2015. The list contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This dataset also contains sites which are either proposed to or on the National Priorities List (NPL) and the sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 09/25/2024
Date Data Arrived at EDR: 10/01/2024
Date Made Active in Reports: 10/23/2024
Number of Days to Update: 22

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 12/03/2024
Next Scheduled EDR Contact: 01/20/2025
Data Release Frequency: Quarterly

Lists of Federal CERCLA sites with NFRAP

SEMS-ARCHIVE: Superfund Enterprise Management System Archive

SEMS-ARCHIVE (Superfund Enterprise Management System Archive) tracks sites that have no further interest under the Federal Superfund Program based on available information. The list was formerly known as the CERCLIS-NFRAP, renamed to SEMS ARCHIVE by the EPA in 2015. EPA may perform a minimal level of assessment work at a site while it is archived if site conditions change and/or new information becomes available. Archived sites have been removed and archived from the inventory of SEMS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list the site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. The decision does not necessarily mean that there is no hazard associated with a given site; it only means that. based upon available information, the location is not judged to be potential NPL site.

Date of Government Version: 09/25/2024
Date Data Arrived at EDR: 10/01/2024
Date Made Active in Reports: 10/23/2024
Number of Days to Update: 22

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 12/03/2024
Next Scheduled EDR Contact: 01/20/2025
Data Release Frequency: Quarterly

Lists of Federal RCRA facilities undergoing Corrective Action

CORRACTS: Corrective Action Report

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 06/03/2024
Date Data Arrived at EDR: 06/07/2024
Date Made Active in Reports: 06/20/2024
Number of Days to Update: 13

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Quarterly

Lists of Federal RCRA TSD facilities

RCRA-TSDF: RCRA - Treatment, Storage and Disposal

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 06/03/2024
Date Data Arrived at EDR: 06/07/2024
Date Made Active in Reports: 06/20/2024
Number of Days to Update: 13

Source: Environmental Protection Agency
Telephone: (415) 495-8895
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Quarterly

Lists of Federal RCRA generators

RCRA-LQG: RCRA - Large Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

Date of Government Version: 06/03/2024
Date Data Arrived at EDR: 06/07/2024
Date Made Active in Reports: 06/20/2024
Number of Days to Update: 13

Source: Environmental Protection Agency
Telephone: (415) 495-8895
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Quarterly

RCRA-SQG: RCRA - Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

Date of Government Version: 06/03/2024
Date Data Arrived at EDR: 06/07/2024
Date Made Active in Reports: 06/20/2024
Number of Days to Update: 13

Source: Environmental Protection Agency
Telephone: (415) 495-8895
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Quarterly

RCRA-VSQG: RCRA - Very Small Quantity Generators (Formerly Conditionally Exempt Small Quantity Generators)

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Very small quantity generators (VSQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

Date of Government Version: 06/03/2024
Date Data Arrived at EDR: 06/07/2024
Date Made Active in Reports: 06/20/2024
Number of Days to Update: 13

Source: Environmental Protection Agency
Telephone: (415) 495-8895
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Quarterly

Federal institutional controls / engineering controls registries

LUCIS: Land Use Control Information System

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties.

Date of Government Version: 07/15/2024
Date Data Arrived at EDR: 07/17/2024
Date Made Active in Reports: 10/09/2024
Number of Days to Update: 84

Source: Department of the Navy
Telephone: 843-820-7326
Last EDR Contact: 11/13/2024
Next Scheduled EDR Contact: 02/17/2025
Data Release Frequency: Varies

US ENG CONTROLS: Engineering Controls Sites List

A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 07/24/2024
Date Data Arrived at EDR: 08/08/2024
Date Made Active in Reports: 08/15/2024
Number of Days to Update: 7

Source: Environmental Protection Agency
Telephone: 703-603-0695
Last EDR Contact: 11/15/2024
Next Scheduled EDR Contact: 12/02/2024
Data Release Frequency: Varies

US INST CONTROLS: Institutional Controls Sites List

A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 07/24/2024
Date Data Arrived at EDR: 08/08/2024
Date Made Active in Reports: 08/15/2024
Number of Days to Update: 7

Source: Environmental Protection Agency
Telephone: 703-603-0695
Last EDR Contact: 11/15/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Varies

Federal ERNS list

ERNS: Emergency Response Notification System

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 06/11/2024
Date Data Arrived at EDR: 06/17/2024
Date Made Active in Reports: 09/04/2024
Number of Days to Update: 79

Source: National Response Center, United States Coast Guard
Telephone: 202-267-2180
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Quarterly

Lists of state- and tribal hazardous waste facilities

SHWS: Sites Database

A listing of correction action sites.

Date of Government Version: 09/09/2024
Date Data Arrived at EDR: 09/10/2024
Date Made Active in Reports: 12/02/2024
Number of Days to Update: 83

Source: Department of Conservation and Natural Resources
Telephone: 775-687-5872
Last EDR Contact: 09/10/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Semi-Annually

Lists of state and tribal landfills and solid waste disposal facilities

SWF/LF: Landfill List

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 08/19/2024
Date Data Arrived at EDR: 08/19/2024
Date Made Active in Reports: 11/04/2024
Number of Days to Update: 77

Source: Department of Conservation and Natural Resources
Telephone: 775-687-5872
Last EDR Contact: 11/18/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Quarterly

Lists of state and tribal leaking storage tanks

LUST: Sites Database

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 09/09/2024
Date Data Arrived at EDR: 09/10/2024
Date Made Active in Reports: 12/02/2024
Number of Days to Update: 83

Source: Department of Conservation and Natural Resources
Telephone: 775-687-5872
Last EDR Contact: 09/10/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Semi-Annually

INDIAN LUST R10: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Alaska, Idaho, Oregon and Washington.

Date of Government Version: 05/07/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 10
Telephone: 206-553-2857
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN LUST R6: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in New Mexico and Oklahoma.

Date of Government Version: 05/07/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 6
Telephone: 214-665-6597
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN LUST R4: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Florida, Mississippi and North Carolina.

Date of Government Version: 05/07/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 4
Telephone: 404-562-8677
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN LUST R9: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Arizona, California, New Mexico and Nevada

Date of Government Version: 05/07/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: Environmental Protection Agency
Telephone: 415-972-3372
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN LUST R7: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Iowa, Kansas, and Nebraska

Date of Government Version: 05/07/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 7
Telephone: 913-551-7003
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN LUST R8: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

Date of Government Version: 05/07/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 8
Telephone: 303-312-6271
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN LUST R1: Leaking Underground Storage Tanks on Indian Land
A listing of leaking underground storage tank locations on Indian Land.

Date of Government Version: 05/07/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 1
Telephone: 617-918-1313
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN LUST R5: Leaking Underground Storage Tanks on Indian Land
Leaking underground storage tanks located on Indian Land in Michigan, Minnesota and Wisconsin.

Date of Government Version: 04/11/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA, Region 5
Telephone: 312-886-7439
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

Lists of state and tribal registered storage tanks

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

FEMA UST: Underground Storage Tank Listing
A listing of all FEMA owned underground storage tanks.

Date of Government Version: 03/15/2024
Date Data Arrived at EDR: 03/19/2024
Date Made Active in Reports: 06/17/2024
Number of Days to Update: 90

Source: FEMA
Telephone: 202-646-5797
Last EDR Contact: 09/25/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

UST: Underground Storage Tank List
Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 09/09/2024
Date Data Arrived at EDR: 09/10/2024
Date Made Active in Reports: 12/02/2024
Number of Days to Update: 83

Source: Department of Conservation and Natural Resources
Telephone: 775-687-5872
Last EDR Contact: 09/10/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Semi-Annually

AST: Aboveground Storage Tank List
Registered Aboveground Storage Tanks.

Date of Government Version: 01/25/2018
Date Data Arrived at EDR: 03/21/2018
Date Made Active in Reports: 04/23/2018
Number of Days to Update: 33

Source: Department of Conservation and Natural Resources
Telephone: 775-687-5872
Last EDR Contact: 09/10/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Semi-Annually

INDIAN UST R1: Underground Storage Tanks on Indian Land
The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 1 (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont and ten Tribal Nations).

Date of Government Version: 05/14/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA, Region 1
Telephone: 617-918-1313
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN UST R4: Underground Storage Tanks on Indian Land
The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 4 (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee and Tribal Nations)

Date of Government Version: 05/14/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 4
Telephone: 404-562-9424
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 07/29/2024
Data Release Frequency: Varies

INDIAN UST R5: Underground Storage Tanks on Indian Land
The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 5 (Michigan, Minnesota and Wisconsin and Tribal Nations).

Date of Government Version: 04/11/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 5
Telephone: 312-886-6136
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN UST R6: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 6 (Louisiana, Arkansas, Oklahoma, New Mexico, Texas and 65 Tribes).

Date of Government Version: 05/14/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 6
Telephone: 214-665-7591
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN UST R9: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 9 (Arizona, California, Hawaii, Nevada, the Pacific Islands, and Tribal Nations).

Date of Government Version: 05/14/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 9
Telephone: 415-972-3368
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN UST R10: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 10 (Alaska, Idaho, Oregon, Washington, and Tribal Nations).

Date of Government Version: 05/14/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 10
Telephone: 206-553-2857
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN UST R7: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 7 (Iowa, Kansas, Missouri, Nebraska, and 9 Tribal Nations).

Date of Government Version: 05/14/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 7
Telephone: 913-551-7003
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

INDIAN UST R8: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 8 (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming and 27 Tribal Nations).

Date of Government Version: 05/14/2024
Date Data Arrived at EDR: 05/30/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 90

Source: EPA Region 8
Telephone: 303-312-6137
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

Lists of state and tribal voluntary cleanup sites

INDIAN VCP R1: Voluntary Cleanup Priority Listing

A listing of voluntary cleanup priority sites located on Indian Land located in Region 1.

Date of Government Version: 07/27/2015
Date Data Arrived at EDR: 09/29/2015
Date Made Active in Reports: 02/18/2016
Number of Days to Update: 142

Source: EPA, Region 1
Telephone: 617-918-1102
Last EDR Contact: 09/10/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Varies

VCP: Voluntary Cleanup Program Sites
The Voluntary Cleanup Program provides relief from liability to owners who undertake cleanups of contaminated properties under the oversight of the Nevada Division of Environmental Protection.

Date of Government Version: 09/09/2024
Date Data Arrived at EDR: 09/10/2024
Date Made Active in Reports: 12/03/2024
Number of Days to Update: 84
Source: Department of Conservation & Natural Resources
Telephone: 775-687-9381
Last EDR Contact: 09/10/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Semi-Annually

INDIAN VCP R7: Voluntary Cleanup Priority Lisitng
A listing of voluntary cleanup priority sites located on Indian Land located in Region 7.

Date of Government Version: 03/20/2008
Date Data Arrived at EDR: 04/22/2008
Date Made Active in Reports: 05/19/2008
Number of Days to Update: 27
Source: EPA, Region 7
Telephone: 913-551-7365
Last EDR Contact: 07/08/2021
Next Scheduled EDR Contact: 07/20/2009
Data Release Frequency: Varies

Lists of state and tribal brownfield sites

BROWNFIELDS: Project Tracking Database
Brownfields sites included in the Project Tracking Database. The term "brownfields" is used to describe abandoned, idled, or underused industrial or commercial properties taken out of productive use because of real or perceived risks from environmental contamination. The State of Nevada has initiated Brownfields, a land-recycling program, to provide an opportunity to redevelop these undesirable properties and revitalize communities.

Date of Government Version: 09/09/2024
Date Data Arrived at EDR: 09/10/2024
Date Made Active in Reports: 12/02/2024
Number of Days to Update: 83
Source: Division of Environmental Protection
Telephone: 775-687-9384
Last EDR Contact: 09/10/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Semi-Annually

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS: A Listing of Brownfields Sites
Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. Assessment, Cleanup and Redevelopment Exchange System (ACRES) stores information reported by EPA Brownfields grant recipients on brownfields properties assessed or cleaned up with grant funding as well as information on Targeted Brownfields Assessments performed by EPA Regions. A listing of ACRES Brownfield sites is obtained from Cleanups in My Community. Cleanups in My Community provides information on Brownfields properties for which information is reported back to EPA, as well as areas served by Brownfields grant programs.

Date of Government Version: 06/10/2024
Date Data Arrived at EDR: 06/11/2024
Date Made Active in Reports: 09/04/2024
Number of Days to Update: 85
Source: Environmental Protection Agency
Telephone: 202-566-2777
Last EDR Contact: 09/11/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Semi-Annually

Local Lists of Landfill / Solid Waste Disposal Sites

SWRCY: Recycling Information Listing
A listing of recycling facilities in Nevada.

Date of Government Version: 08/03/2023
Date Data Arrived at EDR: 11/09/2023
Date Made Active in Reports: 02/06/2024
Number of Days to Update: 89
Source: Department of Environmental Protection
Telephone: 775-687-9463
Last EDR Contact: 10/31/2024
Next Scheduled EDR Contact: 02/17/2025
Data Release Frequency: Varies

INDIAN ODI: Report on the Status of Open Dumps on Indian Lands
Location of open dumps on Indian land.

Date of Government Version: 12/31/1998
Date Data Arrived at EDR: 12/03/2007
Date Made Active in Reports: 01/24/2008
Number of Days to Update: 52

Source: Environmental Protection Agency
Telephone: 703-308-8245
Last EDR Contact: 10/17/2024
Next Scheduled EDR Contact: 02/03/2025
Data Release Frequency: Varies

ODI: Open Dump Inventory
An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Date of Government Version: 06/30/1985
Date Data Arrived at EDR: 08/09/2004
Date Made Active in Reports: 09/17/2004
Number of Days to Update: 39

Source: Environmental Protection Agency
Telephone: 800-424-9346
Last EDR Contact: 06/09/2004
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

DEBRIS REGION 9: Torres Martinez Reservation Illegal Dump Site Locations
A listing of illegal dump sites location on the Torres Martinez Indian Reservation located in eastern Riverside County and northern Imperial County, California.

Date of Government Version: 01/12/2009
Date Data Arrived at EDR: 05/07/2009
Date Made Active in Reports: 09/21/2009
Number of Days to Update: 137

Source: EPA, Region 9
Telephone: 415-947-4219
Last EDR Contact: 11/19/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: No Update Planned

IHS OPEN DUMPS: Open Dumps on Indian Land
A listing of all open dumps located on Indian Land in the United States.

Date of Government Version: 02/07/2024
Date Data Arrived at EDR: 11/13/2024
Date Made Active in Reports: 11/19/2024
Number of Days to Update: 6

Source: Department of Health & Human Serivces, Indian Health Service
Telephone: 301-443-1452
Last EDR Contact: 11/13/2024
Next Scheduled EDR Contact: 02/03/2025
Data Release Frequency: Varies

Local Lists of Hazardous waste / Contaminated Sites

US HIST CDL: National Clandestine Laboratory Register
A listing of clandestine drug lab locations that have been removed from the DEAs National Clandestine Laboratory Register.

Date of Government Version: 05/20/2024
Date Data Arrived at EDR: 08/19/2024
Date Made Active in Reports: 10/09/2024
Number of Days to Update: 51

Source: Drug Enforcement Administration
Telephone: 202-307-1000
Last EDR Contact: 11/22/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: No Update Planned

US CDL: Clandestine Drug Labs
A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 05/20/2024
Date Data Arrived at EDR: 08/19/2024
Date Made Active in Reports: 10/09/2024
Number of Days to Update: 51

Source: Drug Enforcement Administration
Telephone: 202-307-1000
Last EDR Contact: 11/22/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Quarterly

Local Land Records

LIENS 2: CERCLA Lien Information

A Federal CERCLA ('Superfund') lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.

Date of Government Version: 09/25/2024
Date Data Arrived at EDR: 10/01/2024
Date Made Active in Reports: 10/23/2024
Number of Days to Update: 22

Source: Environmental Protection Agency
Telephone: 202-564-6023
Last EDR Contact: 12/03/2024
Next Scheduled EDR Contact: 01/06/2025
Data Release Frequency: Semi-Annually

Records of Emergency Release Reports

HMIRS: Hazardous Materials Information Reporting System

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 06/14/2024
Date Data Arrived at EDR: 06/17/2024
Date Made Active in Reports: 06/24/2024
Number of Days to Update: 7

Source: U.S. Department of Transportation
Telephone: 202-366-4555
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Quarterly

Other Ascertainable Records

RCRA NonGen / NLR: RCRA - Non Generators / No Longer Regulated

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

Date of Government Version: 06/03/2024
Date Data Arrived at EDR: 06/07/2024
Date Made Active in Reports: 06/20/2024
Number of Days to Update: 13

Source: Environmental Protection Agency
Telephone: (415) 495-8895
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Quarterly

FUDS: Formerly Used Defense Sites

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 07/31/2024
Date Data Arrived at EDR: 08/12/2024
Date Made Active in Reports: 10/09/2024
Number of Days to Update: 58

Source: U.S. Army Corps of Engineers
Telephone: 202-528-4285
Last EDR Contact: 11/12/2024
Next Scheduled EDR Contact: 02/24/2025
Data Release Frequency: Varies

DOD: Department of Defense Sites

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 06/07/2021
Date Data Arrived at EDR: 07/13/2021
Date Made Active in Reports: 03/09/2022
Number of Days to Update: 239

Source: USGS
Telephone: 888-275-8747
Last EDR Contact: 10/10/2024
Next Scheduled EDR Contact: 01/20/2025
Data Release Frequency: Varies

FEDLAND: Federal and Indian Lands

Federally and Indian administrated lands of the United States. Lands included are administrated by: Army Corps of Engineers, Bureau of Reclamation, National Wild and Scenic River, National Wildlife Refuge, Public Domain Land, Wilderness, Wilderness Study Area, Wildlife Management Area, Bureau of Indian Affairs, Bureau of Land Management, Department of Justice, Forest Service, Fish and Wildlife Service, National Park Service.

Date of Government Version: 04/02/2018
Date Data Arrived at EDR: 04/11/2018
Date Made Active in Reports: 11/06/2019
Number of Days to Update: 574

Source: U.S. Geological Survey
Telephone: 888-275-8747
Last EDR Contact: 10/03/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: N/A

SCRD DRYCLEANERS: State Coalition for Remediation of Drycleaners Listing

The State Coalition for Remediation of Drycleaners was established in 1998, with support from the U.S. EPA Office of Superfund Remediation and Technology Innovation. It is comprised of representatives of states with established drycleaner remediation programs. Currently the member states are Alabama, Connecticut, Florida, Illinois, Kansas, Minnesota, Missouri, North Carolina, Oregon, South Carolina, Tennessee, Texas, and Wisconsin.

Date of Government Version: 07/30/2021
Date Data Arrived at EDR: 02/03/2023
Date Made Active in Reports: 02/10/2023
Number of Days to Update: 7

Source: Environmental Protection Agency
Telephone: 615-532-8599
Last EDR Contact: 11/04/2024
Next Scheduled EDR Contact: 02/17/2025
Data Release Frequency: Varies

US FIN ASSUR: Financial Assurance Information

All owners and operators of facilities that treat, store, or dispose of hazardous waste are required to provide proof that they will have sufficient funds to pay for the clean up, closure, and post-closure care of their facilities.

Date of Government Version: 06/10/2024
Date Data Arrived at EDR: 06/17/2024
Date Made Active in Reports: 09/04/2024
Number of Days to Update: 79

Source: Environmental Protection Agency
Telephone: 202-566-1917
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Quarterly

EPA WATCH LIST: EPA Watch List

EPA maintains a "Watch List" to facilitate dialogue between EPA, state and local environmental agencies on enforcement matters relating to facilities with alleged violations identified as either significant or high priority. Being on the Watch List does not mean that the facility has actually violated the law only that an investigation by EPA or a state or local environmental agency has led those organizations to allege that an unproven violation has in fact occurred. Being on the Watch List does not represent a higher level of concern regarding the alleged violations that were detected, but instead indicates cases requiring additional dialogue between EPA, state and local agencies - primarily because of the length of time the alleged violation has gone unaddressed or unresolved.

Date of Government Version: 08/30/2013
Date Data Arrived at EDR: 03/21/2014
Date Made Active in Reports: 06/17/2014
Number of Days to Update: 88

Source: Environmental Protection Agency
Telephone: 617-520-3000
Last EDR Contact: 10/24/2024
Next Scheduled EDR Contact: 02/10/2025
Data Release Frequency: No Update Planned

2020 COR ACTION: 2020 Corrective Action Program List

The EPA has set ambitious goals for the RCRA Corrective Action program by creating the 2020 Corrective Action Universe. This RCRA cleanup baseline includes facilities expected to need corrective action. The 2020 universe contains a wide variety of sites. Some properties are heavily contaminated while others were contaminated but have since been cleaned up. Still others have not been fully investigated yet, and may require little or no remediation. Inclusion in the 2020 Universe does not necessarily imply failure on the part of a facility to meet its RCRA obligations.

Date of Government Version: 09/30/2017
Date Data Arrived at EDR: 05/08/2018
Date Made Active in Reports: 07/20/2018
Number of Days to Update: 73

Source: Environmental Protection Agency
Telephone: 703-308-4044
Last EDR Contact: 10/31/2024
Next Scheduled EDR Contact: 02/10/2025
Data Release Frequency: Varies

TSCA: Toxic Substances Control Act

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2020
Date Data Arrived at EDR: 06/14/2022
Date Made Active in Reports: 03/24/2023
Number of Days to Update: 283

Source: EPA
Telephone: 202-260-5521
Last EDR Contact: 10/03/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Every 4 Years

TRIS: Toxic Chemical Release Inventory System

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/2022
Date Data Arrived at EDR: 11/13/2023
Date Made Active in Reports: 02/07/2024
Number of Days to Update: 86

Source: EPA
Telephone: 202-566-0250
Last EDR Contact: 11/14/2024
Next Scheduled EDR Contact: 02/24/2025
Data Release Frequency: Annually

SSTS: Section 7 Tracking Systems

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 07/11/2024
Date Data Arrived at EDR: 07/11/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 1

Source: EPA
Telephone: 202-564-4203
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Annually

ROD: Records Of Decision

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 10/24/2024
Date Data Arrived at EDR: 11/01/2024
Date Made Active in Reports: 11/19/2024
Number of Days to Update: 18

Source: EPA
Telephone: 703-416-0223
Last EDR Contact: 12/03/2024
Next Scheduled EDR Contact: 03/10/2025
Data Release Frequency: Annually

RMP: Risk Management Plans

When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g the fire department) should an accident occur.

Date of Government Version: 07/12/2024
Date Data Arrived at EDR: 07/17/2024
Date Made Active in Reports: 10/09/2024
Number of Days to Update: 84

Source: Environmental Protection Agency
Telephone: 202-564-8600
Last EDR Contact: 10/09/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

RAATS: RCRA Administrative Action Tracking System

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995
Date Data Arrived at EDR: 07/03/1995
Date Made Active in Reports: 08/07/1995
Number of Days to Update: 35

Source: EPA
Telephone: 202-564-4104
Last EDR Contact: 06/02/2008
Next Scheduled EDR Contact: 09/01/2008
Data Release Frequency: No Update Planned

PRP: Potentially Responsible Parties

A listing of verified Potentially Responsible Parties

Date of Government Version: 09/19/2023
Date Data Arrived at EDR: 10/03/2023
Date Made Active in Reports: 10/19/2023
Number of Days to Update: 16

Source: EPA
Telephone: 202-564-6023
Last EDR Contact: 12/03/2024
Next Scheduled EDR Contact: 02/10/2025
Data Release Frequency: Quarterly

PADS: PCB Activity Database System

PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 05/23/2024
Date Data Arrived at EDR: 07/02/2024
Date Made Active in Reports: 09/26/2024
Number of Days to Update: 86

Source: EPA
Telephone: 202-566-0500
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Annually

ICIS: Integrated Compliance Information System

The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

Date of Government Version: 11/18/2016
Date Data Arrived at EDR: 11/23/2016
Date Made Active in Reports: 02/10/2017
Number of Days to Update: 79

Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 09/25/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Quarterly

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/09/2009
Date Data Arrived at EDR: 04/16/2009
Date Made Active in Reports: 05/11/2009
Number of Days to Update: 25
Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-566-1667
Last EDR Contact: 08/18/2017
Next Scheduled EDR Contact: 12/04/2017
Data Release Frequency: No Update Planned

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
A listing of FIFRA/TSCA Tracking System (FTTS) inspections and enforcements.

Date of Government Version: 04/09/2009
Date Data Arrived at EDR: 04/16/2009
Date Made Active in Reports: 05/11/2009
Number of Days to Update: 25
Source: EPA
Telephone: 202-566-1667
Last EDR Contact: 08/18/2017
Next Scheduled EDR Contact: 12/04/2017
Data Release Frequency: No Update Planned

MLTS: Material Licensing Tracking System
MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 10/12/2024
Date Data Arrived at EDR: 10/17/2024
Date Made Active in Reports: 11/19/2024
Number of Days to Update: 33
Source: Nuclear Regulatory Commission
Telephone: 301-415-0717
Last EDR Contact: 10/09/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Quarterly

COAL ASH DOE: Steam-Electric Plant Operation Data
A listing of power plants that store ash in surface ponds.

Date of Government Version: 12/31/2022
Date Data Arrived at EDR: 11/27/2023
Date Made Active in Reports: 02/22/2024
Number of Days to Update: 87
Source: Department of Energy
Telephone: 202-586-8719
Last EDR Contact: 11/20/2024
Next Scheduled EDR Contact: 03/10/2025
Data Release Frequency: Varies

COAL ASH EPA: Coal Combustion Residues Surface Impoundments List
A listing of coal combustion residues surface impoundments with high hazard potential ratings.

Date of Government Version: 01/12/2017
Date Data Arrived at EDR: 03/05/2019
Date Made Active in Reports: 11/11/2019
Number of Days to Update: 251
Source: Environmental Protection Agency
Telephone: N/A
Last EDR Contact: 11/20/2024
Next Scheduled EDR Contact: 03/10/2025
Data Release Frequency: Varies

PCB TRANSFORMER: PCB Transformer Registration Database
The database of PCB transformer registrations that includes all PCB registration submittals.

Date of Government Version: 09/13/2019
Date Data Arrived at EDR: 11/06/2019
Date Made Active in Reports: 02/10/2020
Number of Days to Update: 96
Source: Environmental Protection Agency
Telephone: 202-566-0517
Last EDR Contact: 10/31/2024
Next Scheduled EDR Contact: 02/10/2025
Data Release Frequency: Varies

RADINFO: Radiation Information Database
The Radiation Information Database (RADINFO) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity.

Date of Government Version: 07/01/2019
Date Data Arrived at EDR: 07/01/2019
Date Made Active in Reports: 09/23/2019
Number of Days to Update: 84

Source: Environmental Protection Agency
Telephone: 202-343-9775
Last EDR Contact: 09/18/2024
Next Scheduled EDR Contact: 01/06/2025
Data Release Frequency: Quarterly

HIST FTTS: FIFRA/TSCA Tracking System Administrative Case Listing

A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006
Date Data Arrived at EDR: 03/01/2007
Date Made Active in Reports: 04/10/2007
Number of Days to Update: 40

Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 12/17/2007
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: No Update Planned

HIST FTTS INSP: FIFRA/TSCA Tracking System Inspection & Enforcement Case Listing

A complete inspection and enforcement case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006
Date Data Arrived at EDR: 03/01/2007
Date Made Active in Reports: 04/10/2007
Number of Days to Update: 40

Source: Environmental Protection Agency
Telephone: 202-564-2501
Last EDR Contact: 12/17/2008
Next Scheduled EDR Contact: 03/17/2008
Data Release Frequency: No Update Planned

DOT OPS: Incident and Accident Data

Department of Transporation, Office of Pipeline Safety Incident and Accident data.

Date of Government Version: 01/02/2020
Date Data Arrived at EDR: 01/28/2020
Date Made Active in Reports: 04/17/2020
Number of Days to Update: 80

Source: Department of Transporation, Office of Pipeline Safety
Telephone: 202-366-4595
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 02/03/2025
Data Release Frequency: Quarterly

CONSENT: Superfund (CERCLA) Consent Decrees

Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 06/30/2024
Date Data Arrived at EDR: 07/08/2024
Date Made Active in Reports: 09/26/2024
Number of Days to Update: 80

Source: Department of Justice, Consent Decree Library
Telephone: Varies
Last EDR Contact: 09/25/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

BRS: Biennial Reporting System

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2021
Date Data Arrived at EDR: 03/09/2023
Date Made Active in Reports: 03/20/2023
Number of Days to Update: 11

Source: EPA/NTIS
Telephone: 800-424-9346
Last EDR Contact: 11/22/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Biennially

INDIAN RESERV: Indian Reservations

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 12/31/2014
Date Data Arrived at EDR: 07/14/2015
Date Made Active in Reports: 01/10/2017
Number of Days to Update: 546

Source: USGS
Telephone: 202-208-3710
Last EDR Contact: 10/01/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Semi-Annually

FUSRAP: Formerly Utilized Sites Remedial Action Program

DOE established the Formerly Utilized Sites Remedial Action Program (FUSRAP) in 1974 to remediate sites where radioactive contamination remained from Manhattan Project and early U.S. Atomic Energy Commission (AEC) operations.

Date of Government Version: 03/03/2023
Date Data Arrived at EDR: 03/03/2023
Date Made Active in Reports: 06/09/2023
Number of Days to Update: 98

Source: Department of Energy
Telephone: 202-586-3559
Last EDR Contact: 10/24/2024
Next Scheduled EDR Contact: 02/10/2025
Data Release Frequency: Varies

UMTRA: Uranium Mill Tailings Sites

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

Date of Government Version: 05/08/2024
Date Data Arrived at EDR: 08/14/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 14

Source: Department of Energy
Telephone: 505-845-0011
Last EDR Contact: 11/14/2024
Next Scheduled EDR Contact: 02/24/2025
Data Release Frequency: Varies

LEAD SMELTER 1: Lead Smelter Sites

A listing of former lead smelter site locations.

Date of Government Version: 09/25/2024
Date Data Arrived at EDR: 10/01/2024
Date Made Active in Reports: 10/23/2024
Number of Days to Update: 22

Source: Environmental Protection Agency
Telephone: 703-603-8787
Last EDR Contact: 12/03/2024
Next Scheduled EDR Contact: 01/06/2025
Data Release Frequency: Varies

LEAD SMELTER 2: Lead Smelter Sites

A list of several hundred sites in the U.S. where secondary lead smelting was done from 1931and 1964. These sites may pose a threat to public health through ingestion or inhalation of contaminated soil or dust

Date of Government Version: 04/05/2001
Date Data Arrived at EDR: 10/27/2010
Date Made Active in Reports: 12/02/2010
Number of Days to Update: 36

Source: American Journal of Public Health
Telephone: 703-305-6451
Last EDR Contact: 12/02/2009
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

US AIRS (AFS): Aerometric Information Retrieval System Facility Subsystem (AFS)

The database is a sub-system of Aerometric Information Retrieval System (AIRS). AFS contains compliance data on air pollution point sources regulated by the U.S. EPA and/or state and local air regulatory agencies. This information comes from source reports by various stationary sources of air pollution, such as electric power plants, steel mills, factories, and universities, and provides information about the air pollutants they produce. Action, air program, air program pollutant, and general level plant data. It is used to track emissions and compliance data from industrial plants.

Date of Government Version: 10/12/2016
Date Data Arrived at EDR: 10/26/2016
Date Made Active in Reports: 02/03/2017
Number of Days to Update: 100

Source: EPA
Telephone: 202-564-2496
Last EDR Contact: 09/26/2017
Next Scheduled EDR Contact: 01/08/2018
Data Release Frequency: Annually

US AIRS MINOR: Air Facility System Data

A listing of minor source facilities.

Date of Government Version: 10/12/2016
Date Data Arrived at EDR: 10/26/2016
Date Made Active in Reports: 02/03/2017
Number of Days to Update: 100

Source: EPA
Telephone: 202-564-2496
Last EDR Contact: 09/26/2017
Next Scheduled EDR Contact: 01/08/2018
Data Release Frequency: Annually

US MINES: Mines Master Index File

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Date of Government Version: 08/06/2024
Date Data Arrived at EDR: 08/14/2024
Date Made Active in Reports: 08/15/2024
Number of Days to Update: 1

Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959
Last EDR Contact: 11/18/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Semi-Annually

MINES VIOLATIONS: MSHA Violation Assessment Data

Mines violation and assessment information. Department of Labor, Mine Safety & Health Administration.

Date of Government Version: 10/01/2024
Date Data Arrived at EDR: 10/02/2024
Date Made Active in Reports: 10/09/2024
Number of Days to Update: 7

Source: DOL, Mine Safety & Health Admi
Telephone: 202-693-9424
Last EDR Contact: 11/13/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Quarterly

US MINES 2: Ferrous and Nonferrous Metal Mines Database Listing

This map layer includes ferrous (ferrous metal mines are facilities that extract ferrous metals, such as iron ore or molybdenum) and nonferrous (Nonferrous metal mines are facilities that extract nonferrous metals, such as gold, silver, copper, zinc, and lead) metal mines in the United States.

Date of Government Version: 05/02/2024
Date Data Arrived at EDR: 08/20/2024
Date Made Active in Reports: 10/09/2024
Number of Days to Update: 50

Source: USGS
Telephone: 703-648-7709
Last EDR Contact: 11/22/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Varies

US MINES 3: Active Mines & Mineral Plants Database Listing

Active Mines and Mineral Processing Plant operations for commodities monitored by the Minerals Information Team of the USGS.

Date of Government Version: 04/14/2011
Date Data Arrived at EDR: 06/08/2011
Date Made Active in Reports: 09/13/2011
Number of Days to Update: 97

Source: USGS
Telephone: 703-648-7709
Last EDR Contact: 11/22/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Varies

ABANDONED MINES: Abandoned Mines

An inventory of land and water impacted by past mining (primarily coal mining) is maintained by OSMRE to provide information needed to implement the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The inventory contains information on the location, type, and extent of AML impacts, as well as, information on the cost associated with the reclamation of those problems. The inventory is based upon field surveys by State, Tribal, and OSMRE program officials. It is dynamic to the extent that it is modified as new problems are identified and existing problems are reclaimed.

Date of Government Version: 09/10/2024
Date Data Arrived at EDR: 09/11/2024
Date Made Active in Reports: 11/19/2024
Number of Days to Update: 69

Source: Department of Interior
Telephone: 202-208-2609
Last EDR Contact: 11/26/2024
Next Scheduled EDR Contact: 03/17/2025
Data Release Frequency: Quarterly

MINES MRDS: Mineral Resources Data System
Mineral Resources Data System

Date of Government Version: 08/23/2022
Date Data Arrived at EDR: 11/22/2022
Date Made Active in Reports: 02/28/2023
Number of Days to Update: 98

Source: USGS
Telephone: 703-648-6533
Last EDR Contact: 11/22/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Varies

FINDS: Facility Index System/Facility Registry System
Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 08/13/2024
Date Data Arrived at EDR: 08/20/2024
Date Made Active in Reports: 08/28/2024
Number of Days to Update: 8

Source: EPA
Telephone: (415) 947-8000
Last EDR Contact: 11/20/2024
Next Scheduled EDR Contact: 03/10/2025
Data Release Frequency: Quarterly

DOCKET HWC: Hazardous Waste Compliance Docket Listing
A complete list of the Federal Agency Hazardous Waste Compliance Docket Facilities.

Date of Government Version: 05/06/2021
Date Data Arrived at EDR: 05/21/2021
Date Made Active in Reports: 08/11/2021
Number of Days to Update: 82

Source: Environmental Protection Agency
Telephone: 202-564-0527
Last EDR Contact: 11/13/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Varies

UXO: Unexploded Ordnance Sites
A listing of unexploded ordnance site locations

Date of Government Version: 09/06/2023
Date Data Arrived at EDR: 09/13/2023
Date Made Active in Reports: 12/11/2023
Number of Days to Update: 89

Source: Department of Defense
Telephone: 703-704-1564
Last EDR Contact: 10/03/2024
Next Scheduled EDR Contact: 01/20/2025
Data Release Frequency: Varies

ECHO: Enforcement & Compliance History Information
ECHO provides integrated compliance and enforcement information for about 800,000 regulated facilities nationwide.

Date of Government Version: 06/23/2024
Date Data Arrived at EDR: 06/28/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 14

Source: Environmental Protection Agency
Telephone: 202-564-2280
Last EDR Contact: 10/01/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Quarterly

FUELS PROGRAM: EPA Fuels Program Registered Listing
This listing includes facilities that are registered under the Part 80 (Code of Federal Regulations) EPA Fuels Programs. All companies now are required to submit new and updated registrations.

Date of Government Version: 08/13/2024
Date Data Arrived at EDR: 08/13/2024
Date Made Active in Reports: 10/09/2024
Number of Days to Update: 57

Source: EPA
Telephone: 800-385-6164
Last EDR Contact: 11/08/2024
Next Scheduled EDR Contact: 02/24/2025
Data Release Frequency: Quarterly

PFAS NPL: Superfund Sites with PFAS Detections Information

EPA's Office of Land and Emergency Management and EPA Regional Offices maintain data describing what is known about site investigations, contamination, and remedial actions under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) where PFAS is present in the environment.

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 703-603-8895
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

PFAS FEDERAL SITES: Federal Sites PFAS Information

Several federal entities, such as the federal Superfund program, Department of Defense, National Aeronautics and Space Administration, Department of Transportation, and Department of Energy provided information for sites with known or suspected detections at federal facilities.

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

PFAS TSCA: PFAS Manufacture and Imports Information

EPA issued the Chemical Data Reporting (CDR) Rule under the Toxic Substances Control Act (TSCA) and requires chemical manufacturers and facilities that manufacture or import chemical substances to report data to EPA. EPA publishes non-confidential business information (non-CBI) and includes descriptive information about each site, corporate parent, production volume, other manufacturing information, and processing and use information.

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

PFAS TRIS: List of PFAS Added to the TRI

Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added certain per- and polyfluoroalkyl substances (PFAS) to the list of chemicals covered by the Toxics Release Inventory (TRI) under Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) and provided a framework for additional PFAS to be added to TRI on an annual basis.

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 202-566-0250
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

PFAS RCRA MANIFEST: PFAS Transfers Identified In the RCRA Database Listing

To work around the lack of PFAS waste codes in the RCRA database, EPA developed the PFAS Transfers dataset by mining e-Manifest records containing at least one of these common PFAS keywords: PFAS, PFOA, PFOS, PERFL, AFFF, GENX, GEN-X (plus the VT waste codes). These keywords were searched for in the following text fields: Manifest handling instructions (MANIFEST_HANDLING_INSTR), Non-hazardous waste description (NON_HAZ_WASTE_DESCRIPTION), DOT printed information (DOT_PRINTED_INFORMATION), Waste line handling instructions (WASTE_LINE_HANDLING_INSTR), Waste residue comments (WASTE_RESIDUE_COMMENTS).

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

PFAS ATSDR: PFAS Contamination Site Location Listing

PFAS contamination site locations from the Department of Health & Human Services, Center for Disease Control & Prevention. ATSDR is involved at a number of PFAS-related sites, either directly or through assisting state and federal partners. As of now, most sites are related to drinking water contamination connected with PFAS production facilities or fire training areas where aqueous film-forming firefighting foam (AFFF) was regularly used.

Date of Government Version: 06/24/2020
Date Data Arrived at EDR: 03/17/2021
Date Made Active in Reports: 11/08/2022
Number of Days to Update: 601

Source: Department of Health & Human Services
Telephone: 202-741-5770
Last EDR Contact: 10/17/2024
Next Scheduled EDR Contact: 02/03/2025
Data Release Frequency: Varies

PFAS WQP: Ambient Environmental Sampling for PFAS

The Water Quality Portal (WQP) is a part of a modernized repository storing ambient sampling data for all environmental media and tissue samples. A wide range of federal, state, tribal and local governments, academic and non-governmental organizations and individuals submit project details and sampling results to this public repository. The information is commonly used for research and assessments of environmental quality.

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

PFAS PROJECT: NORTHEASTERN UNIVERSITY PFAS PROJECT

The PFAS Contamination Site Tracker records qualitative and quantitative data from each site in a chart, specifically examining discovery, contamination levels, government response, litigation, health impacts, media coverage, and community characteristics. All data presented in the chart were extracted from government websites, such as state health departments or the Environmental Protection Agency, and news articles.

Date of Government Version: 05/19/2023
Date Data Arrived at EDR: 04/05/2024
Date Made Active in Reports: 06/06/2024
Number of Days to Update: 62

Source: Social Science Environmental Health Research Institute
Telephone: N/A
Last EDR Contact: 09/05/2024
Next Scheduled EDR Contact: 12/16/2024
Data Release Frequency: Varies

PFAS NPDES: Clean Water Act Discharge Monitoring Information

Any discharger of pollutants to waters of the United States from a point source must have a National Pollutant Discharge Elimination System (NPDES) permit. The process for obtaining limits involves the regulated entity (permittee) disclosing releases in a NPDES permit application and the permitting authority (typically the state but sometimes EPA) deciding whether to require monitoring or monitoring with limits. Caveats and Limitations: Less than half of states have required PFAS monitoring for at least one of their permittees and fewer states have established PFAS effluent limits for permittees. New rulemakings have been initiated that may increase the number of facilities monitoring for PFAS in the future.

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

PFAS ECHO: Facilities in Industries that May Be Handling PFAS Listing

Regulators and the public have expressed interest in knowing which regulated entities may be using PFAS. EPA has developed a dataset from various sources that show which industries may be handling PFAS. Approximately 120,000 facilities subject to federal environmental programs have operated or currently operate in industry sectors with processes that may involve handling and/or release of PFAS.

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

PFAS ECHO FIRE TRAIN: Facilities in Industries that May Be Handling PFAS Listing

A list of fire training sites was added to the Industry Sectors dataset using a keyword search on the permitted facilitys name to identify sites where fire-fighting foam may have been used in training exercises. Additionally, you may view an example spreadsheet of the subset of fire training facility data, as well as the keywords used in selecting or deselecting a facility for the subset. as well as the keywords used in selecting or deselecting a facility for the subset. These keywords were tested to maximize accuracy in selecting facilities that may use fire-fighting foam in training exercises, however, due to the lack of a required reporting field in the data systems for designating fire training sites, this methodology may not identify all fire training sites or may potentially misidentify them.

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

PFAS PT 139 AIRPORT: All Certified Part 139 Airports PFAS Information Listing

Since July 1, 2006, all certified part 139 airports are required to have fire-fighting foam onsite that meet military specifications (MIL-F-24385) (14 CFR 139.317). To date, these military specification fire-fighting foams are fluorinated and have been historically used for training and extinguishing. The 2018 FAA Reauthorization Act has a provision stating that no later than October 2021, FAA shall not require the use of fluorinated AFFF. This provision does not prohibit the use of fluorinated AFFF at Part 139 civilian airports; it only prohibits FAA from mandating its use. The Federal Aviation Administration?s document AC 150/5210-6D - Aircraft Fire Extinguishing Agents provides guidance on Aircraft Fire Extinguishing Agents, which includes Aqueous Film Forming Foam (AFFF).

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 202-272-0167
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

AQUEOUS FOAM NRC: Aqueous Foam Related Incidents Listing

The National Response Center (NRC) serves as an emergency call center that fields initial reports for pollution and railroad incidents and forwards that information to appropriate federal/state agencies for response. The spreadsheets posted to the NRC website contain initial incident data that has not been validated or investigated by a federal/state response agency. Response center calls from 1990 to the most recent complete calendar year where there was indication of Aqueous Film Forming Foam (AFFF) usage are included in this dataset. NRC calls may reference AFFF usage in the ?Material Involved? or ?Incident Description? fields.

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/01/2024
Date Made Active in Reports: 07/12/2024
Number of Days to Update: 11

Source: Environmental Protection Agency
Telephone: 202-267-2675
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

PCS: Permit Compliance System

PCS is a computerized management information system that contains data on National Pollutant Discharge Elimination System (NPDES) permit holding facilities. PCS tracks the permit, compliance, and enforcement status of NPDES facilities.

Date of Government Version: 12/16/2016
Date Data Arrived at EDR: 01/06/2017
Date Made Active in Reports: 03/10/2017
Number of Days to Update: 63

Source: EPA, Office of Water
Telephone: 202-564-2496
Last EDR Contact: 09/25/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: No Update Planned

PCS ENF: Enforcement data
No description is available for this data

Date of Government Version: 12/31/2014
Date Data Arrived at EDR: 02/05/2015
Date Made Active in Reports: 03/06/2015
Number of Days to Update: 29

Source: EPA
Telephone: 202-564-2497
Last EDR Contact: 09/25/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

BIOSOLIDS: ICIS-NPDES Biosolids Facility Data
The data reflects compliance information about facilities in the biosolids program.

Date of Government Version: 10/13/2024
Date Data Arrived at EDR: 10/16/2024
Date Made Active in Reports: 10/23/2024
Number of Days to Update: 7

Source: Environmental Protection Agency
Telephone: 202-564-4700
Last EDR Contact: 10/16/2024
Next Scheduled EDR Contact: 01/27/2025
Data Release Frequency: Varies

UST FINDER: UST Finder Database
EPA developed UST Finder, a web map application containing a comprehensive, state-sourced national map of underground storage tank (UST) and leaking UST (LUST) data. It provides the attributes and locations of active and closed USTs, UST facilities, and LUST sites from states and from Tribal lands and US territories . UST Finder contains information about proximity of UST facilities and LUST sites to: surface and groundwater public drinking water protection areas; estimated number of private domestic wells and number of people living nearby; and flooding and wildfires.

Date of Government Version: 06/08/2023
Date Data Arrived at EDR: 10/04/2023
Date Made Active in Reports: 01/18/2024
Number of Days to Update: 106

Source: Environmental Protection Agency
Telephone: 202-564-0394
Last EDR Contact: 11/06/2024
Next Scheduled EDR Contact: 02/17/2025
Data Release Frequency: Varies

UST FINDER RELEASE: UST Finder Releases Database
US EPA’s UST Finder data is a national composite of leaking underground storage tanks. This data contains information about, and locations of, leaking underground storage tanks. Data was collected from state sources and standardized into a national profile by EPA’s Office of Underground Storage Tanks, Office of Research and Development, and the Association of State and Territorial Solid Waste Management Officials.

Date of Government Version: 06/08/2023
Date Data Arrived at EDR: 10/31/2023
Date Made Active in Reports: 01/18/2024
Number of Days to Update: 79

Source: Environmental Protecton Agency
Telephone: 202-564-0394
Last EDR Contact: 11/06/2024
Next Scheduled EDR Contact: 02/17/2025
Data Release Frequency: Semi-Annually

E MANIFEST: Hazardous Waste Electronic Manifest System
EPA established a national system for tracking hazardous waste shipments electronically. This system, known as ?e-Manifest,? will modernize the nation?s cradle-to-grave hazardous waste tracking process while saving valuable time, resources, and dollars for industry and states.

Date of Government Version: 07/24/2023
Date Data Arrived at EDR: 04/18/2024
Date Made Active in Reports: 06/06/2024
Number of Days to Update: 49

Source: Environmental Protection Agency
Telephone: 833-501-6826
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Varies

AIRS: Permitted Airs Facility Listing
A listing of permitted Airs facilities and their associated emissions information.

Date of Government Version: 06/10/2024
Date Data Arrived at EDR: 06/12/2024
Date Made Active in Reports: 09/05/2024
Number of Days to Update: 85

Source: Division of Environmental Protection
Telephone: 775-687-9359
Last EDR Contact: 09/06/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Semi-Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

COAL ASH: Coal Ash Disposal Sites
A listing of coal ash plants.

Date of Government Version: 02/15/2023
Date Data Arrived at EDR: 02/16/2023
Date Made Active in Reports: 05/11/2023
Number of Days to Update: 84

Source: Division of Environmental Protection
Telephone: 775-687-9477
Last EDR Contact: 11/13/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Varies

FIN ASSURANCE 1: Financial Assurance Information Listing
Financial assurance is intended to ensure that resources are available to pay for the cost of closure, post-closure care, and corrective measures if the owner or operator of a regulated facility is unable or unwilling to pay.

Date of Government Version: 06/01/2017
Date Data Arrived at EDR: 06/19/2017
Date Made Active in Reports: 09/28/2017
Number of Days to Update: 101

Source: Department of Environmental Protection
Telephone: 775-687-9465
Last EDR Contact: 09/06/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Varies

FIN ASSURANCE 2: Financial Assurance Information
Solid waste facility financial assurance information.

Date of Government Version: 08/19/2024
Date Data Arrived at EDR: 08/19/2024
Date Made Active in Reports: 11/04/2024
Number of Days to Update: 77

Source: Division of Environmental Protection
Telephone: 775-687-9477
Last EDR Contact: 11/18/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: Quarterly

FIN ASSURANCE 3: Financial Assurance Information Listing
Information for underground storage tanks. The certificate may be used to demonstrate financial responsibility in accordance with NAC 459.995. The Nevada Petroleum Fund is approved by the U.S. E.P.A. as a State Fund (40 CFR 280.101) program. The Fund is required to carry forward a minimum balance of $7,500,000 for each fiscal year, and assures up to $1,000,000 per tank system for clean up costs and $1,000,000 per tank system for damages to third parties due to an accidental release, less any applicable co-payment. Failure to meet Federal and State release reporting requirements may result in reduction or denial of Petroleum Fund coverage.

Date of Government Version: 07/01/2024
Date Data Arrived at EDR: 07/02/2024
Date Made Active in Reports: 09/26/2024
Number of Days to Update: 86

Source: Department of Conservation & Natural Resources
Telephone: 775-687-9488
Last EDR Contact: 10/02/2024
Next Scheduled EDR Contact: 01/13/2025
Data Release Frequency: Varies

HMRI: Hazardous Materials Repository Information Data
Emergency Planning and Community Right-to-Know Act (EPCRA) required facilities which store or manufacture hazardous materials to prepare and submit a chemical inventory report by March 1st of each year to the State Emergency Response Commission (SERC), LEPC and the local fire department. The inventory form must include information on all hazardous chemicals present at the facility during the previous calendar year in amounts that meet or exceed thresholds.

Date of Government Version: 12/31/2023
Date Data Arrived at EDR: 05/08/2024
Date Made Active in Reports: 08/06/2024
Number of Days to Update: 90

Source: State Emergency Response Commission
Telephone: 775-687-6973
Last EDR Contact: 10/31/2024
Next Scheduled EDR Contact: 02/17/2025
Data Release Frequency: Semi-Annually

NPDES: Permitted Facility Listing
A listing of permitted wastewater facilities.

Date of Government Version: 09/16/2024
Date Data Arrived at EDR: 09/17/2024
Date Made Active in Reports: 12/03/2024
Number of Days to Update: 77

Source: Department of Environmental Protection
Telephone: 775-687-9414
Last EDR Contact: 09/06/2024
Next Scheduled EDR Contact: 12/23/2024
Data Release Frequency: Varies

PFAS: NDEP PFAS Sampling and Analysis

The Nevada Board of Examiners approved an NDEP contract for PFAS sampling and analysis from drinking water, wastewater, and surface water body sites. This information includes a summary of these analyses.

Date of Government Version: 09/04/2024
Date Data Arrived at EDR: 09/17/2024
Date Made Active in Reports: 12/04/2024
Number of Days to Update: 78

Source: Department of Conservation & Natural Resources
Telephone: 775-687-9581
Last EDR Contact: 09/17/2024
Next Scheduled EDR Contact: 12/30/2024
Data Release Frequency: Varies

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP: EDR Proprietary Manufactured Gas Plants

The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

EDR Hist Auto: EDR Exclusive Historical Auto Stations

EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

EDR Hist Cleaner: EDR Exclusive Historical Cleaners

EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA
IN THE MATTER OF:

Application of NVSolarWRX, LLC, for a permit to construct a 450 MW Solar Energy Generating Facility, 345 kV Project Substation, 345 kV Generation-Tie Line, and associated facilities, including an energy storage system to be located in Washoe County, Nevada, pursuant to the Utility Environmental Protection Act	Docket No. 25-_____

VOLUME 2 OF 2

NVSOLARWRX, LLC

VOLUME 2 OF 2	Page No.
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HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA HWS: Recovered Government Archive State Hazardous Waste Facilities List

The EDR Recovered Government Archive State Hazardous Waste database provides a list of SHWS incidents derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the Department of Conservation and Natural Resources in Neveda.

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 12/26/2013
Number of Days to Update: 178

Source: Department of Conservation and Natural Resources
Telephone: N/A
Last EDR Contact: 06/01/2012
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

RGA LF: Recovered Government Archive Solid Waste Facilities List

The EDR Recovered Government Archive Landfill database provides a list of landfills derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the Department of Conservation and Natural Resources in Neveda.

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 01/16/2014
Number of Days to Update: 199

Source: Department of Conservation and Natural Resources
Telephone: N/A
Last EDR Contact: 06/01/2012
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

RGA LUST: Recovered Government Archive Leaking Underground Storage Tank

The EDR Recovered Government Archive Leaking Underground Storage Tank database provides a list of LUST incidents derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the Department of Conservation and Natural Resources in Neveda.

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 12/26/2013
Number of Days to Update: 178

Source: Department of Conservation and Natural Resources
Telephone: N/A
Last EDR Contact: 06/01/2012
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

COUNTY RECORDS

WASHOE COUNTY:

UST - WASHOE: Underground Storage Tank in Washoe County

A listing of underground storage tank sites located in Washoe County.

Date of Government Version: 08/03/2020
Date Data Arrived at EDR: 08/05/2020
Date Made Active in Reports: 08/11/2020
Number of Days to Update: 6

Source: Washoe County Department of Environmental Health
Telephone: 775-328-2493
Last EDR Contact: 11/13/2024
Next Scheduled EDR Contact: 03/03/2025
Data Release Frequency: No Update Planned

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

CT MANIFEST: Hazardous Waste Manifest Data

Facility and manifest data. Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a tsd facility.

Date of Government Version: 08/05/2024
Date Data Arrived at EDR: 08/06/2024
Date Made Active in Reports: 10/25/2024
Number of Days to Update: 80

Source: Department of Energy & Environmental Protection
Telephone: 860-424-3375
Last EDR Contact: 11/05/2024
Next Scheduled EDR Contact: 02/17/2025
Data Release Frequency: No Update Planned

NY MANIFEST: Facility and Manifest Data

Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

Date of Government Version: 12/31/2019
Date Data Arrived at EDR: 11/30/2023
Date Made Active in Reports: 12/01/2023
Number of Days to Update: 1

Source: Department of Environmental Conservation
Telephone: 518-402-8651
Last EDR Contact: 10/24/2024
Next Scheduled EDR Contact: 02/03/2025
Data Release Frequency: Quarterly

Oil/Gas Pipelines

Source: Endeavor Business Media

Petroleum Bundle (Crude Oil, Refined Products, Petrochemicals, Gas Liquids (LPG/NGL), and Specialty Gases (Miscellaneous)) N = Natural Gas Bundle (Natural Gas, Gas Liquids (LPG/NGL), and Specialty Gases (Miscellaneous)). This map includes information copyrighted by Endeavor Business Media. This information is provided on a best effort basis and Endeavor Business Media does not guarantee its accuracy nor warrant its fitness for any particular purpose. Such information has been reprinted with the permission of Endeavor Business Media.

Electric Power Transmission Line Data

Source: Endeavor Business Media

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Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:

Source: American Hospital Association, Inc.
Telephone: 312-280-5991
The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing

Source: Centers for Medicare & Medicaid Services
Telephone: 410-786-3000
A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes

Source: National Institutes of Health
Telephone: 301-594-6248
Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools

Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

Private Schools

Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on private school locations in the United States.

Daycare Centers: Child Care Facility List

Source: Department of Human Resources
Telephone: 775-684-1100

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Flood Zone Data: This data was obtained from the Federal Emergency Management Agency (FEMA). It depicts 100-year and 500-year flood zones as defined by FEMA. It includes the National Flood Hazard Layer (NFHL) which incorporates Flood Insurance Rate Map (FIRM) data and Q3 data from FEMA in areas not covered by NFHL.
Source: FEMA
Telephone: 877-336-2627
Date of Government Version: 2003, 2015

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005, 2010 and 2015 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetland Inventory
Source: Natural Heritage Program
Telephone: 775-684-2900

Current USGS 7.5 Minute Topographic Map
Source: U.S. Geological Survey

STREET AND ADDRESS INFORMATION

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GEOCHECK®- PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

ROBERT SIMMONS SOLAR
FISH SPRINGS ROAD
EMPIRE, NV 89405

TARGET PROPERTY COORDINATES

Latitude (North):	40.138474 - 40° 8' 18.51"
Longitude (West):	119.929064 - 119° 55' 44.63"
Universal Tranverse Mercator:	Zone 11
UTM X (Meters):	250456.6
UTM Y (Meters):	4447030.0
Elevation:	3988 ft. above sea level

USGS TOPOGRAPHIC MAP

Target Property Map:	50001630 FLANIGAN, NV
Version Date:	2021
South Map:	50002496 STATE LINE PEAK, NV
Version Date:	2021

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principle investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

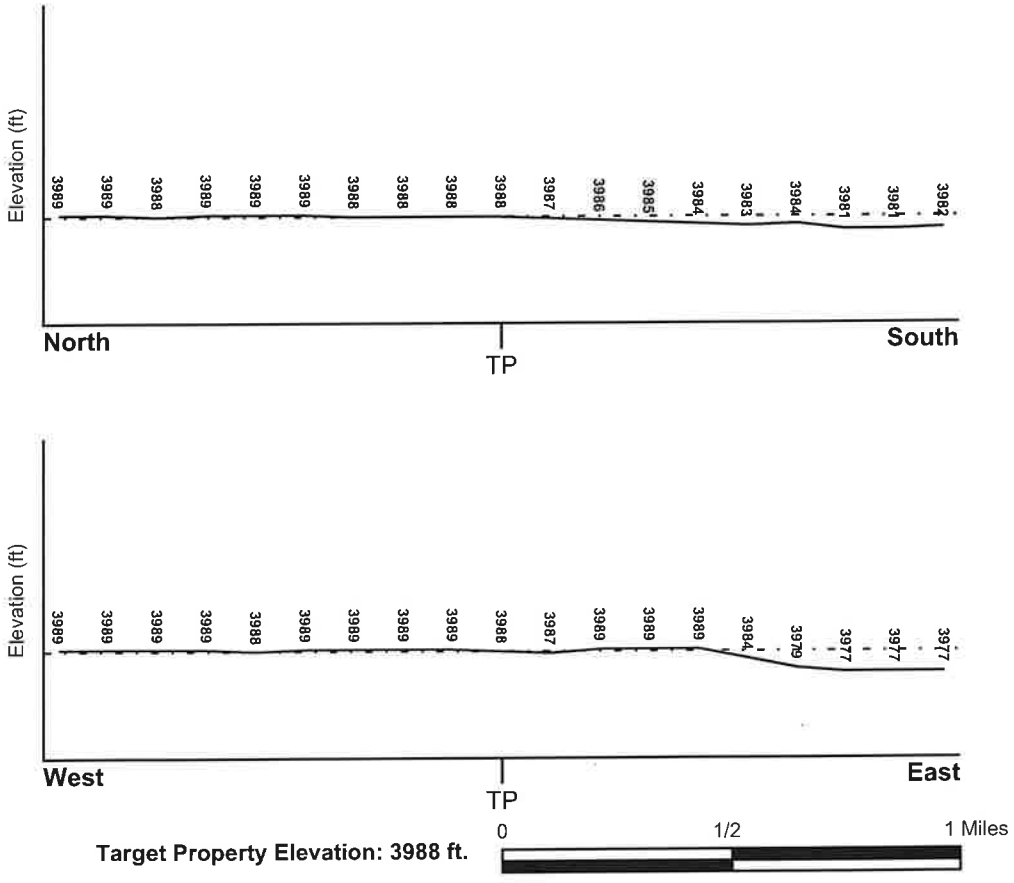
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General South

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

Flood Plain Panel at Target Property	FEMA Source Type
32031C2125E	FEMA Q3 Flood data

Additional Panels in search area:	FEMA Source Type
06035C2675D	FEMA FIRM Flood data
32031C2275G	FEMA FIRM Flood data

NATIONAL WETLAND INVENTORY

NWI Quad at Target Property	NWI Electronic Data Coverage
FLANIGAN	YES - refer to the Overview Map and Detail Map

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Site-Specific Hydrogeological Data*:

Search Radius:	1.25 miles
Status:	Not found

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

MAP ID	LOCATION FROM TP	GENERAL DIRECTION GROUNDWATER FLOW
Not Reported		

* ©1996 Site-specific hydrogeological data gathered by CERCLIS Alerts, Inc., Bainbridge Island, WA. All rights reserved. All of the information and opinions presented are those of the cited EPA report(s), which were completed under a Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) investigation.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

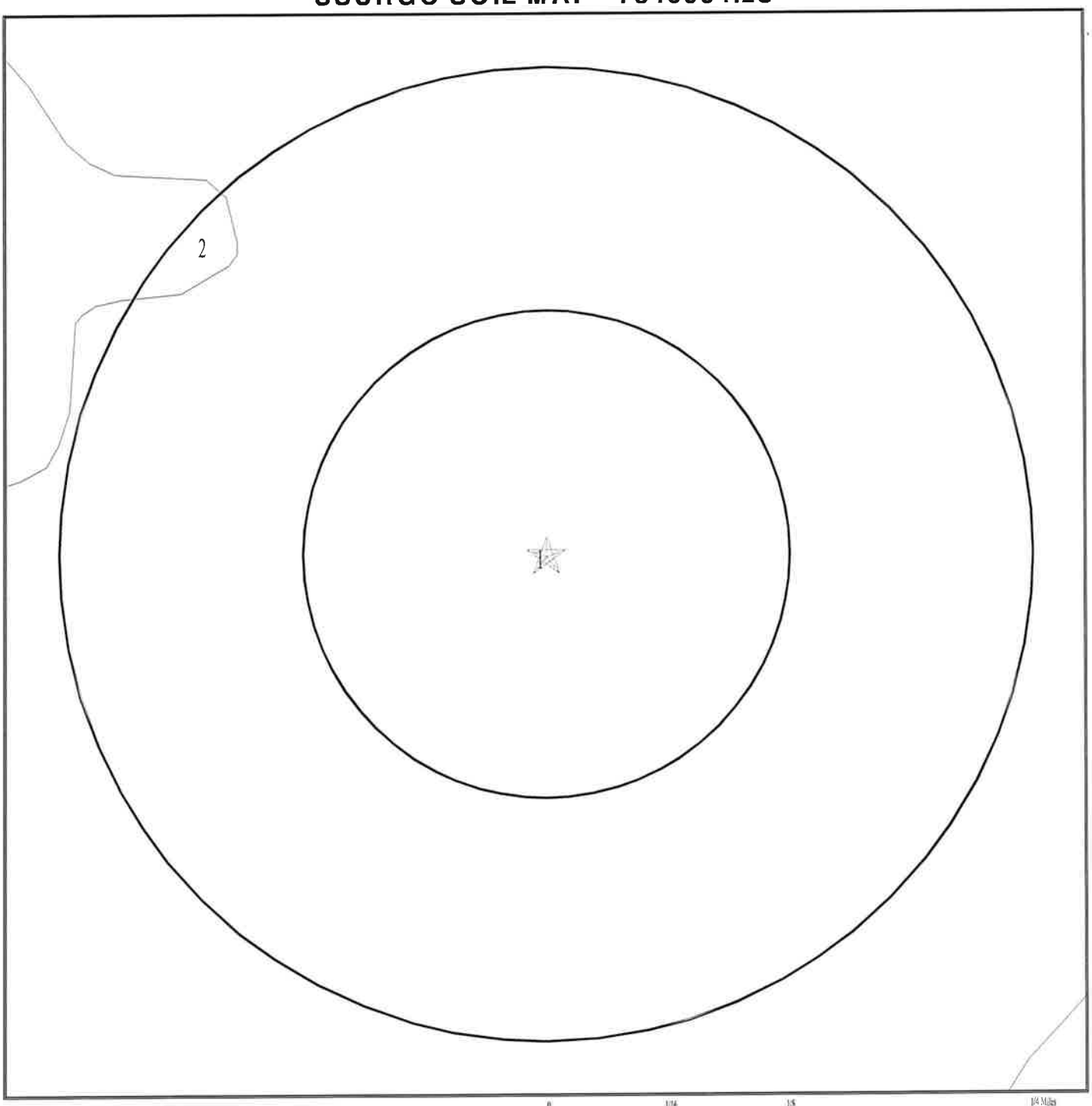
Era:	Cenozoic
System:	Quaternary
Series:	Quaternary
Code:	Q *(decoded above as Era, System & Series)*

GEOLOGIC AGE IDENTIFICATION

Category: Stratifed Sequence

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

SSURGO SOIL MAP - 7840954.2s



☆ Target Property

SSURGO Soil

Water

SITE NAME:	Robert Simmons Solar	CLIENT:	McGinley Associates
ADDRESS:	Fish Springs Road Empire NV 89405	CONTACT:	Anna Henry, E.I., C.E.M. #2497, Exp. Date 09/23/20
LAT/LONG:	40.138474 / 119.929064	INQUIRY #:	7840954.2s
		DATE:	December 05, 2024 4:45 pm

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GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. The following information is based on Soil Conservation Service SSURGO data.

Soil Map ID: 1

Soil Component Name: Gitakup

Soil Surface Texture: silty clay loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Moderately well drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
1	0 inches	1 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 1.4 Min: 0.42	Max: 9 Min: 8.5
2	1 inches	11 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 1.4 Min: 0.42	Max: 9 Min: 8.5
3	11 inches	29 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 1.4 Min: 0.42	Max: 9 Min: 8.5
4	29 inches	59 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 1.4 Min: 0.42	Max: 9 Min: 8.5

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Map ID: 2

Soil Component Name: Chuckles

Soil Surface Texture: loam

Hydrologic Group: Class B - Moderate infiltration rates. Deep and moderately deep, moderately well and well drained soils with moderately coarse textures.

Soil Drainage Class: Moderately well drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
1	0 inches	5 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 4 Min: 1.4	Max: 9 Min: 8.5
2	5 inches	14 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 4 Min: 1.4	Max: 9 Min: 8.5
3	14 inches	33 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 4 Min: 1.4	Max: 9 Min: 8.5
4	33 inches	59 inches	stratified very fine sandy loam to silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 4 Min: 1.4	Max: 9 Min: 8.5

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

DATABASE	SEARCH DISTANCE (miles)
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
2	USGS40000766917	1/4 - 1/2 Mile NNE
4	USGS40000766910	1/2 - 1 Mile SW
5	USGS40000766927	1/2 - 1 Mile NNW

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

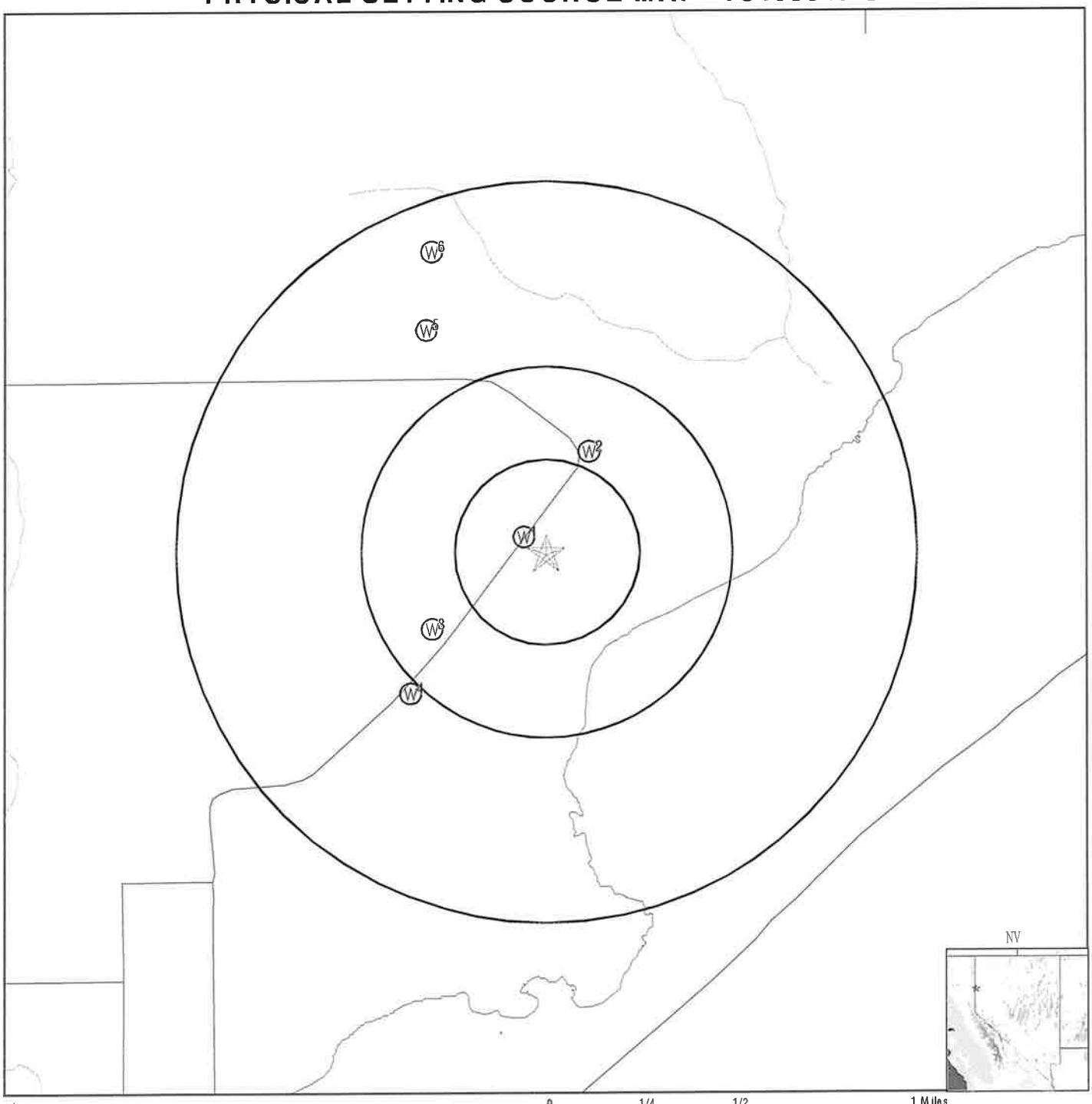
MAP ID	WELL ID	LOCATION FROM TP
No PWS System Found		

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
1	NV8000000018923	0 - 1/8 Mile NW
3	NV8000000018922	1/4 - 1/2 Mile SW
6	NV8000000018924	1/2 - 1 Mile NNW

PHYSICAL SETTING SOURCE MAP - 7840954.2s



- County Boundary
- Major Roads
- Contour Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons
- Groundwater Flow Direction
- GI Indeterminate Groundwater Flow at Location
- GV Groundwater Flow Varies at Location
- HD Closest Hydrogeological Data
- Oil, gas or related wells

SITE NAME: Robert Simmons Solar	CLIENT: McGinley Associates
ADDRESS: Fish Springs Road	CONTACT: Anna Henry, E.I., C.E.M. #2497, Exp. Date 09/23/20
Empire NV 89405	INQUIRY #: 7840954.2s
LAT/LONG: 40.138474 / 119.929064	DATE: December 05, 2024 4:45 pm

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GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
1 **NW** **0 - 1/8 Mile** **Higher**	**NV WELLS**	**NV8000000018923**

WELLS:

Log #:	20384	Application #:	38546
Notice of Intent:	0	Waiver #:	Not Reported
Site Type:	New	Work Type:	New
Work Remarks:	Not Reported		
Proposed Use:	Irrigation	Drill Method:	Hydraulic Rotary-Mud
Current Owner:	LOPEZ, GARY LEE	Parcel #:	Not Reported
Subdivision Name:	Not Reported	Completion Date:	23-JUL-79
Gravel Packed:	Y	Seal Depth (ft):	Not Reported
Depth Drilled (ft):	200	Depth to Bedrock (ft):	Not Reported
Aquifer:	Not Reported	Casing Depth (ft):	200
Casing Diameter (in):	12.25	Casing Reduction:	0
Perforation From (ft):	1	Perforation to (ft):	200
Perforation Interval:	1	Static Water Level (ft):	20
Temperature:	50	Yield:	30
Drawdown:	0	Hours Pumped:	4
Test Method:	Bucket	Quality of Construction Data:	Good
Quality of Lithologic data:	Good	Drilling Contractor:	Not Reported
Driller License #:	954	Source Agency:	NV003
Well Drilling Begun:	20-JUL-79	Gravel Pack Top (ft):	Not Reported
Gravel Pack Bottom (ft):	Not Reported		
Remarks:	Not Reported		
Addtl Remarks:	Not Reported		
Image URL:	images.water.nv.gov/images/well_logs/20000/20384.pdf		

	Database	EDR ID Number
2 **NNE** **1/4 - 1/2 Mile** **Higher**	**FED USGS**	**USGS40000766917**

Organization ID:	USGS-NV	Organization Name:	USGS Nevada Water Science Center
Monitor Location:	097 N26 E18 11ABAD1	Type:	Well
Description:	Not Reported	HUC:	18080003
Drainage Area:	Not Reported	Drainage Area Units:	Not Reported
Contrib Drainage Area:	Not Reported	Contrib Drainage Area Unts:	Not Reported
Aquifer:	Not Reported	Formation Type:	Not Reported
Aquifer Type:	Not Reported	Construction Date:	19790720
Well Depth:	64	Well Depth Units:	ft
Well Hole Depth:	200	Well Hole Depth Units:	ft

Ground water levels,Number of Measurements:	12	Level reading date:	1988-05-12
Feet below surface:	25.26	Feet to sea level:	Not Reported
Note:	Not Reported		
Level reading date:	1988-04-12	Feet below surface:	25.9
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1988-03-01	Feet below surface:	25.4
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1988-01-28	Feet below surface:	25.5
Feet to sea level:	Not Reported	Note:	Not Reported

Level reading date:	1987-12-30	Feet below surface:	25.5
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-11-19	Feet below surface:	25.6
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-10-02	Feet below surface:	25.7
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-09-03	Feet below surface:	25.7
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-07-15	Feet below surface:	25.4
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-06-17	Feet below surface:	25.3
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-04-22	Feet below surface:	25.2
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1979-07-23	Feet below surface:	20
Feet to sea level:	Not Reported	Note:	Not Reported

3
SW
1/4 - 1/2 Mile
Higher

NV WELLS **NV8000000018922**

WELLS:

Log #:	20383	Application #:	38547
Notice of Intent:	0	Waiver #:	Not Reported
Site Type:	New	Work Type:	New
Work Remarks:	Not Reported		
Proposed Use:	Irrigation	Drill Method:	Hydraulic Rotary-Mud
Current Owner:	TOPE, GARY LEE	Parcel #:	Not Reported
Subdivision Name:	Not Reported	Completion Date:	20-JUL-79
Gravel Packed:	Y	Seal Depth (ft):	Not Reported
Depth Drilled (ft):	298	Depth to Bedrock (ft):	Not Reported
Aquifer:	Not Reported	Casing Depth (ft):	298
Casing Diameter (in):	12.25	Casing Reduction:	0
Perforation From (ft):	40	Perforation to (ft):	298
Perforation Interval:	1	Static Water Level (ft):	30
Temperature:	50	Yield:	30
Drawdown:	0	Hours Pumped:	4
Test Method:	Bucket	Quality of Construction Data:	Good
Quality of Lithologic data:	Good	Drilling Contractor:	Not Reported
Driller License #:	954	Source Agency:	NV003
Well Drilling Begun:	17-JUL-79	Gravel Pack Top (ft):	1
Gravel Pack Bottom (ft):	298		
Remarks:	Not Reported		
Addtl Remarks:	Not Reported		
Image URL:	images.water.nv.gov/images/well_logs/20000/20383.pdf		

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
4 SW 1/2 - 1 Mile Higher	**FED USGS**	**USGS40000766910**

Organization ID:	USGS-NV	Organization Name:	USGS Nevada Water Science Center
Monitor Location:	097 N26 E18 11CACC1	Type:	Well
Description:	Not Reported	HUC:	18080003
Drainage Area:	Not Reported	Drainage Area Units:	Not Reported
Contrib Drainage Area:	Not Reported	Contrib Drainage Area Unts:	Not Reported
Aquifer:	Not Reported	Formation Type:	Not Reported
Aquifer Type:	Not Reported	Construction Date:	19790717
Well Depth:	167	Well Depth Units:	ft
Well Hole Depth:	298	Well Hole Depth Units:	ft

Ground water levels,Number of Measurements:	12		
Feet below surface:	26.10	Level reading date:	1988-05-12
Note:	Not Reported	Feet to sea level:	Not Reported
Level reading date:	1988-04-12	Feet below surface:	26.1
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1988-03-01	Feet below surface:	26.1
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1988-01-28	Feet below surface:	26.2
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-12-30	Feet below surface:	26.3
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-11-19	Feet below surface:	26.4
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-10-02	Feet below surface:	26.4
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-09-03	Feet below surface:	26.4
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-07-15	Feet below surface:	26.2
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-06-17	Feet below surface:	26.1
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-04-22	Feet below surface:	26.1
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1979-07-20	Feet below surface:	30
Feet to sea level:	Not Reported	Note:	Not Reported

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
5 NNW 1/2 - 1 Mile Higher	**FED USGS**	**USGS40000766927**

Organization ID:	USGS-NV	Organization Name:	USGS Nevada Water Science Center
Monitor Location:	097 N26 E18 02CDBA1	Type:	Well
Description:	Not Reported	HUC:	18080003
Drainage Area:	Not Reported	Drainage Area Units:	Not Reported
Contrib Drainage Area:	Not Reported	Contrib Drainage Area Unts:	Not Reported
Aquifer:	Not Reported	Formation Type:	Not Reported
Aquifer Type:	Not Reported	Construction Date:	19790723
Well Depth:	99	Well Depth Units:	ft
Well Hole Depth:	235	Well Hole Depth Units:	ft

Ground water levels,Number of Measurements:	12	Level reading date:	1988-05-12
Feet below surface:	29.78	Feet to sea level:	Not Reported
Note:	Not Reported		
Level reading date:	1988-04-12	Feet below surface:	30.1
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1988-03-01	Feet below surface:	30.0
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1988-01-28	Feet below surface:	30.0
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-12-30	Feet below surface:	30.0
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-11-19	Feet below surface:	30.1
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-10-02	Feet below surface:	30.3
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-09-03	Feet below surface:	30.3
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-07-15	Feet below surface:	30.0
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-06-17	Feet below surface:	29.9
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1987-04-22	Feet below surface:	29.8
Feet to sea level:	Not Reported	Note:	Not Reported
Level reading date:	1979-07-26	Feet below surface:	20
Feet to sea level:	Not Reported	Note:	Not Reported

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
6 **NNW** **1/2 - 1 Mile** **Higher**	**NV WELLS**	**NV8000000018924**

WELLS:

Log #:	20385	Application #:	38544
Notice of Intent:	0	Waiver #:	Not Reported
Site Type:	New	Work Type:	New
Work Remarks:	Not Reported		
Proposed Use:	Irrigation	Drill Method:	Unknown
Current Owner:	TOPE, GARY LEE	Parcel #:	Not Reported
Subdivision Name:	Not Reported	Completion Date:	26-JUL-79
Gravel Packed:	Y	Seal Depth (ft):	Not Reported
Depth Drilled (ft):	235	Depth to Bedrock (ft):	Not Reported
Aquifer:	Not Reported	Casing Depth (ft):	235
Casing Diameter (in):	12.25	Casing Reduction:	0
Perforation From (ft):	1	Perforation to (ft):	235
Perforation Interval:	1	Static Water Level (ft):	20
Temperature:	50	Yield:	30
Drawdown:	0	Hours Pumped:	4
Test Method:	Bucket	Quality of Construction Data:	Good
Quality of Lithologic data:	Good	Drilling Contractor:	Not Reported
Driller License #:	954	Source Agency:	NV003
Well Drilling Begun:	23-JUL-79	Gravel Pack Top (ft):	Not Reported
Gravel Pack Bottom (ft):	Not Reported		
Remarks:	Not Reported		
Addtl Remarks:	Not Reported		
Image URL:	images.water.nv.gov/images/well_logs/20000/20385.pdf		

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS
RADON

AREA RADON INFORMATION

State Database: NV Radon

Radon Test Results

# Tests	# < 4 pci/L	# > 4 pCi/L	% > 4 pCi/L	Average	Max
2	2	0	0	1.3	1.3

Federal EPA Radon Zone for WASHOE County: 2

Note: Zone 1 indoor average level > 4 pCi/L.
: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
: Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for WASHOE COUNTY, NV

Number of sites tested: 132

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	1.454 pCi/L	94%	6%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	7.815 pCi/L	41%	48%	11%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)
Source: United States Geologic Survey
EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2006. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

Current USGS 7.5 Minute Topographic Map
Source: U.S. Geological Survey

HYDROLOGIC INFORMATION

Flood Zone Data: This data was obtained from the Federal Emergency Management Agency (FEMA). It depicts 100-year and 500-year flood zones as defined by FEMA. It includes the National Flood Hazard Layer (NFHL) which incorporates Flood Insurance Rate Map (FIRM) data and Q3 data from FEMA in areas not covered by NFHL.
Source: FEMA
Telephone: 877-336-2627
Date of Government Version: 2003, 2015

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005, 2010 and 2015 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetland Inventory
Source: Natural Heritage Program
Telephone: 775-684-2900

HYDROGEOLOGIC INFORMATION

AQUIFLOW^{R} Information System
Source: EDR proprietary database of groundwater flow information
EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit
Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database
Source: Department of Agriculture, Natural Resources Conservation Service (NRCS)
The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

SSURGO: Soil Survey Geographic Database
Source: Department of Agriculture, Natural Resources Conservation Service (NRCS)
Telephone: 800-672-5559
SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Service, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

LOCAL / REGIONAL WATER AGENCY RECORDS

FEDERAL WATER WELLS

PWS: Public Water Systems
Source: EPA/Office of Drinking Water
Telephone: 202-564-3750
Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data
Source: EPA/Office of Drinking Water
Telephone: 202-564-3750
Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: USGS National Water Inventory System (NWIS)
This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

STATE RECORDS

Nevada Well Log Database
Source: Dept of Conservation and Natural Resources, Division of Water Resources
Telephone: 775-687-4380

OTHER STATE DATABASE INFORMATION

Oil and Gas Well Database
Source: Nevada Bureau of Mines and Geology
Telephone: 775-784-6691
Oil and gas well locationS in the state of Nevada.

RADON

State Database: NV Radon
Source: State Health Division
Telephone: 775-687-7531
Radon Test Results By Zip Code

Area Radon Information
Source: USGS
Telephone: 703-356-4020
The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones
Source: EPA
Telephone: 703-356-4020
Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities
Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater
Source: Department of Commerce, National Oceanic and Atmospheric Administration

Earthquake Fault Lines: The fault lines displayed on EDR's Topographic map are digitized quaternary faultlines, prepared in 1975 by the United State Geological Survey

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STREET AND ADDRESS INFORMATION

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VAPOR ENCROACHMENT SCREEN

UES™

Grounded in Excellence

Robert Simmons Solar
Fish Springs Road
Empire, NV 89405

Inquiry Number: 7840954.2s
December 16, 2024

EDR Vapor Encroachment Screen

Prepared using EDR's Vapor Encroachment Worksheet

EDR® Environmental Data Resources Inc

6 Armstrong Road, 4th floor
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Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by EDR. The report was designed to assist parties seeking to meet the search requirements of the ASTM Standard Practice for Assessment of Vapor Encroachment into Structures on Property Involved in Real Estate Transactions (E 2600).

STANDARD ENVIRONMENTAL RECORDS	Default Area of Concern (Miles)*	property	1/10	> 1/10
Lists of Federal NPL (Superfund) sites	2.0	0	0	0
Lists of Federal Delisted NPL sites	2.0	0	0	0
Lists of Federal sites subject to CERCLA removals and CERCLA orders	1.5	0	0	0
Lists of Federal CERCLA sites with NFRAP	1.5	0	0	0
Lists of Federal RCRA facilities undergoing Corrective Action	2.0	0	0	0
Lists of Federal RCRA TSD facilities	1.5	0	0	0
Lists of Federal RCRA generators	1.25	0	0	0
Federal institutional controls / engineering controls registries	1.5	0	0	0
Federal ERNS list	1.0	0	0	0
Lists of state- and tribal (Superfund) equivalent sites	not searched	-	-	-
Lists of state- and tribal hazardous waste facilities	2.0	0	0	0
Lists of state and tribal landfills and solid waste disposal facilities	1.5	0	0	0
Lists of state and tribal leaking storage tanks	1.5	0	0	0
Lists of state and tribal registered storage tanks	1.25	0	0	0
State and tribal institutional control / engineering control registries	not searched	-	-	-
Lists of state and tribal voluntary cleanup sites	1.5	0	0	0
Lists of state and tribal brownfield sites	1.5	0	0	0

ADDITIONAL ENVIRONMENTAL RECORDS				
Local Brownfield lists	1.5	0	0	0
Local Lists of Landfill / Solid Waste Disposal Sites	1.5	0	0	0
Local Lists of Hazardous waste / Contaminated Sites	1.0	0	0	0
Local Lists of Registered Storage Tanks	not searched	-	-	-
Local Land Records	1.0	0	0	0
Records of Emergency Release Reports	1.0	0	0	0
Other Ascertainable Records	2.0	0	0	0

EDR HIGH RISK HISTORICAL RECORDS				
EDR Exclusive Records	2.0	0	0	0
Exclusive Recovered Govt. Archives	1.0	0	0	0

EXECUTIVE SUMMARY

EDR RECOVERED GOVERNMENT ARCHIVES

EDR Exclusive Records	2.0	0	0	0
Exclusive Recovered Govt. Archives	1.0	0	0	0

*The Default Area of Concern may be adjusted by the environmental professional using experience and professional judgement. Each category may include several databases, and each database may have a different distance. A list of individual databases is provided at the back of this report.

EXECUTIVE SUMMARY

TARGET PROPERTY INFORMATION

ADDRESS

ROBERT SIMMONS SOLAR
FISH SPRINGS ROAD
EMPIRE, NV 89405

COORDINATES

Latitude (North):	40.138474 - 40° 8′ 18.504639″
Longitude (West):	119.929064 - 119° 55′ 44.622803″
Elevation:	3988 ft. above sea level

EXECUTIVE SUMMARY

SEARCH RESULTS

Unmappable (orphan) sites are not considered in the foregoing analysis.

STANDARD ENVIRONMENTAL RECORDS

Name	Address	Dist/Dir	Map ID	Page

Not Reported

ADDITIONAL ENVIRONMENTAL RECORDS

Name	Address	Dist/Dir	Map ID	Page

Not Reported

EDR HIGH RISK HISTORICAL RECORDS

Name	Address	Dist/Dir	Map ID	Page

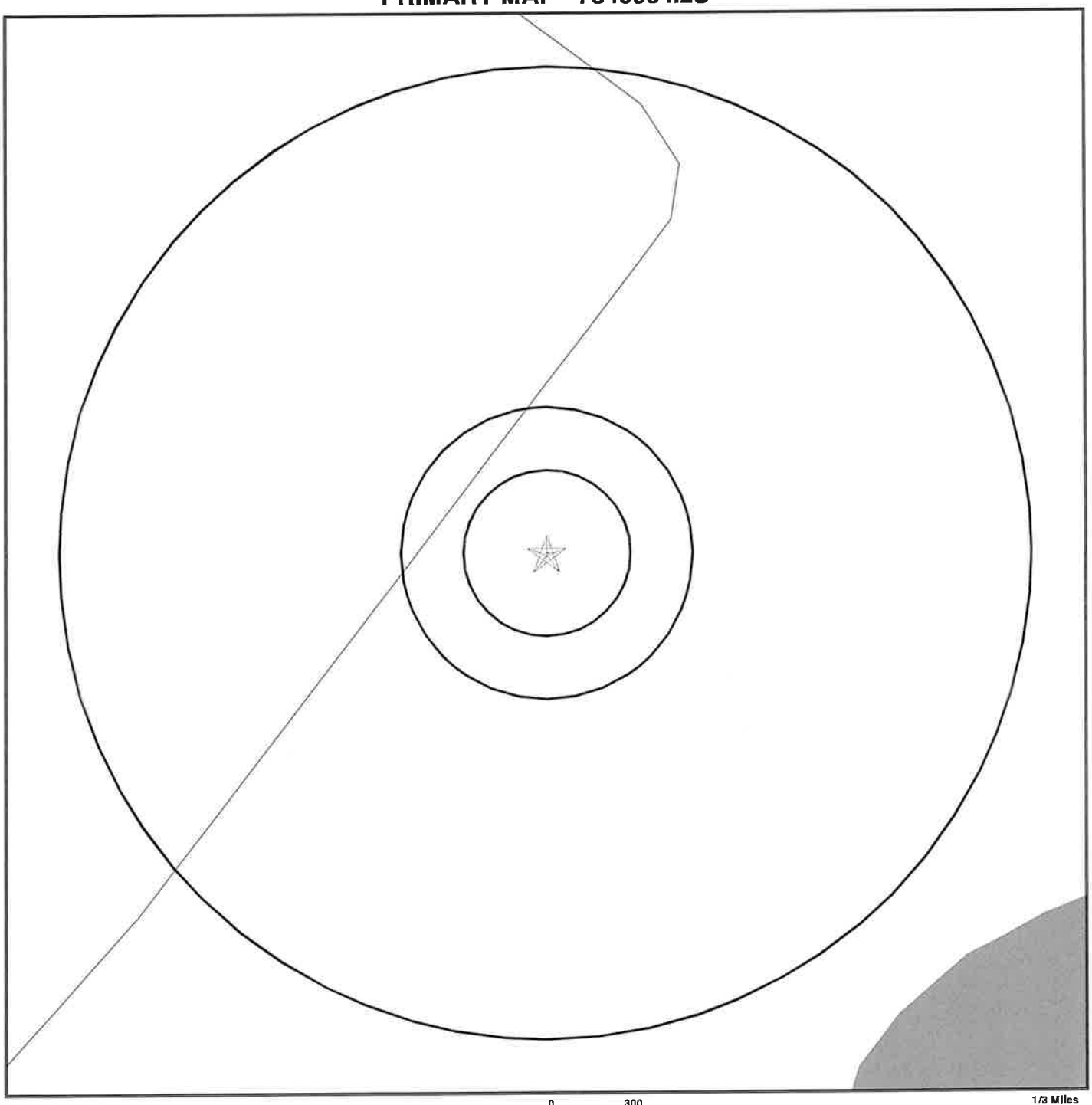
Not Reported

EDR RECOVERED GOVERNMENT ARCHIVES

Name	Address	Dist/Dir	Map ID	Page

Not Reported

PRIMARY MAP - 7840954.2S



0 300 1/3 Miles

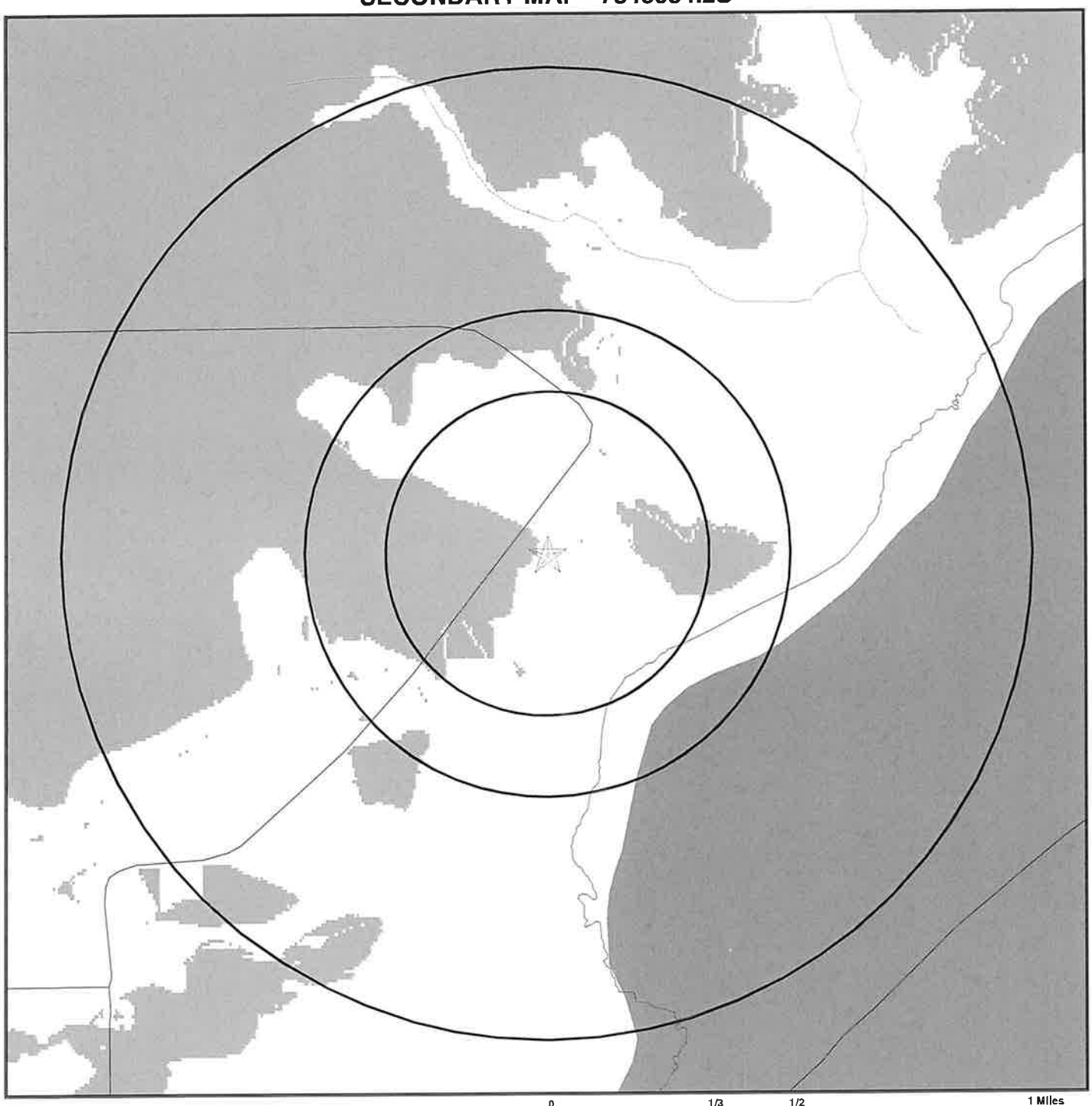
- ☆ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Special Flood Hazard Area (1%)
- 0.2% Annual Chance Flood Hazard
- National Wetland Inventory
- State Wetlands

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Robert Simmons Solar ADDRESS: Fish Springs Road Empire NV 89405 LAT/LONG: 40.138474 / 119.929064	CLIENT: McGinley Associates CONTACT: Anna Henry, E.I., C.E.M. #2497, Exp. Date 09/23/20 INQUIRY #: 7840954.2s DATE: December 05, 2024 4:44 pm

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SECONDARY MAP - 7840954.2S



- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Special Flood Hazard Area (1%)
- 0.2% Annual Chance Flood Hazard
- National Wetland Inventory
- State Wetlands
- Upgradient Area

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Robert Simmons Solar ADDRESS: Fish Springs Road Empire NV 89405 LAT/LONG: 40.138474 / 119.929064	CLIENT: McGinley Associates CONTACT: Anna Henry, E.I., C.E.M. #2497, Exp. Date 09/23/20 INQUIRY #: 7840954.2s DATE: December 05, 2024 4:44 pm

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MAP FINDINGS

LEGEND

FACILITY NAME **FACILITY ADDRESS, CITY, ST, ZIP**		**EDR SITE ID NUMBER**
◆ MAP ID#	Direction Distance Range (Distance feet / miles) Relative Elevation Feet Above Sea Level	ASTM 2600 Record Sources found in this report. Each database searched has been assigned to one or more categories. For detailed information about categorization, see the section of the report Records Searched and Currency.

Worksheet:

Comments:
Comments may be added on the online Vapor Encroachment Worksheet.

DATABASE ACRONYM: Applicable categories (A hoverbox with database description).

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
ENVIRONMENTAL RECORDS						
Federal NPL site list						
US	NPL	National Priority List	EPA	09/25/2024	10/01/2024	10/23/2024
US	Proposed NPL	Proposed National Priority List Sites	EPA	09/25/2024	10/01/2024	10/23/2024
US	NPL LIENS	Federal Superfund Liens	EPA	10/15/1991	02/02/1994	03/30/1994
Federal CERCLIS list						
US	SEMS	Superfund Enterprise Management System	EPA	09/25/2024	10/01/2024	10/23/2024
Federal RCRA CORRACTS facilities list						
US	CORRACTS	Corrective Action Report	EPA	06/03/2024	06/07/2024	06/20/2024
Federal RCRA TSD facilities list						
US	RCRA-TSDF	RCRA - Treatment, Storage and Disposal	Environmental Protection Agency	06/03/2024	06/07/2024	06/20/2024
Federal RCRA generators list						
US	RCRA-LQG	RCRA - Large Quantity Generators	Environmental Protection Agency	06/03/2024	06/07/2024	06/20/2024
US	RCRA-SQG	RCRA - Small Quantity Generators	Environmental Protection Agency	06/03/2024	06/07/2024	06/20/2024
US	RCRA-VSQG	RCRA - Very Small Quantity Generators (Formerly Conditionall	Environmental Protection Agency	06/03/2024	06/07/2024	06/20/2024
Federal institutional controls / engineering controls registries						
US	LUCIS	Land Use Control Information System	Department of the Navy	07/15/2024	07/17/2024	10/09/2024
US	US ENG CONTROLS	Engineering Controls Sites List	Environmental Protection Agency	07/24/2024	08/08/2024	08/15/2024
US	US INST CONTROLS	Institutional Controls Sites List	Environmental Protection Agency	07/24/2024	08/08/2024	08/15/2024
Federal ERNS list						
US	ERNS	Emergency Response Notification System	National Response Center, United States Coast	06/11/2024	06/17/2024	09/04/2024
State and tribal - equivalent CERCLIS						
NV	SHWS	Sites Database	Department of Conservation and Natural Resour	09/09/2024	09/10/2024	12/02/2024
State and tribal landfill / solid waste disposal						
NV	SWF/LF	Landfill List	Department of Conservation and Natural Resour	08/19/2024	08/19/2024	11/04/2024
State and tribal leaking storage tank lists						
NV	LUST	Sites Database	Department of Conservation and Natural Resour	09/09/2024	09/10/2024	12/02/2024
US	INDIAN LUST R7	Leaking Underground Storage Tanks on Indian Land	EPA Region 7	05/07/2024	05/30/2024	08/28/2024
US	INDIAN LUST R9	Leaking Underground Storage Tanks on Indian Land	Environmental Protection Agency	05/07/2024	05/30/2024	08/28/2024
US	INDIAN LUST R5	Leaking Underground Storage Tanks on Indian Land	EPA, Region 5	04/11/2024	05/30/2024	08/28/2024
US	INDIAN LUST R6	Leaking Underground Storage Tanks on Indian Land	EPA Region 6	05/07/2024	05/30/2024	08/28/2024
US	INDIAN LUST R10	Leaking Underground Storage Tanks on Indian Land	EPA Region 10	05/07/2024	05/30/2024	08/28/2024
US	INDIAN LUST R1	Leaking Underground Storage Tanks on Indian Land	EPA Region 1	05/07/2024	05/30/2024	08/28/2024
US	INDIAN LUST R4	Leaking Underground Storage Tanks on Indian Land	EPA Region 4	05/07/2024	05/30/2024	08/28/2024
US	INDIAN LUST R8	Leaking Underground Storage Tanks on Indian Land	EPA Region 8	05/07/2024	05/30/2024	08/28/2024

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GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
State and tribal registered storage tank lists						
NV	UST	Underground Storage Tank List	Department of Conservation and Natural Resour	09/09/2024	09/10/2024	12/02/2024
NV	AST	Aboveground Storage Tank List	Department of Conservation and Natural Resour	01/25/2018	03/21/2018	04/23/2018
US	INDIAN UST R8	Underground Storage Tanks on Indian Land	EPA Region 8	05/14/2024	05/30/2024	08/28/2024
US	INDIAN UST R9	Underground Storage Tanks on Indian Land	EPA Region 9	05/14/2024	05/30/2024	08/28/2024
US	INDIAN UST R1	Underground Storage Tanks on Indian Land	EPA, Region 1	05/14/2024	05/30/2024	08/28/2024
US	INDIAN UST R4	Underground Storage Tanks on Indian Land	EPA Region 4	05/14/2024	05/30/2024	08/28/2024
US	INDIAN UST R7	Underground Storage Tanks on Indian Land	EPA Region 7	05/14/2024	05/30/2024	08/28/2024
US	INDIAN UST R5	Underground Storage Tanks on Indian Land	EPA Region 5	04/11/2024	05/30/2024	08/28/2024
US	INDIAN UST R10	Underground Storage Tanks on Indian Land	EPA Region 10	05/14/2024	05/30/2024	08/28/2024
US	INDIAN UST R6	Underground Storage Tanks on Indian Land	EPA Region 6	05/14/2024	05/30/2024	08/28/2024
US	FEMA UST	Underground Storage Tank Listing	FEMA	03/15/2024	03/19/2024	06/17/2024
State and tribal voluntary cleanup sites						
US	INDIAN VCP R7	Voluntary Cleanup Priority Lisitng	EPA, Region 7	03/20/2008	04/22/2008	05/19/2008
NV	VCP	Voluntary Cleanup Program Sites	Department of Conservation & Natural Resource	09/09/2024	09/10/2024	12/03/2024
US	INDIAN VCP R1	Voluntary Cleanup Priority Listing	EPA, Region 1	07/27/2015	09/29/2015	02/18/2016
State and tribal Brownfields sites						
NV	BROWNFIELDS	Project Tracking Database	Division of Environmental Protection	09/09/2024	09/10/2024	12/02/2024
Other Records						
US	CONSENT	Superfund (CERCLA) Consent Decrees	Department of Justice, Consent Decree Library	06/30/2024	07/08/2024	09/26/2024
US	ROD	Records Of Decision	EPA	10/24/2024	11/01/2024	11/19/2024
US	LIENS 2	CERCLA Lien Information	Environmental Protection Agency	09/25/2024	10/01/2024	10/23/2024
US	DEBRIS REGION 9	Torres Martinez Reservation Illegal Dump Site Locations	EPA, Region 9	01/12/2009	05/07/2009	09/21/2009
NV	SWRCY	Recycling Information Listing	Department of Environmental Protection	08/03/2023	11/09/2023	02/06/2024
US	LEAD SMELTER 1	Lead Smelter Sites	Environmental Protection Agency	09/25/2024	10/01/2024	10/23/2024
US	EPA WATCH LIST	EPA Watch List	Environmental Protection Agency	08/30/2013	03/21/2014	06/17/2014
US	COAL ASH DOE	Steam-Electric Plant Operation Data	Department of Energy	12/31/2022	11/27/2023	02/22/2024
US	2020 COR ACTION	2020 Corrective Action Program List	Environmental Protection Agency	09/30/2017	05/08/2018	07/20/2018
US	FUSRAP	Formerly Utilized Sites Remedial Action Program	Department of Energy	03/03/2023	03/03/2023	06/09/2023
US	US FIN ASSUR	Financial Assurance Information	Environmental Protection Agency	06/10/2024	06/17/2024	09/04/2024
US	COAL ASH EPA	Coal Combustion Residues Surface Impoundments List	Environmental Protection Agency	01/12/2017	03/05/2019	11/11/2019
US	LEAD SMELTER 2	Lead Smelter Sites	American Journal of Public Health	04/05/2001	10/27/2010	12/02/2010
US	US AIRS (AFS)	Aerometric Information Retrieval System Facility Subsystem (	EPA	10/12/2016	10/26/2016	02/03/2017
US	US AIRS MINOR	Air Facility System Data	EPA	10/12/2016	10/26/2016	02/03/2017
US	PCB TRANSFORMER	PCB Transformer Registration Database	Environmental Protection Agency	09/13/2019	11/06/2019	02/10/2020
US	SCRD DRYCLEANERS	State Coalition for Remediation of Drycleaners Listing	Environmental Protection Agency	07/30/2021	02/03/2023	02/10/2023
US	US HIST CDL	National Clandestine Laboratory Register	Drug Enforcement Administration	05/20/2024	08/19/2024	10/09/2024
US	Delisted NPL	National Priority List Deletions	EPA	09/25/2024	10/01/2024	10/23/2024
US	SEMS-ARCHIVE	Superfund Enterprise Management System Archive	EPA	09/25/2024	10/01/2024	10/23/2024
US	RCRA NonGen / NLR	RCRA - Non Generators / No Longer Regulated	Environmental Protection Agency	06/03/2024	06/07/2024	06/20/2024
US	HMIRS	Hazardous Materials Information Reporting System	U.S. Department of Transportation	06/14/2024	06/17/2024	06/24/2024
US	DOT OPS	Incident and Accident Data	Department of Transporation, Office of Pipeli	01/02/2020	01/28/2020	04/17/2020
US	US CDL	Clandestine Drug Labs	Drug Enforcement Administration	05/20/2024	08/19/2024	10/09/2024

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GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
US	US BROWNFIELDS	A Listing of Brownfields Sites	Environmental Protection Agency	06/10/2024	06/11/2024	09/04/2024
US	DOD	Department of Defense Sites	USGS	06/07/2021	07/13/2021	03/09/2022
US	FEDLAND	Federal and Indian Lands	U.S. Geological Survey	04/02/2018	04/11/2018	11/06/2019
US	FUDS	Formerly Used Defense Sites	U.S. Army Corps of Engineers	07/31/2024	08/12/2024	10/09/2024
US	UMTRA	Uranium Mill Tailings Sites	Department of Energy	05/08/2024	08/14/2024	08/28/2024
US	ODI	Open Dump Inventory	Environmental Protection Agency	06/30/1985	08/09/2004	09/17/2004
US	US MINES	Mines Master Index File	Department of Labor, Mine Safety and Health A	08/06/2024	08/14/2024	08/15/2024
US	MINES VIOLATIONS	MSHA Violation Assessment Data	DOL, Mine Safety & Health Admi	10/01/2024	10/02/2024	10/09/2024
US	US MINES 2	Ferrous and Nonferrous Metal Mines Database Listing	USGS	05/02/2024	08/20/2024	10/09/2024
US	US MINES 3	Active Mines & Mineral Plants Database Listing	USGS	04/14/2011	06/08/2011	09/13/2011
US	PRP	Potentially Responsible Parties	EPA	09/19/2023	10/03/2023	10/19/2023
US	TRIS	Toxic Chemical Release Inventory System	EPA	12/31/2022	11/13/2023	02/07/2024
US	TSCA	Toxic Substances Control Act	EPA	12/31/2020	06/14/2022	03/24/2023
US	FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fu	EPA/Office of Prevention, Pesticides and Toxi	04/09/2009	04/16/2009	05/11/2009
US	FTTS INSP	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fu	EPA	04/09/2009	04/16/2009	05/11/2009
US	HIST FTTS	FIFRA/TSCA Tracking System Administrative Case Listing	Environmental Protection Agency	10/19/2006	03/01/2007	04/10/2007
US	HIST FTTS INSP	FIFRA/TSCA Tracking System Inspection & Enforcement Case Lis	Environmental Protection Agency	10/19/2006	03/01/2007	04/10/2007
US	SSTS	Section 7 Tracking Systems	EPA	07/11/2024	07/11/2024	07/12/2024
US	ICIS	Integrated Compliance Information System	Environmental Protection Agency	11/18/2016	11/23/2016	02/10/2017
US	PADS	PCB Activity Database System	EPA	05/23/2024	07/02/2024	09/26/2024
US	MLTS	Material Licensing Tracking System	Nuclear Regulatory Commission	10/12/2024	10/17/2024	11/19/2024
US	RADINFO	Radiation Information Database	Environmental Protection Agency	07/01/2019	07/01/2019	09/23/2019
US	FINDS	Facility Index System/Facility Registry System	EPA	08/13/2024	08/20/2024	08/28/2024
US	RAATS	RCRA Administrative Action Tracking System	EPA	04/17/1995	07/03/1995	08/07/1995
US	RMP	Risk Management Plans	Environmental Protection Agency	07/12/2024	07/17/2024	10/09/2024
US	BRS	Biennial Reporting System	EPA/NTIS	12/31/2021	03/09/2023	03/20/2023
US	PWS	Public Water System Data	EPA	12/17/2013	01/09/2014	10/15/2014
US	INDIAN RESERV	Indian Reservations	USGS	12/31/2014	07/14/2015	01/10/2017
US	INDIAN ODI	Report on the Status of Open Dumps on Indian Lands	Environmental Protection Agency	12/31/1998	12/03/2007	01/24/2008
US	IHS OPEN DUMPS	Open Dumps on Indian Land	Department of Health & Human Serivces, Indian	02/07/2024	11/13/2024	11/19/2024
US	ABANDONED MINES	Abandoned Mines	Department of Interior	09/10/2024	09/11/2024	11/19/2024
NV	AIRS	Permitted Airs Facility Listing	Division of Environmental Protection	06/10/2024	06/12/2024	09/05/2024
NV	COAL ASH	Coal Ash Disposal Sites	Division of Environmental Protection	02/15/2023	02/16/2023	05/11/2023
NV	FIN ASSURANCE 1	Financial Assurance Information Listing	Department of Environmental Protection	06/01/2017	06/19/2017	09/28/2017
NV	FIN ASSURANCE 2	Financial Assurance Information	Division of Environmental Protection	08/19/2024	08/19/2024	11/04/2024
NV	FIN ASSURANCE 3	Financial Assurance Information Listing	Department of Conservation & Natural Resource	07/01/2024	07/02/2024	09/26/2024
NV	HMRI	Hazardous Materials Repository Information Data	State Emergency Response Commission	12/31/2023	05/08/2024	08/06/2024
NV	NPDES	Permitted Facility Listing	Department of Environmental Protection	09/16/2024	09/17/2024	12/03/2024
US	FUELS PROGRAM	EPA Fuels Program Registered Listing	EPA	08/13/2024	08/13/2024	10/09/2024
US	E MANIFEST	Hazardous Waste Electronic Manifest System	Environmental Protection Agency	07/24/2023	04/18/2024	06/06/2024
US	DOCKET HWC	Hazardous Waste Compliance Docket Listing	Environmental Protection Agency	05/06/2021	05/21/2021	08/11/2021
US	MINES MRDS	Mineral Resources Data System	USGS	08/23/2022	11/22/2022	02/28/2023
US	PFAS ATSDR	PFAS Contamination Site Location Listing	Department of Health & Human Services	06/24/2020	03/17/2021	11/08/2022
NV	PFAS	NDEP PFAS Sampling and Analysis	Department of Conservation & Natural Resource	09/04/2024	09/17/2024	12/04/2024
US	PFAS RCRA MANIFEST	PFAS Transfers Identified In the RCRA Database Listing	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024
US	PFAS NPL	Superfund Sites with PFAS Detections Information	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024
US	PFAS NPDES	Clean Water Act Discharge Monitoring Information	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024

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GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
US	ECHO	Enforcement & Compliance History Information	Environmental Protection Agency	06/23/2024	06/28/2024	07/12/2024
US	PFAS ECHO FIRE TRAIN	Facilities in Industries that May Be Handling PFAS Listing	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024
US	PFAS WQP	Ambient Environmental Sampling for PFAS	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024
US	PFAS TSCA	PFAS Manufacture and Imports Information	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024
US	PFAS TRIS	List of PFAS Added to the TRI	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024
US	UXO	Unexploded Ordnance Sites	Department of Defense	09/06/2023	09/13/2023	12/11/2023
US	FEDERAL FACILITY	Federal Facility Site Information listing	Environmental Protection Agency	06/07/2024	06/25/2024	09/19/2024
US	PFAS ECHO	Facilities in Industries that May Be Handling PFAS Listing	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024
US	PFAS PT 139 AIRPORT	All Certified Part 139 Airports PFAS Information Listing	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024
US	PFAS PROJECT	NORTHEASTERN UNIVERSITY PFAS PROJECT	Social Science Environmental Health Research	05/19/2023	04/05/2024	06/06/2024
US	AQUEOUS FOAM NRC	Aqueous Foam Related Incidents Listing	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024
US	PFAS FEDERAL SITES	Federal Sites PFAS Information	Environmental Protection Agency	07/01/2024	07/01/2024	07/12/2024
US	UST FINDER	UST Finder Database	Environmental Protection Agency	06/08/2023	10/04/2023	01/18/2024
US	BIOSOLIDS	ICIS-NPDES Biosolids Facility Data	Environmental Protection Agency	10/13/2024	10/16/2024	10/23/2024
US	PCS	Permit Compliance System	EPA, Office of Water	12/16/2016	01/06/2017	03/10/2017
US	UST FINDER RELEASE	UST Finder Releases Database	Environmental Protecton Agency	06/08/2023	10/31/2023	01/18/2024
HISTORICAL USE RECORDS						
US	EDR MGP	EDR Proprietary Manufactured Gas Plants	EDR, Inc.			
US	EDR Hist Auto	EDR Exclusive Historical Auto Stations	EDR, Inc.			
US	EDR Hist Cleaner	EDR Exclusive Historical Cleaners	EDR, Inc.			
NV	RGA HWS	Recovered Government Archive State Hazardous Waste Facilitie	Department of Conservation and Natural Resour		07/01/2013	12/26/2013
NV	RGA LF	Recovered Government Archive Solid Waste Facilities List	Department of Conservation and Natural Resour		07/01/2013	01/16/2014
NV	RGA LUST	Recovered Government Archive Leaking Underground Storage Tan	Department of Conservation and Natural Resour		07/01/2013	12/26/2013
COUNTY RECORDS						
NV	UST - WASHOE	Underground Storage Tank in Washoe County	Washoe County Department of Environmental Hea	08/03/2020	08/05/2020	08/11/2020

STREET AND ADDRESS INFORMATION

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SUPPORTING ENVIRONMENTAL DOCUMENTATION

UES™

Grounded in Excellence

WHITE—DIVISION OF WATER RESOURCES
CANARY—CLIENT'S COPY
PINK—WELL DRILLER'S COPY

STATE OF NEVADA
DIVISION OF WATER RESOURCES

WELL DRILLERS REPORT

Please complete this form in its entirety

OFFICE USE ONLY
Log No. 20383
Permit No. 30460 38547
Basin

1. OWNER GARY Lee & CLEMENTINE TOPE + RAY MAY ADDRESS FLANIGAN STAR ROUTE FLANIGAN NEVADA

2. LOCATION NE ¼ SW ¼ Sec. 11 T. 26 N/S R. 18 E M.D.M. WASHOE County
PERMIT NO.

3. TYPE OF WORK
New Well ☑ Reconditon ☐
Deepen ☐ Other ☐

4. PROPOSED USE
Domestic ☐ Irrigation ☑ Test ☐
Municipal ☐ Industrial ☐ Stock ☐

5. TYPE WELL
Cable ☐ Rotary ☒
Other ☐

6. LITHOLOGIC LOG

Material	Water Strata	From	To	Thickness
TOP SOIL		0	5	5
SAND		5	10	5
HARD PAN		10	20	10
CLAY		20	50	30
SAND & GRAVEL		50	88	38
BLUE CLAY		88	178	90
SAND & GRAVEL		178	196	18
BLUE SANDY CLAY		196	298	102
WITH GRAVEL BREAKS				

Date started 7-17 19 71
Date completed 7-26 19 71

7. WELL TEST DATA

Pump RPM	G.P.M.	Draw Down	After Hours Pump
SMALL SUB TEMPORARY	30 GAL BAIL TEST	NONE	

BAILER TEST
G.P.M. 30 GAL Draw down NONE feet 4 hours
G.P.M. Draw down feet hours
G.P.M. Draw down feet hours

8. WELL CONSTRUCTION
Diameter hole 18 inches Total depth 298 feet
Casing record 1.88
Weight per foot 3.62 Thickness 1.88

Diameter	From	To
12 ¼ inches	0 feet	295 feet
inches	feet	feet
inches	feet	feet
inches	feet	feet
inches	feet	feet
inches	feet	feet

Surface seal: Yes ☐ No ☒ Type
Depth of seal feet
Gravel packed: Yes ☑ No ☐
Gravel packed from 0 feet to 246 feet

Perforations:
Type perforation 5/B = NEW STEEL
Size perforation 5/32
From 40 feet to 298 feet
From feet to feet
From feet to feet
From feet to feet
From feet to feet

9. WATER LEVEL
Static water level 30 Feet below land surface 30
Flow BAIL TEST G.P.M. NO DRAW DOWN
Water temperature 50 °F. Quality

10. DRILLERS CERTIFICATION
This well was drilled under my supervision and the report is true to the best of my knowledge. DRILLED BY GARY + DAVID TOPE
Name Gary Tope
Address Flanigan Star Route
Nevada contractor's license number
Nevada driller's license number 954
Signed
Date 7-27-71

USE ADDITIONAL SHEETS IF NECESSARY

WHITE—DIVISION OF WATER RESOURCES
CANARY—CLIENT'S COPY
PINK—WELL DRILLER'S COPY

STATE OF NEVADA
DIVISION OF WATER RESOURCES

WELL DRILLERS REPORT

Please complete this form in its entirety

OFFICE USE ONLY
Log No. 20384
Permit No. 20421 38346
Basin

1. OWNER Gary Lee Tope + Clementine Tope RAY MAY ADDRESS Flanigan Star Route Flanigan, Nevada

2. LOCATION SW ¼ NE ¼ Sec. 11 T. 26 N/S R. 18 E E/W Washoe County
PERMIT NO.

3. TYPE OF WORK: New Well [X] Recondition [ ] Deepen [ ] Other [ ]

4. PROPOSED USE: Domestic [ ] Irrigation [X] Test [ ] Municipal [ ] Industrial [ ] Stock [ ]

5. TYPE WELL: Cable [ ] Rotary [X] Other [ ]

6. LITHOLOGIC LOG

Material	Water Strata	From	To	Thickness
TOP Soil		0	10	10
SAND		10	25	15
HARDPAN		25	40	15
SANDY BLUE CLAY		40	200	160
SAND & GRAVEL BREAKS				

Date started 1-20 19 79
Date completed 1-23 19 79

7. WELL TEST DATA

Pump RPM	G.P.M.	Draw Down	After Hours Pump
SMALL SUB temperary	SOGAL BAIL TEST	NONE	

BAILER TEST
G.P.M. 30 GAL Draw down NONE feet 4 hours
G.P.M. Draw down feet hours
G.P.M. Draw down feet hours

8. WELL CONSTRUCTION
Diameter hole 18 inches Total depth 200 feet
Casing record 1.88
Weight per foot 9SPD Thickness 1.88

Diameter	From	To
12 1/4 inches	0 feet	200 feet
inches	feet	feet
inches	feet	feet
inches	feet	feet
inches	feet	feet
inches	feet	feet

Surface seal: Yes [ ] No [ ] Type
Depth of seal feet
Gravel packed: Yes [X] No [ ]
Gravel packed from feet to feet

Perforations:
Type perforation NEW STEEL
Size perforation 5/32
From 0 feet to 200 feet
From feet to feet
From feet to feet
From feet to feet
From feet to feet

9. WATER LEVEL
Static water level 25 Feet below land surface
Flow BAIL TEST G.P.M. NO DRAW DOWN
Water temperature 56 °F. Quality

10. DRILLERS CERTIFICATION
This well was drilled under my supervision and the report is true to the best of my knowledge.
DRILLED BY GARY & DAVID TOPE.
Name Gary Tope
Address Cutter Driller
Nevada contractor's license number 954
Nevada driller's license number
Signed
Date 1-27-79

USE ADDITIONAL SHEETS IF NECESSARY

WHITE—DIVISION OF WATER RESOURCES
CANARY—CLIENT'S COPY
PINK—WELL DRILLER'S COPY

STATE OF NEVADA
DIVISION OF WATER RESOURCES

OFFICE USE ONLY
Log No. 20385
Permit No. 10467 - 10476
Basin

WELL DRILLERS REPORT

Please complete this form in its entirety

1. OWNER Mary Lopez + Clementine Lopez + Ray May ADDRESS Lanigan Star Route Lanigan, Nevada 89518

2. LOCATION NE ¼ SW ¼ Sec. 2 T. 26 N/S R 18 E M.D.M. WASHOE County
PERMIT NO.

3. TYPE OF WORK
New Well ☐ Recondition ☐
Deepen ☐ Other ☐

4. PROPOSED USE
Domestic ☐ Irrigation ☐ Test ☐
Municipal ☐ Industrial ☐ Stock ☐

5. TYPE WELL
Cable ☐ Rotary ☐
Other ☐

6. LITHOLOGIC LOG

Material	Water Strata	From	To	Thickness
TOP SOIL		0	5	5
SAND		5	20	17
SANDY BROWN CLAY		20	30	8
SAND GRAVEL + BOULDERS		30	100	70
BLUE CLAY SANDY		100	230	130
VOLCANIC ROCK		230	235	5

Date started 1-23, 19 79
Date completed 1-26, 19 79

7. WELL TEST DATA

Pump RPM	G.P.M.	Draw Down	After Hours Pump
SMALL SUB TEMPORARY	30 GAL BAIL TEST	NONE	

BAILER TEST
G.P.M. 30 GAL Draw down NONE feet 4 hours
G.P.M. Draw down feet hours
G.P.M. Draw down feet hours

8. WELL CONSTRUCTION
Diameter hole 18 inches Total depth 235 feet
Casing record 1.D. 8 8
Weight per foot 25.20 Thickness .188

Diameter	From	To
12 1/4 inches	0 feet	235 feet
inches	feet	feet
inches	feet	feet
inches	feet	feet
inches	feet	feet
inches	feet	feet

Surface seal: Yes ☐ No ☐ Type
Depth of seal feet
Gravel packed: Yes ☒ No ☐
Gravel packed from feet to feet

Perforations:
Type perforation NEW STEEL
Size perforation 5/32"
From 0 feet to 235 feet
From feet to feet
From feet to feet
From feet to feet
From feet to feet

9. WATER LEVEL
Static water level 20 Feet below land surface
Flow BAIL TEST G.P.M. NO OBSERVATION
Water temperature 51 °F. Quality

10. DRILLERS CERTIFICATION
This well was drilled under my supervision and the report is true to the best of my knowledge.
DRILLED BY - DAVID + GARY TOPE
Name Gary Tope
Address Carson City
Nevada contractor's license number
Nevada driller's license number 934
Signed Gary Tope
Date 1-27-79

USE ADDITIONAL SHEETS IF NECESSARY

WASHOE COUNTY HEALTH DEPARTMENT
DIVISION OF ENVIRONMENTAL SERVICES
Wells at Ninth Street
Reno, Nevada 89520

785-4290

WELL AND WATER SYSTEM PERMIT

Permit Number № 003293

Owner Gary Tope

Address APN # 74-452-01

Driller Gary Tope

Inspection Type Inspector: Date:

Well Construction: _____

Bore Hole _____

Casing _____

Sanitary Seal _____

Seal Affidavit _____

Inspection Type Inspector: Date:

Water System Appurtenances: _____

Pump _____

Tank _____

Controls _____

Pressure Relief Valve _____

Electrical _____

Water Lines _____

Drop Pipe _____

H-713-59

WASHOE COUNTY DISTRICT HEALTH DEPARTMENT
DIVISION OF ENVIRONMENTAL SERVICES

WELL CONSTRUCTION INSPECTION FORM

OWNER Gary Tope DATE 6/28/88

ADDRESS OR PARCEL NUMBER # 74-452-01 Flanigan Star Rt

PERMIT NO. 3293 WELL DRILLED BY Gary Tope

DRILLING METHOD — ROTARY _____ CABLE TOOL _____ OTHER _____

DEPTH _____ CASING SIZE _____ MATERIAL _____

GRAVEL PACKED _____ SANITARY SEAL IN PLACE _____

SAMPLES COLLECTED _____ BACTERIOLOGICAL _____ CHEMICAL _____

APPROXIMATE GPM _____

ESTIMATED BY _____

SET-BACK FROM SEPTIC SYSTEM/S (IF IN PLACE) _____

REMARKS: 7/18/88 cert affirmation DC

INSPECTOR _____ DATE OF FIRST INSPECTION _____

INSPECTOR _____ DATE OF FINAL INSPECTION _____

(Inspection request)

Request for 1st inspection: Date _____ Time _____

Person calling _____ On Site _____

Request for final inspection: Date _____ Time _____

Person calling _____ Time _____

Date and time to seal well _____

WELL CONSTRUCTION PERMIT AND PROPOSED PLOT PLAN

DATE 6-28-88

PERMIT NO. 3293

Owner's Phone # 882-3102

Items to be shown within 150' of proposed well:

1. Property Lines & Dimensions
2. Sewage Disposal System (If in place)
3. Water Bodies (lakes, streams, etc.)
4. Drainage Pattern
5. Existing Wells
6. Indicate setback from property line
7. Structures (If in place)
8. Roads or Highways (by name)

Owner of Proposed Well Gary Tope

Address 6441 Hwy 50E Carson

Address at Site Flanigan Star Rt

Parcel Number 74-452-01

NE ¼ SW ¼ Sec 2 T 26 R 18

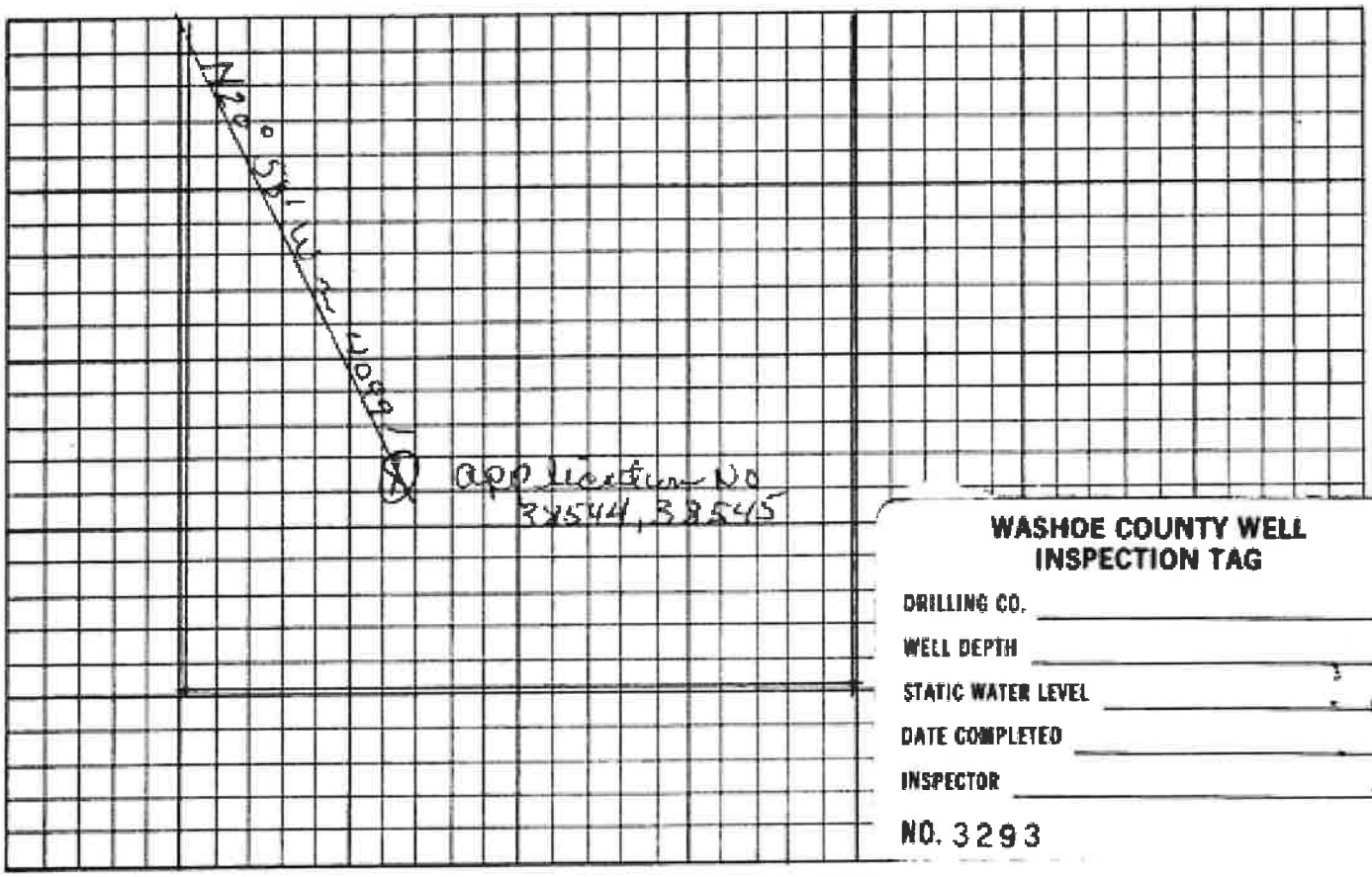
New Well _____ Modification Recompletion

Well Drilling Company Gary Tope

Approximate Depth 600'

Use of Well Irrigation

PLOT PLAN



WASHOE COUNTY WELL INSPECTION TAG

DRILLING CO. _____

WELL DEPTH _____

STATIC WATER LEVEL _____

DATE COMPLETED _____

INSPECTOR _____

NO. 3293

COPY TO BE ON WELL SITE

WELL CONSTRUCTION PERMIT AND PROPOSED PLOT PLAN

DATE 6/28/88

PERMIT NO. 3294

Owner's Phone # 882-3102

Items to be shown within 150' of proposed well:

1. Property Lines & Dimensions
2. Sewage Disposal System (if in place)
3. Water Bodies (lakes, streams, etc.)
4. Drainage Pattern
5. Existing Wells
6. Indicate setback from property line
7. Structures (if in place)
8. Roads or Highways (by name)

Owner of Proposed Well Gary Tope

Address 6441 Hwy 50 E Carson

Address at Site Flanigan Star Rt

Parcel Number 74-103-01

NE ¼ SW ¼ Sec 11 T 26 R 18

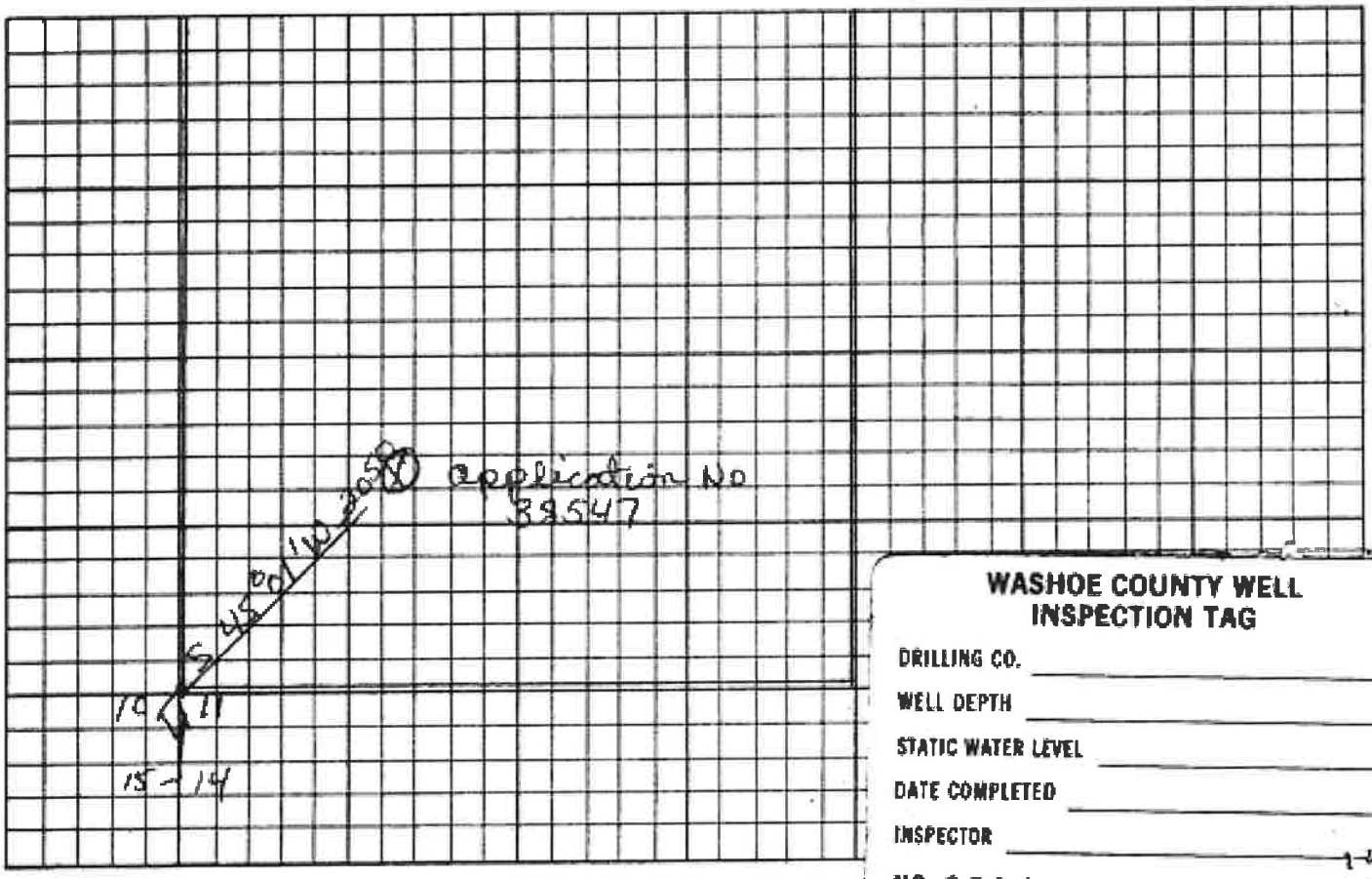
New Well ____ Recompletion / Modification ____

Well Drilling Company Gary Tope

Approximate Depth 600'

Use of Well Irrigation

PLOT PLAN



COPY TO BE ON WELL SITE

WASHOE COUNTY WELL INSPECTION TAG

DRILLING CO. ____

WELL DEPTH ____

STATIC WATER LEVEL ____

DATE COMPLETED ____

INSPECTOR ____

NO. 3294

WASHOE COUNTY DISTRICT HEALTH DEPARTMENT
DIVISION OF ENVIRONMENTAL SERVICES

WELL CONSTRUCTION INSPECTION FORM

OWNER Gary Tope DATE 6/28/88

ADDRESS OR PARCEL NUMBER #74-103-01 Flanigan Star Rt.

PERMIT NO. 3294 WELL DRILLED BY Gary Tope

DRILLING METHOD — ROTARY _____ CABLE TOOL _____ OTHER _____

DEPTH _____ CASING SIZE _____ MATERIAL _____

GRAVEL PACKED _____ SANITARY SEAL IN PLACE _____

SAMPLES COLLECTED _____ BACTERIOLOGICAL _____ CHEMICAL _____

APPROXIMATE GPM _____

ESTIMATED BY _____

SET-BACK FROM SEPTIC SYSTEM/S (IF IN PLACE) _____

REMARKS: 7/18/88 verbal affirmation D.C.

INSPECTOR _____ DATE OF FIRST INSPECTION _____

INSPECTOR _____ DATE OF FINAL INSPECTION _____

(Inspection request)

Request for 1st inspection: Date _____ Time _____

Person calling _____ On Site _____

Request for final inspection: Date _____ Time _____

Person calling _____ Time _____

Date and time to seal well _____

WASHOE COUNTY HEALTH DEPARTMENT
DIVISION OF ENVIRONMENTAL SERVICES
Wells at Ninth Street
Reno, Nevada 89520

785-4290

WELL AND WATER SYSTEM PERMIT

Permit Number Nº 003294

Owner Gary Tope

Address APN #74-103-01

Driller Gary Tope

Inspection Type Inspector: Date:

Well Construction: _____

Bore Hole _____

Casing _____

Sanitary Seal _____

Seal Affidavit _____

Inspection Type Inspector: Date:

Water System Appurtenances: _____

Pump _____

Tank _____

Controls _____

Pressure Relief Valve _____

Electrical _____

Water Lines _____

Drop Pipe _____

H-713-59

WASHOE COUNTY HEALTH DEPARTMENT
DIVISION OF ENVIRONMENTAL SERVICES
Wells at Ninth Street
Reno, Nevada 89520

785-4290

WELL AND WATER SYSTEM PERMIT

Permit Number № 003292

Owner GARY TOPE

Address APN # 74-103-01

Driller GARY TOPE

Inspection Type Inspector: Date:

Well Construction: _____

Bore Hole _____

Casing _____

Sanitary Seal _____

Seal Affidavit _____

Inspection Type Inspector: Date:

Water System Appurtenances: _____

Pump _____

Tank _____

Controls _____

Pressure Relief Valve _____

Electrical _____

Water Lines _____

Drop Pipe _____

H-713-59

Bob B.
area

WASHOE COUNTY DISTRICT HEALTH DEPARTMENT
DIVISION OF ENVIRONMENTAL SERVICES

WELL CONSTRUCTION INSPECTION FORM

OWNER Gary Tope DATE 6/28/88

ADDRESS OR PARCEL NUMBER #74-103-01 Flanigan Star Rt.

PERMIT NO. 3292 WELL DRILLED BY Gary Tope

DRILLING METHOD — ROTARY _____ CABLE TOOL _____ OTHER _____

DEPTH _____ CASING SIZE _____ MATERIAL _____

GRAVEL PACKED _____ SANITARY SEAL IN PLACE _____

SAMPLES COLLECTED _____ BACTERIOLOGICAL _____ CHEMICAL _____

APPROXIMATE GPM _____

ESTIMATED BY _____

SET-BACK FROM SEPTIC SYSTEM/S (IF IN PLACE) _____

REMARKS: 7/18/88 sent affirmation W.C

INSPECTOR _____ DATE OF FIRST INSPECTION _____

INSPECTOR _____ DATE OF FINAL INSPECTION _____

(Inspection request)

Request for 1st Inspection: Date _____ Time _____

Person calling _____ On Site _____

Request for final Inspection: Date _____ Time _____

Person calling _____ Time _____

Date and time to seal well _____

WELL CONSTRUCTION PERMIT AND PROPOSED PLOT PLAN

DATE 6-28-88

PERMIT NO. 3292

Owner's Phone # 882-3102

Items to be shown within 150' of proposed well:

1. Property Lines & Dimensions
2. Sewage Disposal System (if in place)
3. Water Bodies (lakes, streams, etc.)
4. Drainage Pattern
5. Existing Wells
6. Indicate setback from property line
7. Structures (if in place)
8. Roads or Highways (by name)

Owner of Proposed Well Dary Tope

Address 6441 Hwy 50 E Carson

Address at Site Flanigan Star Rt

Parcel Number 74-103-01

SW ¼ NE ¼ Sec 11 T 26 R 18

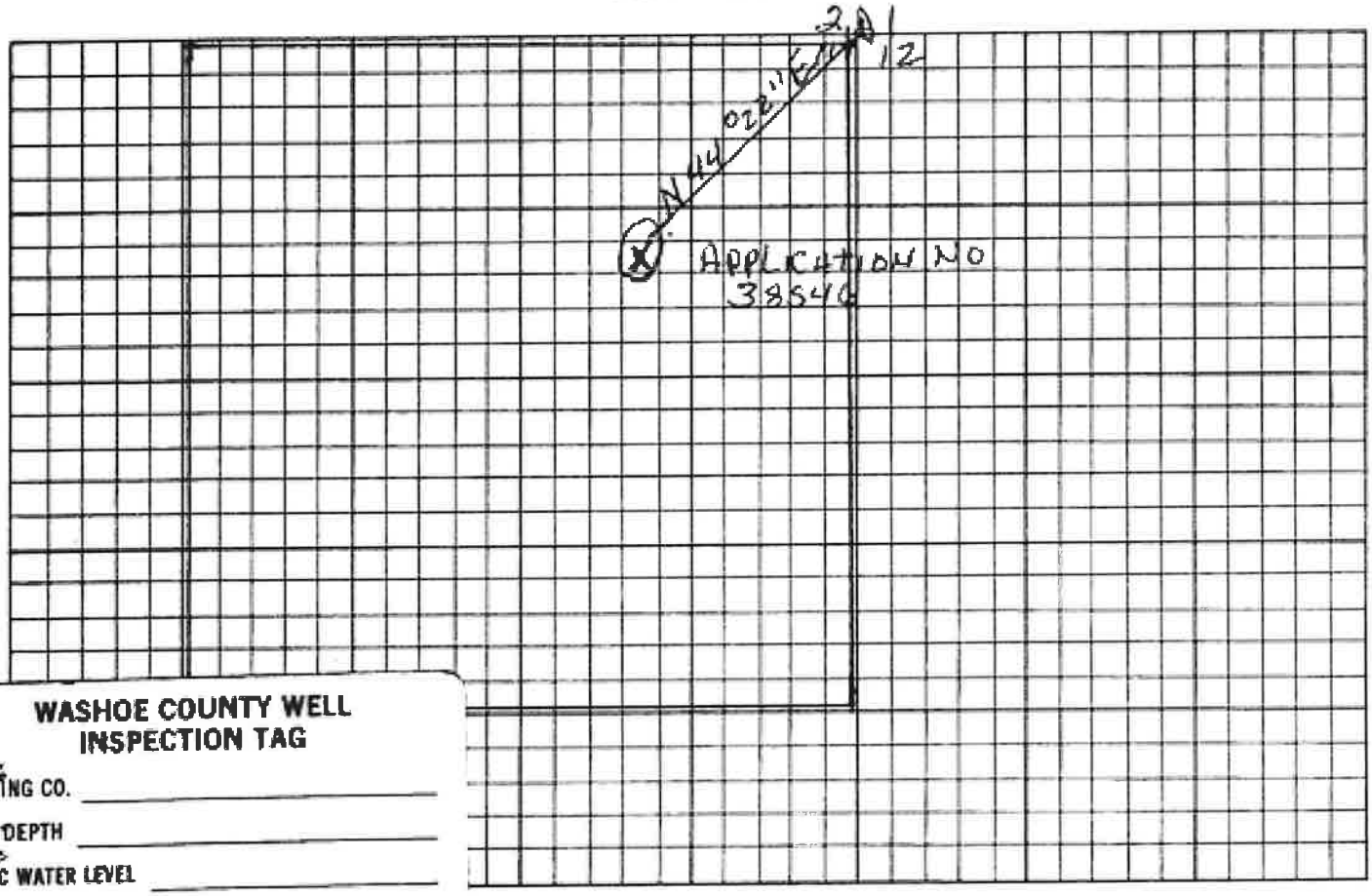
New Well _____ Modification Reconstruction

Well Drilling Company Dary Tope

Approximate Depth 600'

Use of Well Irrigation

PLOT PLAN



WASHOE COUNTY WELL INSPECTION TAG

DRILLING CO. _____

WELL DEPTH _____

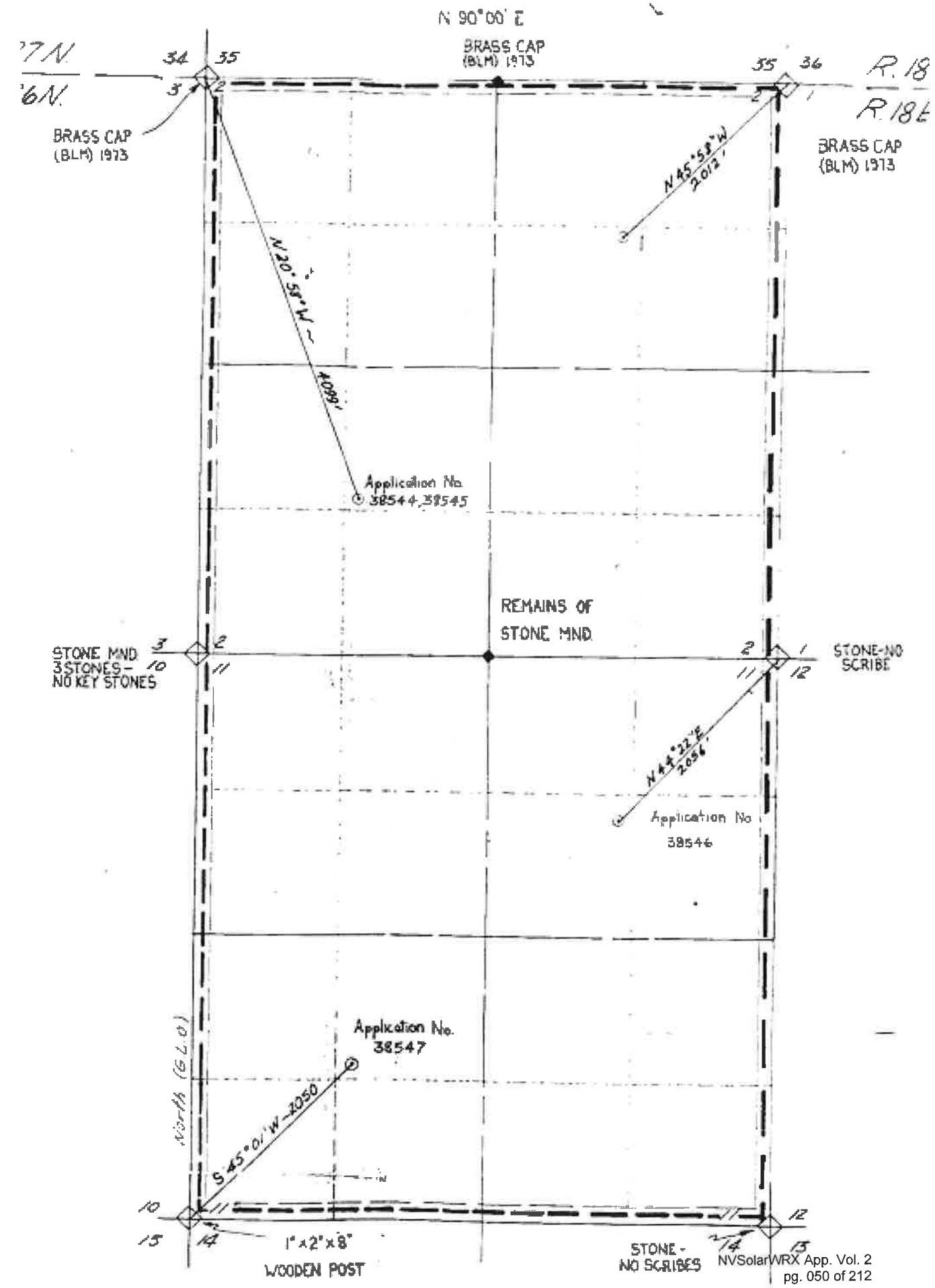
STATIC WATER LEVEL _____

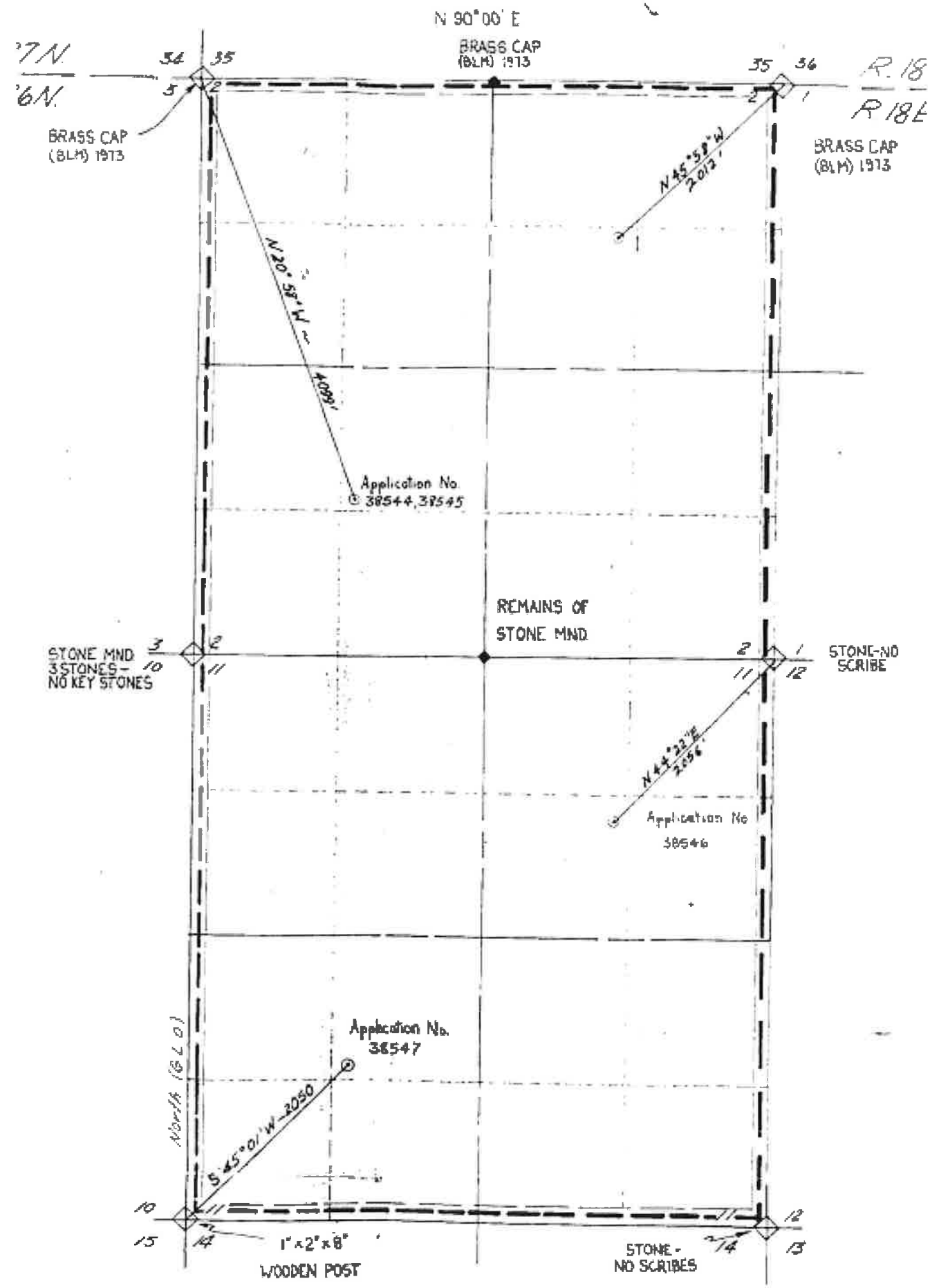
DATE COMPLETED _____

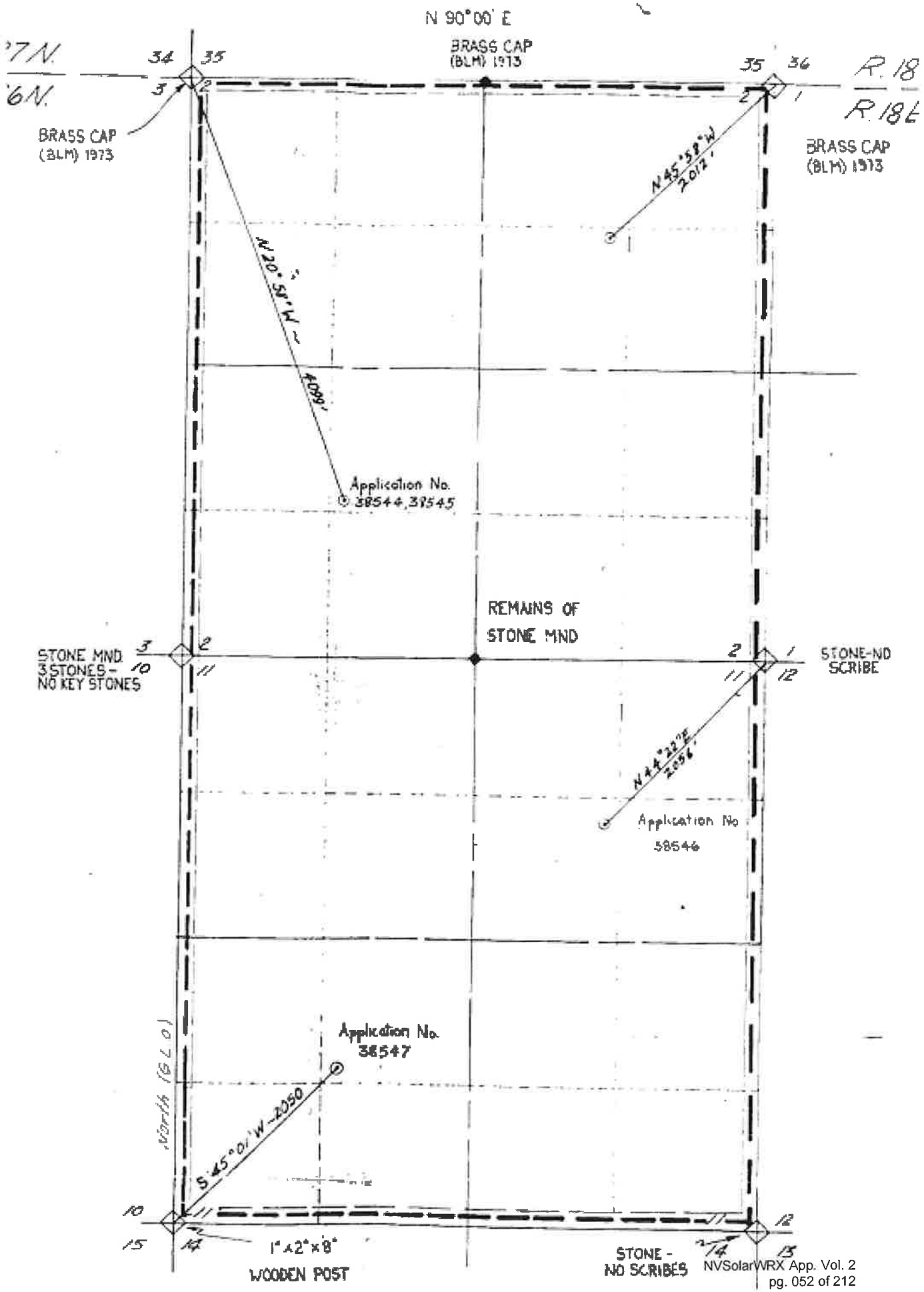
INSPECTOR _____

NO. 3292

COPY TO BE ON WELL SITE


N 90°00' E
27N
26N
34
35
3
2
BRASS CAP
(BLM) 1973
35
36
R. 18
R. 18E
BRASS CAP
(BLM) 1973
BRASS CAP
(BLM) 1973
N 20° 59' W ~
4099'
N 45° 58' W
2012'
Application No.
38544, 38545
REMAINS OF
STONE MND
STONE MND
3 STONES -
NO KEY STONES
3
2
10
11
2
1
12
STONE-NO
SCRIBE
N 44° 22' E
2056'
Application No
38546
Application No.
38547
S 45° 01' W - 2050'
10
15
14
1" x 2" x 8"
WOODEN POST
12
13
STONE -
NO SCRIBES

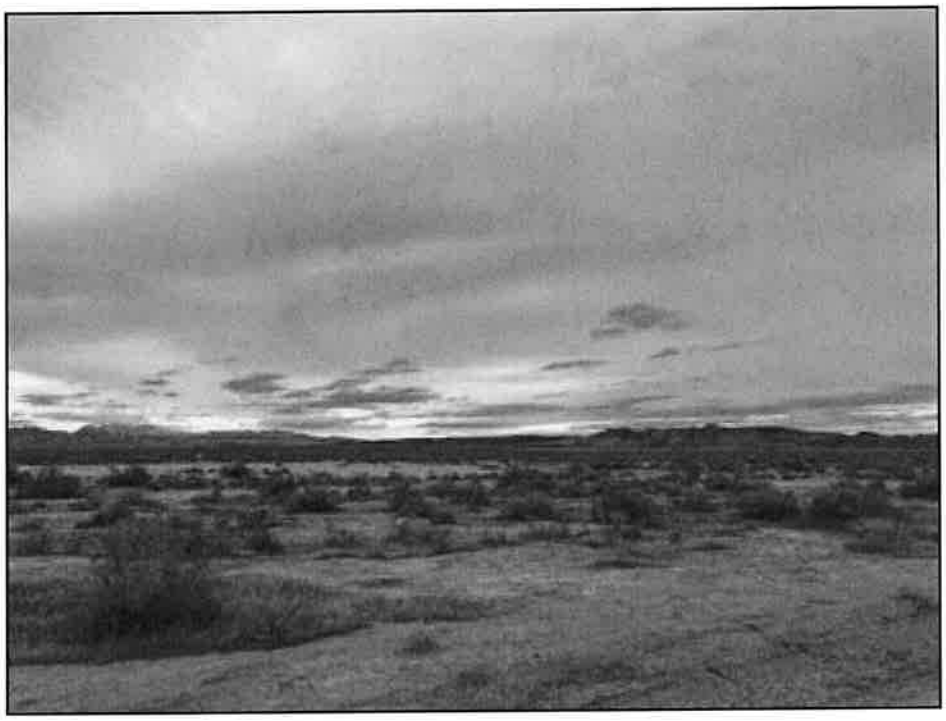

N 90° 00' E
BRASS CAP
(BLM) 1913
BRASS CAP
(BLM) 1913
BRASS CAP
(BLM) 1913
N 45° 58' W
2013'
N 20° 58' W
1660'
Application No.
38544, 38545
REMAINS OF
STONE MND.
STONE MND
3 STONES -
NO KEY STONES
STONE-NO
SCRIBE
N 44° 32' E
2054'
Application No
38546
Application No.
38547
S 45° 01' W 2050'
1" x 2" x 8"
WOODEN POST
STONE -
NO SCRIBES


N 90°00' E
'7N.
'6N.
34
35
3
2
BRASS CAP
(BLM) 1973
BRASS CAP
(BLM) 1973
35
36
2
1
R. 18
R. 18E
BRASS CAP
(BLM) 1973
N45°58'W
2012'
N 20°54'W
4089'
Application No.
38544, 38545
REMAINS OF
STONE MND
STONE MND
3 STONES -
NO KEY STONES
3
2
10
11
2
1
11
12
STONE-ND
SCRIBE
N 44°22'E
2056'
Application No
38546
North (G.L.O.)
Application No.
38547
S 45°01'W - 2050'
10
11
12
15
14
1" x 2" x 8"
WOODEN POST
14
13
STONE -
NO SCRIBES

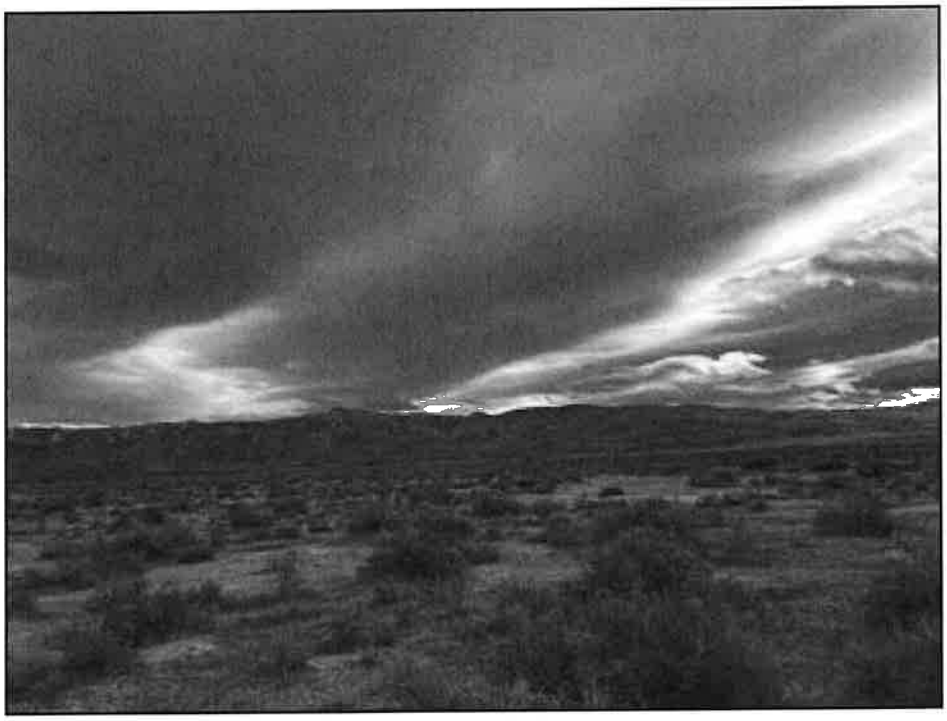
PHOTOGRAPHS

UES™

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1: View of the subject property.



2: View of the subject property.



3: View of the subject property.



4: View of the subject property.



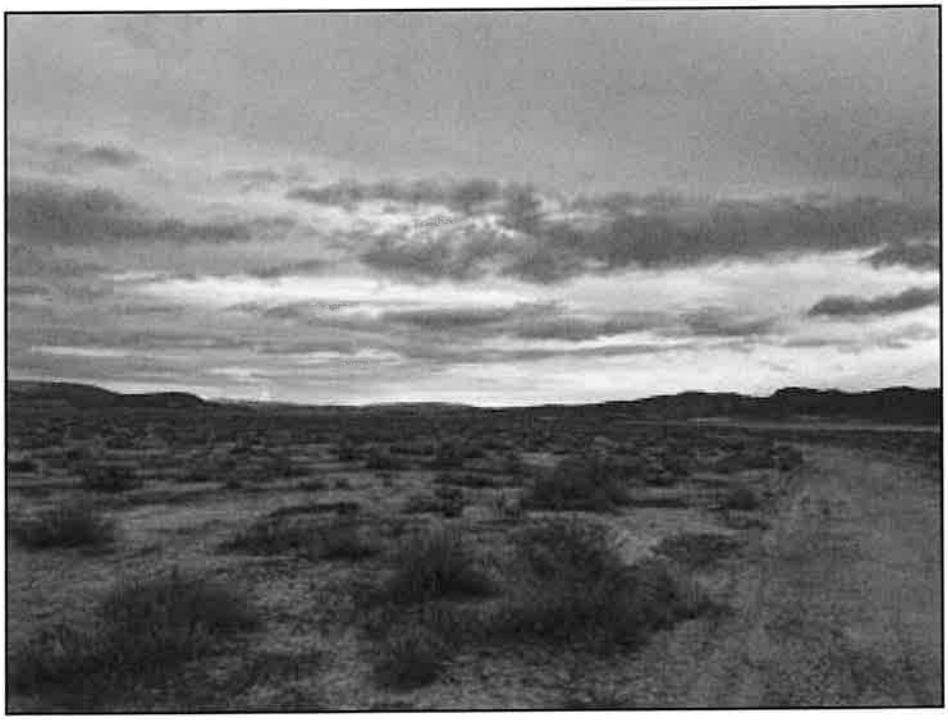
5: View of the subject property.



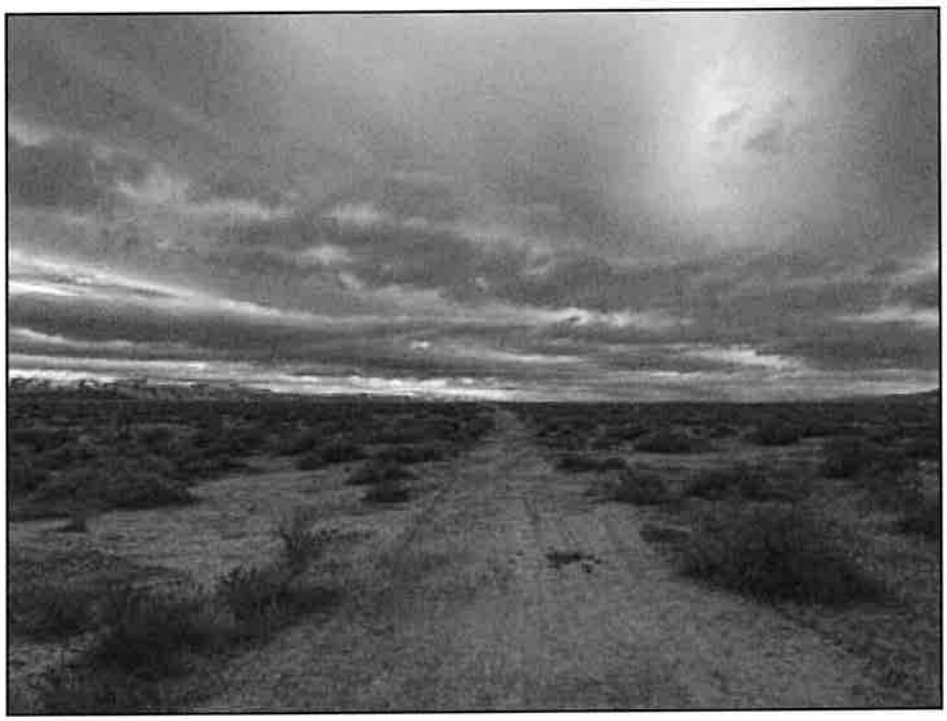
6: View of the subject property.



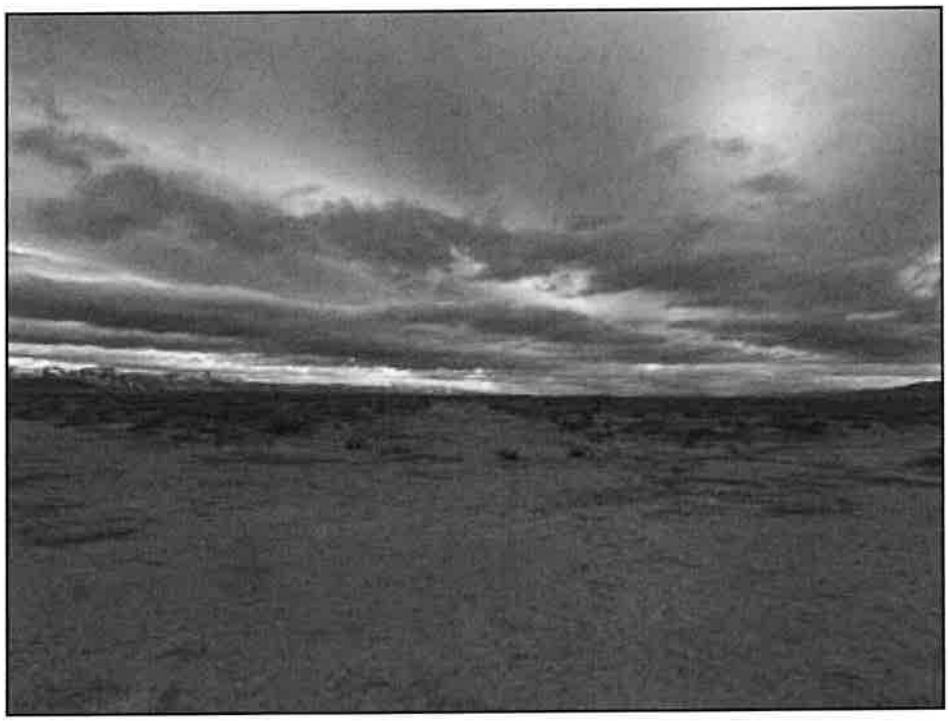
7: View of the subject property.



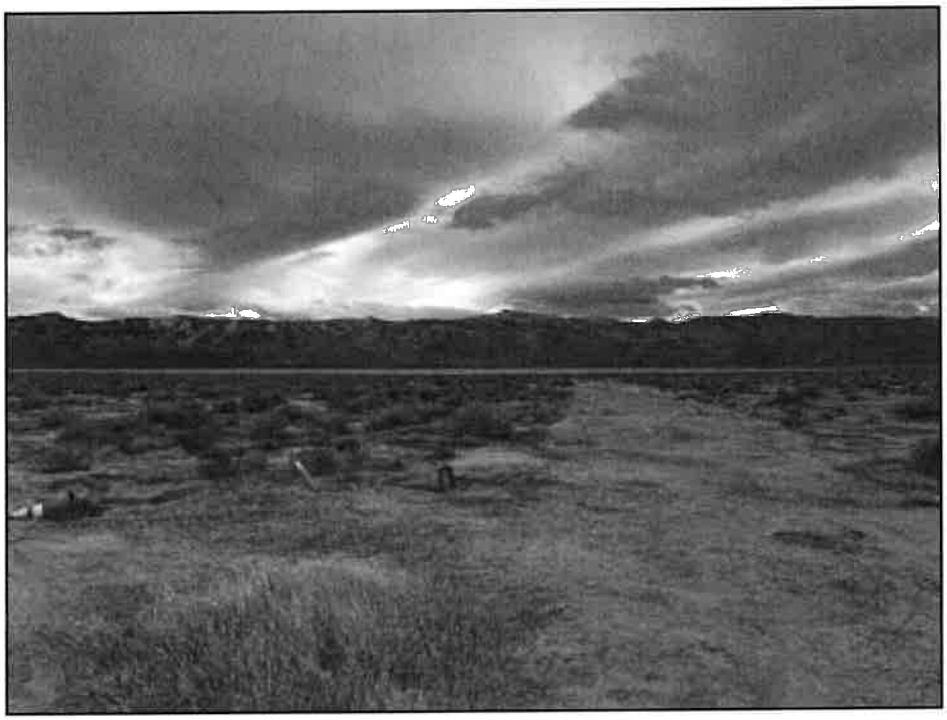
8: View of the subject property.



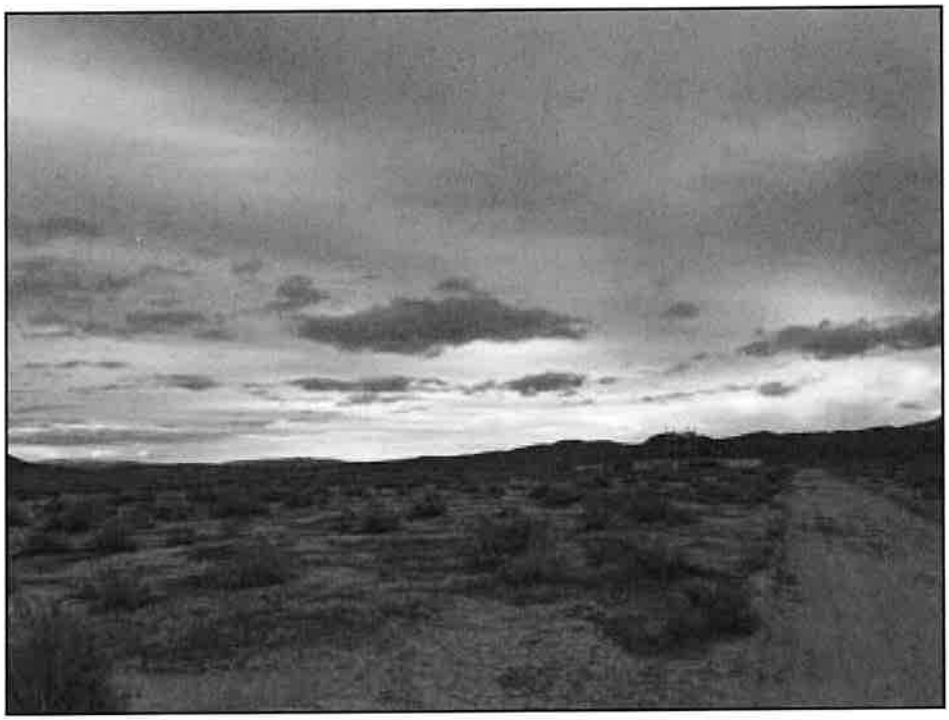
9: View of the subject property.



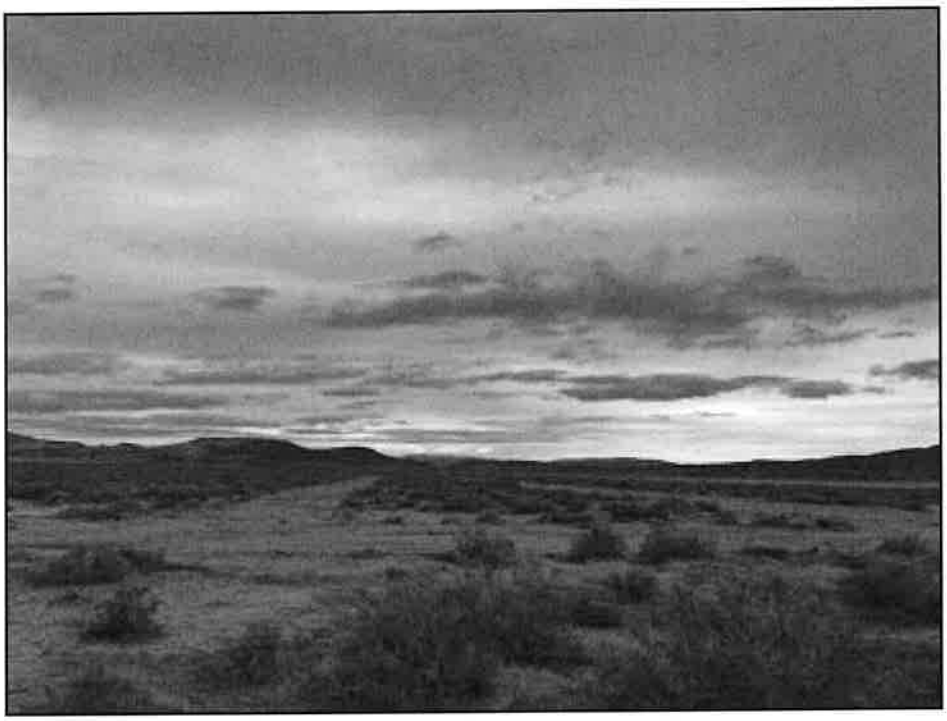
10: View of the graded land on the subject property.



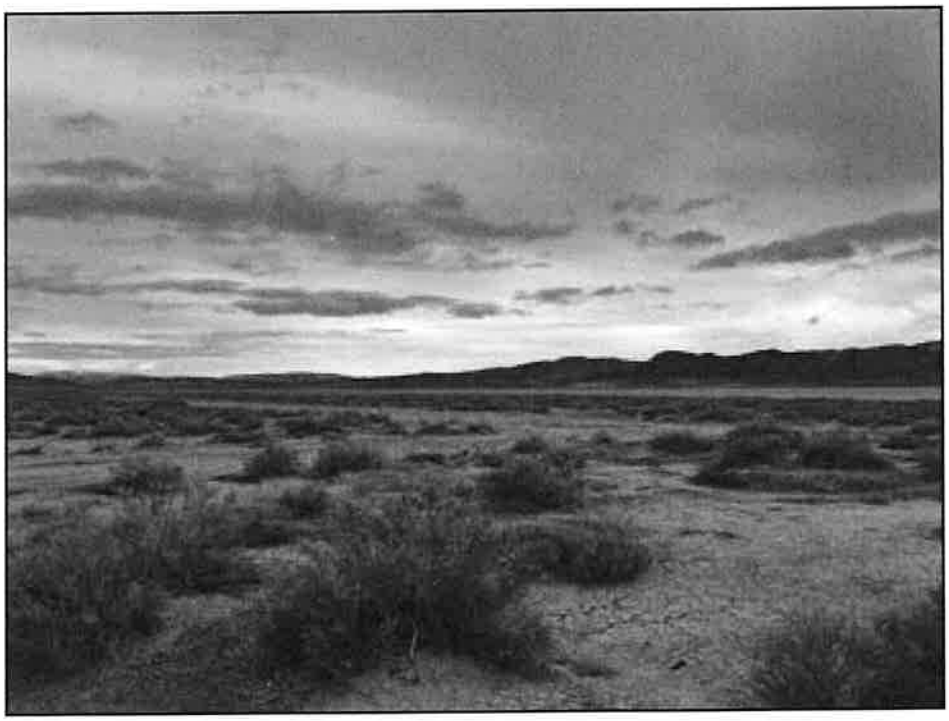
11: View of the graded land on the subject property.



12: View of the subject property.



13: View of the airstrips on the subject property.



14: View of the airstrips on the subject property.



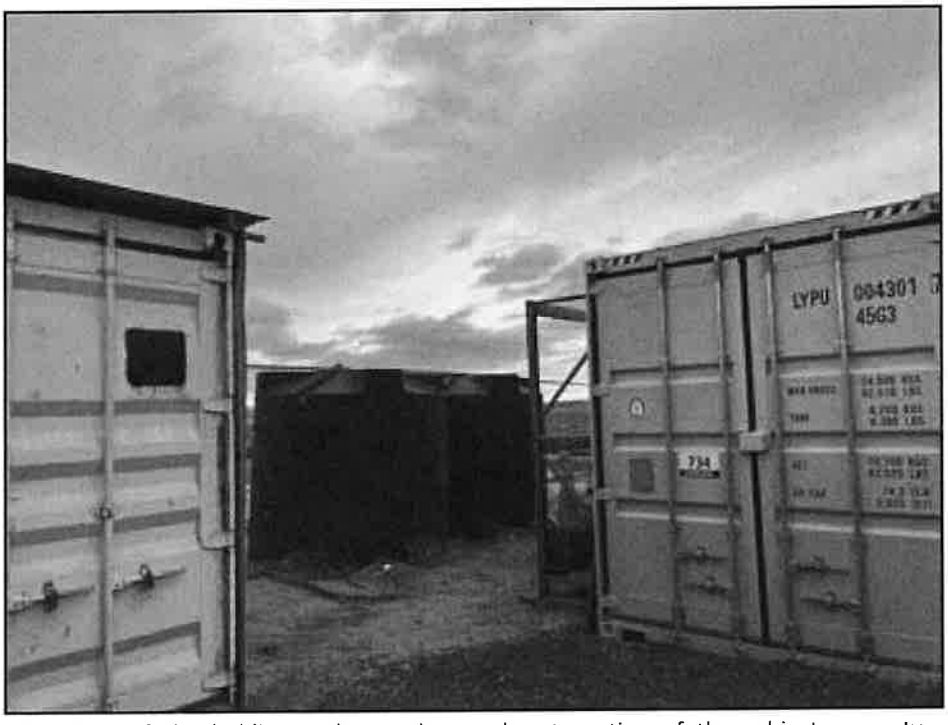
15: View of the tiedowns on the subject property.



16: View of the structures on the southeast portion of the subject property.



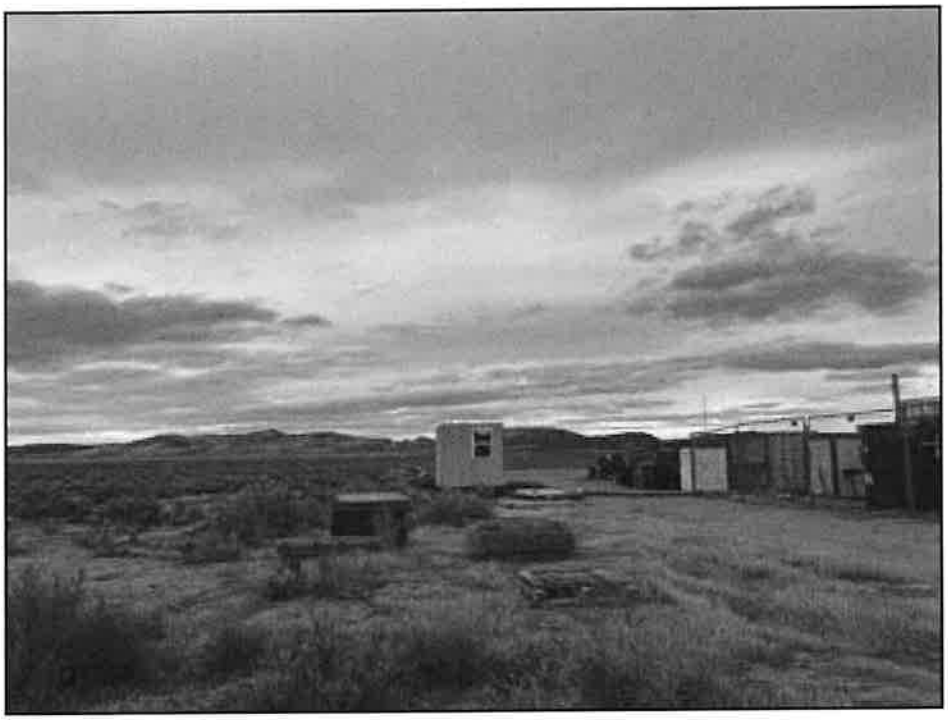
17: View of the structures on the southeast portion of the subject property.



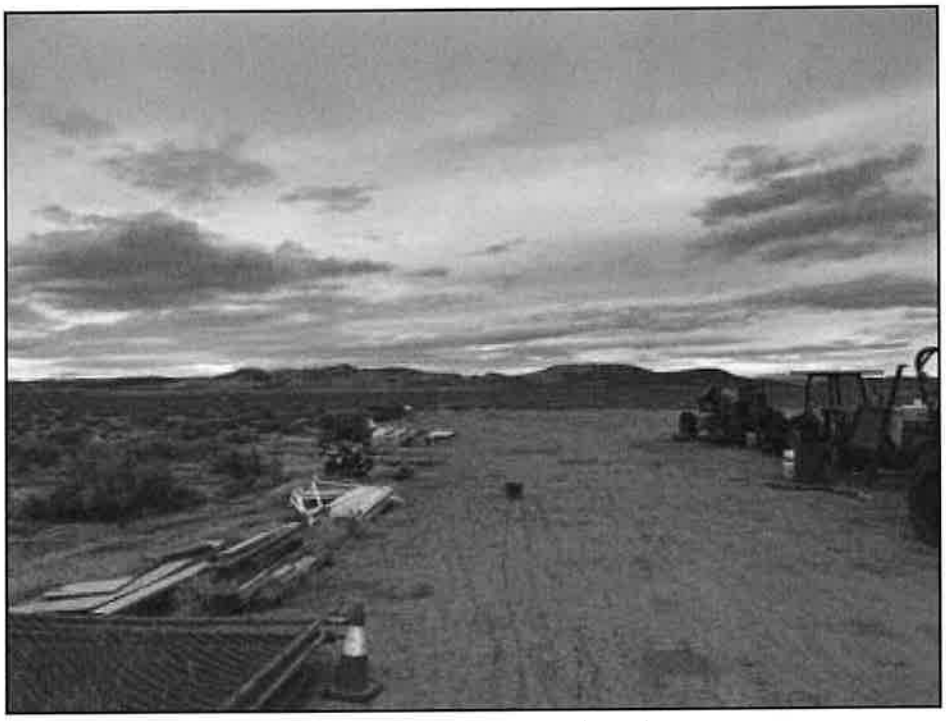
18: View of the holding tanks on the southeast portion of the subject property.



19: View of the automotive transmission fluid tote on the subject property.



20: View of the structures on the southeast portion of the subject property.



21: View of the southeast portion of the subject property.

INTERVIEW DOCUMENTATION

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ENVIRONMENTAL OWNER QUESTIONNAIRE

Site Address: APNs 074-452-01, 074-103-01, 074-103-05, and 074-451-20, Washoe County, NV

	QUESTION: IF "YES" IS ANSWERED, PLEASE PROVIDE A WRITTEN EXPLANATION IN THE SPACE BELOW THE QUESTION.	ANSWER
1.	Is the *property* or any *adjoining property* used *for an industrial use?*	Yes (No) Unknown
2.	To the best of your knowledge, has the *property* or any *adjoining property* been used for an industrial use in the past?	Yes (No) Unknown
3.	Is the *property* or any *adjoining property* used as a gas station, automotive repair facility, commercial printing facility, dry cleaning facility, photo developing laboratory, junkyard or landfill, or waste treatment, storage, disposal, processing, or recycling facility?	Yes (No) Unknown
4.	To the best of your knowledge has the *property* or any *adjoining property* been used as a gas station, automotive repair facility, commercial printing facility, dry cleaning facility, photo developing laboratory, junkyard or landfill, or waste treatment, storage, disposal, processing, or recycling facility in the past?	Yes (No) Unknown
5.	Are there currently, or to the best of your knowledge have there been previously, any damaged or discarded automobile or industrial batteries, pesticides, paints, or other chemicals in individual containers of greater than 5 gal (19 L) in volume or 50 gal (190 L) in the aggregate, stored on or used at the *property* or at the facility?	Yes (No) Unknown
6.	Are there currently, or to the best of your knowledge have there been previously, any industrial *drums* (typically 55 gal [208 L]) or sacks of chemicals located on the property or at the facility?	Yes (No) Unknown
7.	Has *fill dirt* been brought onto the property that originated from a contaminated site or that is of an unknown origin?	Yes (No) Unknown

Initials: _____

Date: 12/12/24

ENVIRONMENTAL OWNER QUESTIONNAIRE

Site Address: APNs 074-452-01, 074-103-01, 074-103-05, and 074-451-20, Washoe County, NV

	QUESTION: IF "YES" IS ANSWERED, PLEASE PROVIDE A WRITTEN EXPLANATION IN THE SPACE BELOW THE QUESTION.	ANSWER
8.	Are there currently, or to the best of your knowledge have there been previously, any *pits, ponds, or lagoons* located on the *property* in connection with waste treatment or waste disposal?	Yes (No) Unknown
9.	Is there currently, or to the best of your knowledge have there been previously, any stained soil on the *property*?	Yes (No) Unknown
10.	Are there currently, or to the best of your knowledge have there been previously, any registered or unregistered storage tanks (above or underground) located on the *property*?	Yes (No) Unknown
11.	Are there currently, or to the best of your knowledge have there been previously, any vent pipes, fill pipes, or access ways indicating a fill pipe protruding from the ground on the *property* adjacent to any structure located on the *property*?	Yes (No) Unknown
12.	Are there currently, or to the best of your knowledge have there been previously, any flooring, drains, or walls located within the facility that are stained by substances other than water or are emitting foul odors?	Yes (No) Unknown
13.	If the *property* is served by a private well or non-public water system, have contaminants been identified in the well or system that exceed guidelines applicable to the water system or has the well been designated contaminated by any government environmental/health agency?	Yes (No) Unknown

Initials: [signature]

Date: 12/12/24

ENVIRONMENTAL OWNER QUESTIONNAIRE

Site Address: APNs 074-452-01, 074-103-01, 074-103-05, and 074-451-20, Washoe County, NV

	QUESTION: IF "YES" IS ANSWERED, PLEASE PROVIDE A WRITTEN EXPLANATION IN THE SPACE BELOW THE QUESTION.	ANSWER
14.	Does the *owner* or *occupant* of the *property* have any knowledge of *environmental liens* or governmental notification relating to past or recurring violations of environmental laws with respect to the *property* or any facility located on the *property*?	Yes (No) Unknown
15.	Has the *owner* or *occupant* of the *property* been informed of a past or current existence of *hazardous substances*, petroleum products, and/or environmental violations with respect to the *property* or any facility located on the *property*?	Yes (No) Unknown
16.	Does the *owner* or *occupant* of the property have any knowledge of any environmental site assessment for the *property* or facility that indicated the presence of *hazardous substances* or *petroleum products*, contamination of the *property*, and/or recommended further assessment of the *property*?	Yes (No) Unknown
17.	Does the *owner* or *occupant* of the *property* know of any past, threatened, or pending lawsuits or administrative proceedings concerning a release or threatened release of any *hazardous substance* or *petroleum products* involving the *property* by any owner or occupant of the *property*?	Yes (No) Unknown
18.	Does the property discharge wastewater on or adjacent to the property other than storm water into a sanitary sewer system?	Yes (No) Unknown

Initials: _____

Date: 12/12/24

ENVIRONMENTAL OWNER QUESTIONNAIRE

Site Address: APNs 074-452-01, 074-103-01, 074-103-05, and 074-451-20, Washoe County, NV

	QUESTION: IF "YES" IS ANSWERED, PLEASE PROVIDE A WRITTEN EXPLANATION IN THE SPACE BELOW THE QUESTION.	ANSWER
19.	To the best of your knowledge, have any *hazardous substances* or *petroleum products*, unidentified waste materials, tires, automotive or industrial batteries or any other waste materials been dumped above grade, buried and/or burned on the *property*?	Yes (No) Unknown
20.	Is there a transformer, capacitor, or any hydraulic equipment for which there are any records indicating the presence of PCB's on the *property*?	Yes (No) Unknown
21.	To the best of your knowledge, have there been previous fires on *property* or adjoining properties that required emergency response activities?	Yes (No) Unknown
22.	Is the *property* equipped with a fire suppression system that uses a source other than water (i.e. chemical or foaming agents, inert gases, etc.)?	Yes (No) Unknown

Printed Name: Raymond Boff

Title: Partner / Owner

Company/Entity: RBK - Industries LLC

Signature: [signature]

Date: 12/12/24

Initials: RB

Date: 12/12/24

RESUMES

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LEO KARCZ, EIT

STAFF ENGINEER

Leo Karcz is an Environmental Engineer with two years of environmental consulting experience. His areas of expertise include Phase I and Phase II environmental site assessments (ESAs), soil and groundwater remediation, and Spill Prevention and Countermeasures Control Plans (SPCCs). Leo's responsibilities have included comprehensive work plan and report preparation, regulatory liaison, regulatory reporting, permit preparation. His field activities include environmental media sampling, drilling oversight, and excavation oversight.

EDUCATION

BS, Environmental Engineering, Colorado State University

YEARS OF EXPERIENCE

5

LICENSES & CERTIFICATIONS

Engineer in Training (EIT)

OSHA HAZWOPER 40-hour

PROJECT EXPERIENCE

PHASE I ENVIRONMENTAL SITE ASSESSMENTS AND TRANSACTION SCREEN ASSESSMENTS

VARIOUS LOCATIONS, NV

As a Staff Engineer Leo has been responsible for conducting various Phase I ESAs in Nevada. Properties assessed include: undeveloped and vacant land, gasoline and automotive service stations, dry cleaning facilities, residential properties, agricultural land, industrial and manufacturing facilities, and office/retail sites. His projects have included coordination with city, county, state, and federal agencies, as well as property owners, land managers, tenants/occupants, and other parties. He has conducted assessments following accepted consulting practices and in accordance with applicable ASTM International Standards 1527 or 2247, the EPA's All Appropriate Inquiry (AAI) ruling, and individual client scopes including Vapor Encroachment Screening and Business Environmental Risks evaluation for asbestos, lead paint, radon, and mold.

PHASE II LIMITED SITE INVESTIGATIONS

VARIOUS LOCATIONS, NV AND CA

As a Staff Engineer Leo has been responsible for conducting environmental media sampling of commercial properties and private land in Nevada and California to assess for the presence of contamination in soil and/or groundwater. His projects include evaluation of petroleum releases associated with underground storage tanks, dry cleaning chemicals, and residual contamination from historic use of pesticides, herbicides, fertilizers, and other chemicals of concern. Leo has been responsible for the identification of contaminant delineation and preparing a report of findings following review of analytical results.

LEO KARCZ, EIT

STAFF ENGINEER, RESUME CONTINUED

PROJECT EXPERIENCE

WATER QUALITY MONITORING

VARIOUS LOCATIONS, CA

As an Environmental Engineer Leo has been responsible for conducting on-site groundwater monitoring well sampling for Phase II ESA investigations and on-going remediation projects in California. He is responsible for collecting quarterly groundwater samples for permit compliance and report preparation for former or current diesel and gasoline stations. Other tasks Leo completes is collecting quarterly water discharge samples for permit compliance and report preparation for remediation systems of former Leaking Underground Storage Tanks (UST).

SPCC, VARIOUS LOCATIONS

Leo was the Environmental Engineer responsible for conducting oil containing devices check inspections for various commercial and industrial facilities. Inspections range from limited surveys in preparation for renovations or in response to losses, as well as comprehensive five-year review. Responsibilities include site visits noting all oil containing devices, secondary containment, determining a spill's flow direction, and making sure all spill kits were in the proper location, and report preparation for a Project Engineer to review.

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ANNA HENRY, EI, CEM

ENVIRONMENTAL PROJECT ENGINEER

Anna Henry is an Environmental Project Engineer with six years of environmental consulting experience. Her areas of expertise include Phase I and Phase II environmental site assessments (ESAs), remediation of regulated wastes in soil and groundwater, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) site documentation and remediation, and characterization and management of non-hazardous and regulated wastes. Anna's responsibilities have included comprehensive work plan and report preparation, regulatory liaison, regulatory reporting, permit preparation, as well as field activities, including environmental media sampling, drilling oversight, and excavation oversight.

EDUCATION

BS, Environmental Engineering, University of Nevada, Reno

YEARS OF EXPERIENCE

6

LICENSES & CERTIFICATIONS

Engineer Intern (EI), NV No. 0T8508

Certified Environmental Manager, NV No. 2497

OSHA

- HAZWOPER 40-hour
- 8-hour Annual Refresher

MSHA Part 48, New Miner Training

PROJECT EXPERIENCE

CITY OF RENO BROWNFIELDS CONTRACT, RENO, NV

Anna is the Quality Assurance Project Manager for this contract and is responsible reviewing all documentation and reports associated with the grant program including Phase I and Phase IIESAs, quarterly and annual reports, and AAI Reporting Checklists.

NDEP BROWNFIELDS CONTRACT

VARIOUS LOCATIONS, NV

Anna is the Phase I ESA Project Manager for this contract. McGinley/ UES is providing NBP consulting services that include Phase I & II ESAs, preparation of remediation of soil and groundwater, groundwater monitoring, landfill assessment, abandoned mine soil and groundwater assessment, asbestos surveys (demolition and renovation), LBP surveys, hazardous materials abatement oversight and clearance, indoor air quality (IAQ) assessments, and PCB assessment and cleanup.

PHASE I ENVIRONMENTAL SITE ASSESSMENTS

VARIOUS LOCATIONS, NV, CA, AZ

Anna served as the Project Manager responsible for conducting various Phase I ESAs in Nevada. Properties assessed have included undeveloped and vacant land, gasoline and automotive service stations, dry cleaning facilities, residential properties, agricultural land, historic and active mining facilities, industrial and manufacturing facilities, and office/retail sites. Assessments were conducted following accepted consulting practices and in accordance with applicable ASTM International Standards 1527 or 2247 and the EPA's All Appropriate Inquiry (AAI) ruling.

PHASE II LIMITED SITE INVESTIGATIONS

VARIOUS LOCATIONS, NV, CA

Anna served as the Project Engineer responsible for conducting environmental media sampling of commercial properties and private land in Nevada and California to assess for the presence of contamination in soil, soil vapor, and/or groundwater. Projects have included evaluation

ANNA HENRY, EI, CEM

ENVIRONMENTAL PROJECT ENGINEER, RESUME CONTINUED, RESUME CONTINUED

PROJECT EXPERIENCE

of petroleum releases associated with underground storage tanks, dry cleaning chemicals, and residual contamination from historic use of pesticides, herbicides, fertilizers, and other chemicals of concern. She was responsible for preparing a comprehensive work plan, executing the Phase II ESAs including drilling oversight, soil, and groundwater sample collection, on-site geological classification of soils, regulator and client liaison, and preparing the report, and planning for further investigation activities.

CLEAN HARBORS

VARIOUS LOCATIONS, NV

Anna served as the Staff Engineer. She was responsible for all aspects of spill response and remediation including coordinating with regulators and clients, directing contractors, conducting samplings, and preparing reports for submittal to NDEP.

DAYTON AGGREGATE PIT, RENO, NV

Anna served as the Staff Engineer. She was responsible for writing and executing a Sampling and Analysis Plan (SAP) to characterize a 24-acre aggregate pit for potential mercury contamination utilizing the ISM approach with DOE Visual Sample Plan (VSP) statistical verification of collected data and sampling strategy.

MONO COUNTY - LANDFILL CLOSURE GROUNDWATER MONITORING PROGRAM

MONO COUNTY, CA

Anna served as the Staff Engineer. She was responsible for executing groundwater sampling at six landfills using multiple sampling methods, analyzing and interpreting data, conducting statistical analysis on large data sets, and preparing semi-annual reports.

GROUNDWATER MONITORING PROJECTS

VARIOUS LOCATIONS, NV AND CA

Anna served as the Staff Engineer. She was responsible for preparing quarterly groundwater monitoring and/or remediation system reports for over 20 active sites associated with petroleum and/or solvent plumes, performing statistical trend analysis, interpreting data, and liaising with clients and regulatory agencies.

EXPLOSIVE MANUFACTURING AND TESTING FACILITY, LOCKWOOD, NV

Anna served as the Project Engineer for a large-scale characterization of a former explosive manufacturing and testing facility as part of a property transaction. Activities included several site visits and a review of historical records. These were used to design a Phase II assessment to characterize areas where releases, disposal, and/or migration of hazardous substances occurred. The Phase II investigation activities included preparing a safety plan, subsurface drilling, analytical sample of surface explosive residue, soil, groundwater, and surface water, and follow-up reporting with demolition and decontamination planning.

LIMITATIONS

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PHASE I ENVIRONMENTAL SITE ASSESSMENT
LIMITATIONS OF REPORT

1. This Phase I Environmental Site Assessment (ESA) report (Report) has been prepared on behalf of and for the exclusive use of the addressee, solely for use in a Phase I ESA of the subject property. This report and the findings contained herein shall not, in whole or in part, be disseminated or conveyed to any other party, nor used by any other party in whole or in part, without the prior written consent of UES. Unless other contractual agreements were made, the services described in this report were carried out in accordance with the General Conditions/Terms which accompanied the proposal.

2. This Phase I ESA was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same geographical area, and UES endeavored to observe that degree of care and skill ordinarily exercised by other consultants under similar circumstances and conditions. The findings and conclusions stated herein must be considered not as scientific certainties, but rather as professional opinions concerning the significance of the limited data gathered during the course of the Phase I ESA. UES does not and cannot represent that the subject property contains no hazardous waste or material, petroleum products, or other latent condition beyond that observed by UES during its assessment activities as defined in the ASTM E1527-21 standard.

3. The conclusions presented in the Report were based solely upon the services described therein, and not on scientific tasks or procedures beyond the scope of described services or the time and budgetary constraints imposed by Client. Furthermore, such conclusions are based solely on subject property conditions, and rules and regulations, which were in effect at the time of the Phase I ESA.

4. In preparing this Report, UES has relied on certain information provided by state and local officials and other parties referenced therein, and on information contained in the files of state and/or local agencies available to UES at the time of the Phase I ESA research. Although there may have been some degree of overlap in the information provided by these various sources, an attempt to independently verify the accuracy or completeness of all information reviewed or received during the course of this Phase I ESA was not made.

5. It is recommended that UES be retained to provide further services during construction and/or implementation of any remedial measures recommended in this Report. This is to allow UES to observe compliance with the findings and recommendations (if applicable) contained herein, and to allow the development of design changes in the event that subsurface conditions differ from those anticipated.

6. In the event that information is developed relative to environmental issues at the subject property and not contained in this Report, such information shall be brought to UES' attention. UES will evaluate such information and, on the basis of this evaluation, may modify the conclusions stated in this Report.

7. Observations were made of the subject property and of structures on the subject property as indicated within the Report. Where access to portions of the subject property or to structures on the subject property was unavailable or limited, UES renders no opinion as to the presence of hazardous substances and/or petroleum products, or to the presence of indirect evidence relating to hazardous substances and/or petroleum products in that portion of the subject property or subject property structure. In addition, UES renders no opinion as to the presence of hazardous substances, hazardous waste or material, oil or other petroleum products or to the presence of indirect evidence relating to hazardous substances, hazardous material, oil, or petroleum products where direct observation of the interior walls, floor, roof, or ceiling of a structure on a subject property was obstructed by objects or coverings on or over these surfaces.

8. Unless otherwise specified in the Report, UES did not conduct an audit for regulatory compliance or perform testing or analyses to determine the presence or compliance with activity and use limitations (AULs), asbestos-containing materials, radon, lead or heavy metals-based paint, lead in drinking water, mold, methane, indoor air quality, wetlands and other Waters of the U.S., regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor vapor intrusion potential, biological agents, formaldehyde, and high voltage power lines.

Appendix B- Biological Assessment Report

BIOLOGICAL RESOURCE ASSESSMENT

NVSolarWRX Solar Energy Production Project
Washoe County, NV

Prepared for:
Robert Simmons
NVSolarWRX

Prepared By:
Universal Engineering Sciences
3050 Industrial Boulevard
West Sacramento, CA 95691

July 25, 2025

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1.0 INTRODUCTION

1.1 PURPOSE AND OVERVIEW

The purpose of this biological resource assessment is to document the biological resources of Phase 1 of the NVSolarWRX Solar Energy Production Project also sometime referred as "Simmons" in this report ("Project") located on approximately 1,692 acres in the Honey Lake Valley, Washoe County Nevada and to assess the potential for project implementation to affect biological resources. This survey included land surrounding the 1,692-acre Project Site for a total area of survey of 2,158 acres. The Project is intended to provide renewable energy generation and storage for greater capacity and service reliability to the existing electric grid transmission and distribution line systems in the region. Overall, with a potential Project footprint of 1,692 acres, the Project property (the "Property"), consists of (1) 4 adjoining parcels totaling approximately 1,680 acres – known as Washoe County Assessor's Parcel Numbers 074-103-01, 074-103-05, 074-451-20, and 074-452-01; and (2) 7 linear miles (approximately 12 acres) of an [existing] private access and utility easement – specifically, within the Truckee Meadows Regional Planning Agency's designated Rainbow Way 345 kV Regional Utility Corridor – extending west from the Property two miles to Rainbow Way and continuing five miles south along Rainbow Way to the Fort Sage Substation (the "Gen-Tie Corridor"). The Project will have an estimated capacity of the final Photovoltaic Solar Energy System ("PSES") of 450 megawatts (MW), the Project will also require a 345 kV generation tie (gen-tie) line to provide interconnection with the NV Energy Fort Sage Substation (Previously Approved for Praana Renewable Energy and Shreem Brezee Solar, LLC-Sunseeker Solar Project).

Specifically, this document addresses any potential impacts to federally listed threatened or endangered species, federal and state special-status species and describes the onsite vegetation communities and identifies any potential jurisdictional waters of the U.S, including wetlands that may be adversely affected by construction, operation, or maintenance of the Project; and to describe impact avoidance and minimization measures that would reduce or avoid potential adverse Project effects to these species and their habitats.

This assessment has been prepared according to the legal requirements set forth under Section 7 of the Federal Endangered Species Act (FESA) (16 U.S.C. 1536 [c], C.F.R. Sec. 402.12), and presents technical information upon which later determinations regarding project effects will be developed for compliance with the 1971 Utility Environmental Protection Act (UEPA) of Nevada found in the Nevada Revised Statutes (NRS). UEPA permits are addressed in NRS 704.820 through 704.900, and NAC 703.415 through 703.427.

1.2 PROJECT LOCATION AND ENVIRONMENTAL SETTING

The Project area includes the easement of Rainbow Way (gen-tie) from the NV Energy Fort Sage Substation to the NVSolarWRX Project area and the full extent of additional land that may be directly or indirectly affected by Project construction. The Project is located within the southeastern portion of Honey Lake Valley in western Nevada (Figure 1). To delineate the Project area, local topography, hydrology, special-status species populations, and potential Project effects were considered. The topography of the Project area is relatively flat with a slope of less than five (5%) percent for all Project areas. A portion of Dead Cow Lake is the primary ephemeral water feature in the Project area (Figure 2).

2.0 REGULATORY FRAMEWORK

2.1 FEDERAL

2.1.1 Endangered Species Act

The United States Congress passed the Endangered Species Act (ESA) in 1973 to protect species that are endangered or threatened with extinction. The ESA is intended to operate in conjunction with the National Environmental Policy Act (NEPA) to help protect the ecosystems upon which endangered and threatened species depend.

Under the ESA, species may be listed as either "endangered" or "threatened". Endangered means a species is in danger of extinction throughout all or a significant portion of its range. Threatened means a species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range. All species of plants and animals, except non-native species and pest insects, are eligible for listing as endangered or threatened. The USFWS also maintains a list of "candidate" species. Candidate species are species for which there is enough information to warrant proposing them for listing, but that have not yet been proposed. "Proposed" species are those that have been proposed for listing but have not yet been listed.

The ESA makes it unlawful to "take" a listed animal without a permit. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." Through regulations, the term "harm" is defined as "an act which actually kills or injures wildlife". Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering."

2.1.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA; 16 USC §703) prohibits the killing of migratory birds or the destruction of their occupied nests and eggs except in accordance with regulations prescribed by

the USFWS. The bird species covered by the MBTA includes nearly all of those that breed in North America, excluding introduced (i.e., exotic) species (50 Code of Federal Regulations §10.13). Activities that involve the removal of vegetation including trees, shrubs, grasses, and forbs or ground disturbance have the potential to affect bird species protected by the MBTA. Thus, vegetation removal and ground disturbance in areas with breeding birds should be conducted outside of the breeding season (February 1 - August 31). If vegetation removal or ground disturbance activities are conducted during the breeding season, then a qualified biologist must determine if there are any nests of bird species protected under the MBTA present in the construction area prior to commencement of construction.

If active nests are located or presumed present, then appropriate avoidance measures (e.g., spatial or temporal buffers) must be implemented.

2.1.3 Clean Water Act

The United States Army Corps of Engineers (USACE) and the United States Environmental Protection Agency (USEPA) regulates the discharge of dredged or fill material into waters of the U.S., including wetlands, under Sections 10 and 404 of the federal Clean Water Act (CWA). The USACE has established a series of nationwide permits (NWPs) that authorize certain activities in waters of the United States, if a proposed activity can demonstrate compliance with standard conditions. Normally, the USACE requires an individual permit (IP) for an activity that will affect (fill or otherwise remove) an area in excess of 0.5-acre of waters of the United States. Projects that result in impacts less than 0.5 acre can typically be conducted pursuant to one of the nationwide permits, if they are consistent with the standard permit conditions. The USACE also has discretionary authority to require an environmental document (e.g. Environmental Impact Statement (EIS) or Environmental Assessment (EA) for projects that result in impacts to an area between 0.1 and 0.5 acre and above 0.5-acre.

Waters of the U.S. include wetlands, lakes, rivers, streams, and their tributaries. Wetlands that fall under the jurisdiction of the USACE (referred to as jurisdictional wetlands) are defined as areas "inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions." Areas not considered jurisdictional waters include, for example, non-tidal drainage and irrigation ditches excavated on dry land; artificially irrigated or created bodies such as small ponds, lakes or swimming pools; and water-filled depressions (33 CFR 328.3; 40 CFR 230.3).

Project proponents must obtain a permit from USACE for all discharges of fill material into waters of the U.S., including jurisdictional wetlands, before proceeding with a proposed action. If

wetlands are jurisdictional and could be filled as part of the project, USACE may issue either an individual permit or a general permit. Individual permits are prepared on a project-specific basis for projects that are expected to have adverse effects on the aquatic environment. General permits are pre-authorized permits issued to cover similar activities that are expected to cause only minimal individual and cumulative adverse environmental effects.

A Section 404 permit may not be required if the project avoids the discharge of any fill material into waters of the U.S., including wetlands. If the project cannot be designed to avoid the discharge of fill or excavating in waters of the U.S., including wetlands, a Section 404 permit must be obtained.

The CWA requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the U.S. to obtain a certification that the discharge will comply with the applicable effluent limitations and water quality standards. If a permit under Section 404 of the CWA is required from the USACE then a Section 401 Water Quality Certification (WQC) from the Nevada Division of Environmental Protection (NDEP) is also required.

2.2 STATE OF NEVADA

2.2.1 Nevada Administrative Codes 503.030; 503.050, and 503.060

The Nevada Administrative Code (NAC) 503.030 protects threatened, and sensitive mammals, NAC 503.050 birds, and NAC 503.060 fish. Specific lists of mammals, birds, and fish are established and identified within the NAC.

2.2.2 Nevada Administrative Codes 527.010; 503.0935 and Nevada Revised Statutes 527.270

The NAC 527.010 lists fully protected species of native flora. The NAC 503.0935 also prescribes special permits for handling, moving, or temporarily possessing protected wildlife. The Nevada Revised Statutes (NRS) 527.270 list of fully protected species declared to be threatened with extinction establishes the requirements and information needed for the application for the special permits required for removal.

2.2.3 Nevada Administrative Code 527.200 Nevada Natural Heritage Program

This NAC defines the responsibilities of the Nevada Natural Heritage Program which includes establishing and maintaining a committee of qualified professionals to conduct scientific research and analysis of native flora; maintain data and records related thereto; and provide assistance to the State Forester in the development and administration of a program for the conservation, protection, restoration and propagation of critically endangered species of native flora. It is the

responsibility of the Nevada Natural Heritage Program to determine if the existence of a species or subspecies of native flora is endangered and if the survival of that species or subspecies requires assistance because of overexploitation, disease or other factors, or because the habitat of the native flora is threatened with destruction, drastic modification or curtailment. The Nevada Natural Heritage Program in consultation with the State Forester will recommend that the species or subspecies of native flora be placed on the list of fully protected species of native flora in the state of Nevada.

2.2.4 Washoe County Master Plan

2.2.4.1 High Desert Area Plan

The Project is located within the High Desert Area Plan of the Washoe County Master Plan, which is composed of a number of unique habitats that provide for a diverse population of wildlife and plants. Mule deer, pronghorn antelope, California bighorn sheep, and wild horses can be found in this region. The federal list of threatened and endangered species indicates that the endangered Peregrine falcon and Southern bald eagle occur in the High Desert Area Plan, planning area as well.

Wildlife habitat and migratory routes are a key component of the area's character. In 2006, The Nevada Natural Heritage Program ranked Wall Canyon and Fly Geyser as "Highest Priority Conservation Sites." These sites are characterized as currently requiring protection in order to conserve a significant assemblage of at-risk species and to prevent the loss of one or more species in the immediate future. Due to the High Desert's sensitive environmental conditions, it is essential to protect the natural balance that has evolved in the area over time. Careful stewardship of this rich natural environment is fundamental to maintaining and preserving this valuable component of the High Desert area character.

The High Desert Area Plan calls for new development to respect the value of wildlife and wildlife habitat. Goal HD.12.2 states: "Any development that has the potential to negatively impact an established wildlife migration route or critical habitat, including but not limited to traditional mule deer migration routes, deer winter range, federally classified Threatened and Endangered Species and their associated habitat must demonstrate how that project will protect the integrity of the migration route or habitat." Goal 19 requires that all wetlands and their associated habitats be addressed. Goal HD 19.1 states: "All development will meet or exceed the standards for wetland development and impact established by state and federal agencies responsible for wetlands management." Goal HD 19.3 states: "Development proposals that impact any area designated "potential wetlands" on the Development Suitability map must conduct a wetlands delineation study and obtain Army Corps of Engineers certification of the proposed wetlands and comply with vector-borne diseases regulations."

Conservation Element

NRS Chapter 278.160 requires a conservation plan as part of any adopted master plan for counties with a population of more than 100,000 but less than 400,000, as is the case in Washoe County. The Project and the Gen-Tie Line corridor are subject to the Washoe County Master Plan – Conservation Element. The Conservation Element of the Washoe County Master Plan serves as the conservation "plan" for unincorporated Washoe County and outlines policies and action programs for the conservation and preservation of natural resources. The plan also provides guidance to the Washoe County Planning Commission and the Washoe County Board of County Commissioners regarding their efforts to conserve natural resources while balancing the interests of growth and development. The Conservation Element was first adopted in 1991 and was comprehensively updated in 2008. It should be noted that several different planning documents, agencies, and regulations (including federal, state, and local) are often used to address or implement the required contents of a conservation plan cited in NRS 278.160.

The Project must demonstrate compliance with the goals of the Conservation Element which include:

- C.3.1 The Washoe County Department of Community Development shall adequately consult with other agencies while maintaining Development Suitability maps that depict valuable and/or critical land, water and wildlife resources or features which shall include, but not be limited to, the following: Key wildlife habitats and migration routes; Perennial and intermittent streams and wetlands.
- C.11.4 Washoe County will encourage the development of active solar energy collection and production infrastructure.
- C.13.1 Protect key wildlife habitats; habitats of threatened, endangered or rare species; and key migration routes.
- C.13.2 Promote the conservation and enhancement of fishery and wildlife resources; areas of high wildlife value; areas necessary for the protection and perpetuation of rare, endangered and threatened species; and areas important for scientific study.
- C.13.3 Ensure that all existing natural streams, playas and other water bodies are recognized for their wildlife habitat, floodway, water quality enhancement and scenic value. The Conservation Element identifies the Nevada Natural Heritage Program, and five plant species in Washoe County that are identified for Nevada state protection.

3.0 METHODS

3.1 LITERATURE AND DATA REVIEW

The literature review provides a baseline from which to evaluate the biological resources potentially occurring on the Project site and gen-tie as well as the surrounding area. As part of the literature review, we examined existing environmental documentation for the local vicinity and drew upon professional knowledge of the area having completed similar projects in the past.

3.1.1 Special-Status Species

Special-status species lists from the USFWS (including Information for Planning and Conservation [IPaC] was developed and provided a list of Federally protected plants, wildlife, and critical habitat for the limits of the proposed Project area), Nevada Division of Natural Heritage Program (NDNH), and Nevada Department of Wildlife (NDOW) were referenced to compile a master list of special-status and sensitive species that could potentially occur in the Project area.

Aerial photography and geographic information system (GIS) maps were then used to assess the potential for sensitive habitats in the Project area. Special-status species that were considered include all federally listed threatened and endangered species, candidates for listing, species proposed for listing, and species of concern.

A special-status species was considered to potentially occur if its known geographical distribution overlapped with the Project area and its general habitat requirements (e.g., roosting, nesting, or foraging habitat; specific soil type; permanent water source) were present. The habitat requirements of each species were considered during reconnaissance field survey and habitat assessments. The list of special-status plant species was utilized to organize and plan for blooming focused surveys in the 2025 blooming season.

3.1.2 Waters of the U.S. (Aquatic Resources)

Prior to conducting the field survey, we reviewed USGS topographic maps and aerial photography to identify any potential natural drainage features, water bodies and/or wetlands. Recent satellite imagery from Google Earth was also used to identify whether there were any wetlands, washes, or drainages that may potentially be jurisdictional aquatic resources. This review specifically looked for indicators of wetness including defined channels, dense vegetation, change in vegetation or site characteristics, or changes in slope. Staff also reviewed the National Wetlands Inventory (NWI) mapping for indicators of hydrology and flow and verified these findings through field observation. To determine the presence or absence of hydric soils, UES reviewed the US Department of Agriculture's (USDA) Web Soil mapping to identify the presence of hydric soils within the Project site and associated gen-tie line alignment.

3.1.3 Soils

The literature review included the United States Department of Agriculture (USDA) Soil Survey for the Project area and the current USGS 7.5-minute topographic quadrangle maps and recently flown aerial photographs as a preliminary analysis of the existing conditions within the Project area and immediate vicinity. Information obtained from the review of the topographic maps included elevation range, general watershed information, and potential drainage feature locations. Aerial photographs provided a perspective of the most current site conditions relative to onsite and offsite land use and plant community locations.

3.2 Field Survey

A reconnaissance field survey was conducted by UES biologists Brian Mayerle and Tessa Behnke on October 24, 2024, and involved 100% search coverage of the Phase 1 Project site and gen-tie alignment. The survey included an assessment of general biological site conditions, including vegetation and identification of potentially suitable habitats for listed plant and wildlife species. Any special-status or other sensitive biological resources identified during the review were verified during the field survey to ensure accuracy. Special attention was paid to sensitive habitats and areas potentially supporting special-status floral and faunal species. Additional parameters of investigation included general habitat, soil conditions, presence of indicator species, slope, aspect, and hydrology.

Common plant species observed during surveys were identified by visual characteristics and morphology in the field and recorded in a field notebook. Uncommon and less-familiar plants were identified off-site with the use of taxonomical guides. Vegetation communities and boundaries were noted on current aerial photography and through field observation. Plant communities and habitat types were mapped on the Project site using data from the 2020 Landfire dataset, supplemented by field assessment.

Wildlife species detected during the survey by sight, calls, tracks, scat, or other signs were recorded in a field notebook. Notations were made regarding suitable habitat for those special-status species determined to potentially occur within the Project site. Appropriate field guides were used to assist with species identification during surveys, such as Peterson (2010), Reid (2006), and Stebbins (2003).

4.0 RESULTS

4.1 Vegetation

Vegetation in the Project area (Phase 1 Project site and gen-tie) is typical of the Basin and Range and the Terrestrial Natural Communities of Nevada, which include Intermountain Basins: Playa

(970.02 acres), Greasewood Flat (552.35 acres), Mixed Salt Desert Scrub (1.67 acres), Wash (0.98-acre), Big Sagebrush Shrubland (0.84-acre), and Montane Sagebrush Steppe (0.13-acre). Great Basin and Intermountain Ruderal Shrubland (179.53 acres), Interior Western North American Temperate Ruderal Shrubland (10.96 acres) and Great Basin and Intermountain Introduced Grassland/Forbland (19.72 acres) constitute the remainder of vegetation overall (Figure 3).

4.1.1 Intermountain Basins Playa

This vegetation classification type covers approximately 970.02 acres, 959.28 of which is on the Project site and 10.74 in the gen-tie corridor. It is the dominant land cover type on the site, with a significant portion comprised of Dead Horse Lake. This cover type is composed of barren and sparsely vegetated playas (generally <10% plant cover). Salt crusts are common throughout this vegetation type, with small saltgrass beds in depressions and sparse shrubs around the margins. These areas are intermittently flooded and water is prevented from percolating through the soil by an impermeable soil sub horizon and is left to evaporate. Soil salinity varies greatly with soil moisture and greatly affects species composition. Characteristic species may include iodine bush (*Allenrolfea occidentalis*), greasewood, spiny hopsage, Lemmon's alkaligrass (*Puccinellia lemmonii*), Great Basin (*Leymus cinereus*), saltgrass, and saltbush. Intermountain Basin Playas are mostly found within the Project site. Ground truthing confirmed that this habitat type is dispersed throughout the Project site and gen-tie corridor.

4.1.2 Intermountain Basins Greasewood Flat

This vegetation type covers approximately 552.35 acres, 522.11 of which is on the Project site and 30.24 in the gen-tie corridor. This type typically occurs near drainages on stream terraces and flats or may form rings around more sparsely vegetated playas. Sites typically have saline soils, a shallow water table and flood intermittently, but remain dry for most growing seasons. The water table remains high enough to maintain vegetation, despite salt accumulations. These areas usually occur as a mosaic of multiple communities, with open to moderately dense shrublands dominated or co-dominated by greasewood (*Sarcobatus vermiculatus*). Fourwing saltbush (*Atriplex canescens*), shadscale (*Atriplex confertifolia*), and/or winterfat (*Krascheninnikovia lanata*) may also be present or co-dominant with greasewood. Occurrences are often surrounded by mixed salt desert scrub. The herbaceous layer, if present, is usually dominated by grasses such as alkali sacaton (*Sporobolus airoides*) and saltgrass (*Distichlis spicata*). Herbaceous species such as spikerush (*Eleocharis palustris*) may also occur. Intermountain Basins Greasewood Flat is the dominant vegetated cover on the site. Biologists confirmed this during surveys, finding that the habitat is dominated by greasewood, which is intermixed with shadscale and spiny hopsage (*Grayia spinosa*). The understory is dominated by clasping pepperweed (*Lepidium perfoliatum*) with occasional sporadic annual invasive grasses. The habitat is a mosaic of the shrub/grassland

vegetation type and dry alkali playa. Shrubs and grasses persist in small rises in topography above the playas. Again, ground truthing confirmed that this habitat type is dispersed throughout the Project site and gen-tie corridor.

4.1.3 Intermountain Basins Mixed Salt Desert Scrub

This vegetation type covers approximately 1.67 acres, 1.35 of which is on the Project site and 0.31-acre in the gen-tie corridor. This vegetation type occurs in saline basins, alluvial slopes and plains. Soils are generally saline, calcareous, alkaline, and medium- to fine-textured. The plant community is characterized as an open to moderately dense shrubland composed of saltbush (*Atriplex* spp.) species. Other shrubs present to codominant may include big sagebrush (*Artemisia tridentata*), rubber rabbitbrush (*Ericameria nauseosa*), Nevada ephedra (*Ephedra nevadensis*), spiny hopsage, winterfat, desert thorn (*Lycium* sp.), bud sagebrush (*Picrothamnus desertorum*), or horsebrush (*Tetradymia* sp.). The sparse to moderately dense herbaceous layer is dominated by perennial grasses such as Indian ricegrass (*Achnatherum hymenoides*), blue grama (*Bouteloua gracilis*), thickspike wheatgrass (*Elymus lanceolatus* ssp. *lanceolatus*), western wheatgrass (*Pascopyrum smithii*), James' galleta (*Pleuraphis jamesii*), big galleta (*Pleuraphis rigida*), Sandberg bluegrass (*Poa secunda*), and Alkali sacaton. The Landfire data suggested that the Intermountain Basins Mixed Salt Desert Scrub habitat was dispersed throughout the northern portion of the Project site.

4.1.4 Intermountain Basins Wash

This vegetation classification type covers approximately 0.98-acre, 0.80-acre of which is on the Project site and 0.18-acre is in the gen-tie corridor. These features are mostly unvegetated and are tributaries to Dead Horse Lake, which is a portion of the Project site.

4.1.5 Intermountain Basins Big Sagebrush Shrubland

This vegetation classification type covers approximately 0.84-acre, the entirety of which is in the gen-tie corridor. This vegetation type is generally dominated by big sagebrush (*Artemisia tridentata*), with associated species such as yellow and rubber rabbitbrush, spiny hopsage, winterfat, desert thorn, and horsebrush. Landfire indicates this vegetation type occurring at the central and south end of the gen-tie alignment.

4.1.6 Intermountain Basins Montane Sagebrush Steppe

This vegetation classification type covers approximately 0.13-acre, the entirety of which is in the gen-tie corridor. This vegetation type occurs at higher elevations than big sagebrush shrubland, but is generally dominated by big sagebrush (*Artemisia tridentata*). Associated species such as yellow and rubber rabbitbrush, spiny hopsage, winterfat, desert thorn, and horsebrush. Landfire indicates this vegetation type occurring at the south end of the gen-tie alignment.

4.1.7 Great Basin and Intermountain Ruderal Shrubland

This vegetation type covers approximately 179.53 acres, 153.2 of which is on the Project site and 26.32-acre in the gen-tie corridor. Similar to big sagebrush shrubland, this vegetation type occurs on alluvial slopes and plains and supports ruderal (weedy) species as well as native shrubs and forbs. Introduced species include herbaceous species such as halogeton (*Halogeton glomeratus*), kochia (*Kochia scoparia*), saltwort (*Salsola* sp.), Native species such as blue grama (*Bouteloua gracilis*), thickspike wheatgrass (*Elymus lanceolatus* ssp. *lanceolatus*), western wheatgrass (*Pascopyrum smithii*), James' galleta (*Pleuraphis jamesii*), big galleta (*Pleuraphis rigida*), and Sandberg bluegrass (*Poa secunda*). The Landfire data suggested that this vegetation type is dispersed throughout the central portion of the Project site and gen-tie.

4.1.8 Great Basin and Intermountain Introduced Grassland/Forbland

This vegetation type covers approximately 19.72 acres, 17.42 of which is on the Project site and 2.3 acres in the gen-tie corridor. Similar to the above-described vegetation type, this type has similar introduced herbaceous species, but lacks shrub species. A community type resulting from poor land use practices and increased disturbance regimes is dominated by introduced annual and/or biennial herbaceous species such as halogeton, kochia, saltwort and other non-natives. The Landfire data suggested that this vegetation type is dispersed throughout the central portion of the Project site and gen-tie.

4.1.9 Interior Western North American Temperate Ruderal Shrubland

This vegetation type covers approximately 10.96 acres, 6.93 of which is on the Project site and 4.03 acres in the gen-tie corridor. Similar to the above-described vegetation type, this type has similar introduced herbaceous species, but lacks shrub species. A community type resulting from poor land use practices and increased disturbance regimes is dominated by introduced annual and/or biennial herbaceous species such as halogeton, kochia, saltwort and other non-natives. The Landfire data suggested that this vegetation type is dispersed throughout the central portion of the Project site and gen-tie.

4.2 WILDLIFE

The vegetation types discussed above support habitat for numerous wildlife species typical of the these habitats in the region. Avian species observed or expected to occur within the Project area include sage thrasher (*Oreoscoptes montanus*), horned lark (*Eremophila alpestris*), common raven (*Corvus corax*), prairie falcon (*Falco mexicanus*), great horned owl (*Bubo virginianus*), and red-tailed hawk (*Buteo jamaicensis*). Mammals including pronghorn (*Antilocapra americana*), mountain lion (*Puma concolor*), bobcat (*Lynx rufus*), coyote (*Canis latrans*), black-tailed jack rabbit (*Lepus californicus*) also occur. Great basin rattlesnake (*Crotalus lutosus*) and sagebrush lizard (*Sceloporus graciosus*) are reptiles that would also occur.

4.3 SPECIAL-STATIUS SPECIES

4.3.1 Plants

Special-status plant species are those considered rare, threatened, or endangered by the USFWS and the NDNHP. Based on the literature review and field reconnaissance, no Nevada protected plant species were identified as expected to occur within the Project area. The reconnaissance survey was conducted at the appropriate time of year for definitive identification and no special-status plant species were identified.

4.3.2 Wildlife

No special-status wildlife species were found in the Project area or gen-tie alignment. The Carson wandering skipper (*Pseudocopaeodes eunus obscurus*) is federally listed endangered and has the potential to occur in the Project area, albeit very low potential as this species known populations are very limited to two locations, one is Washoe County and Lassen County in California.

Nevada protected game species (mule deer, pronghorn, bighorn sheep, and greater sage-grouse) were identified by the NDOW as potentially occurring within the region. Moreover, Nevada Wildlife Action Plan (WAP) Species of Concern (SOC) (golden eagle and burrowing owl) were identified by the Nevada Department of Wildlife as potentially occurring within the Project area.

4.3.2.1 Mule Deer

Mule deer (*Odocoileus hemionus*) occupies a variety of habitats, preferring open landscapes. Often found near human development (WAPT 2012, NatureServe 2023), occupied distribution exists within the Project site and gen-tie. Although high quality habitat is not present within the Project area, it may be used for foraging will be able to access alternative surrounding habitat.

4.3.2.2 Pronghorn

Pronghorn antelope (*Antilocapra americana*) occupies a variety of habitats, including deserts, grasslands, and river basins, especially those containing low sagebrush and prefers open landscapes (NDOW 2023, NatureServe 2023). Occupied distribution exists within the region, but is not likely within the Project site. The distribution may cross southern end of the gen-tie line, but the proposed Project is not likely to adversely affect this species. A very limited amount of the Project area falls within the occupied distribution, and individuals who might use this habitat will have access to alternative surrounding habitat.

4.3.2.3 Bighorn sheep

Bighorn sheep (*Ovis canadensis*) occurs throughout Nevada in alpine meadows, mountain slopes, and foothills. Steep rocky slopes are an important feature of habitat as this provides escape terrain to avoid predators (WAPT 2012). Occupied distribution exists within the region, but not within the Project area.

4.3.2.4 Greater sage grouse

Greater sage grouse (*Centrocercus urophasianus*) uses a variety of sagebrush habitats and is often found in close proximity to meadows. Sagebrush overstory and herbaceous understory are critical to this species. Habitat within the Project area has been classified as other, general, and priority habitat by the Nevada Sagebrush Ecosystem Program. Greater sage grouse activity in the region has been documented by 1,275 tracking locations generated by at least 90 radio-marked birds. There is one known sage-grouse lek within the area located at the southern end of the gen-tie line corridor that is currently impacted by vehicular traffic.

4.3.2.5 Golden Eagle

Golden eagle (*Aquila chrysaetos*) found throughout Nevada, occurring in a variety of habitats ranging from arctic to desert, occurs in open country, especially around mountains, hills, and cliffs. In Nevada, this species nests primarily on cliff ledges and occasionally in large trees (WAPT, 2012). The lack of cliff habitat and tall trees within the Project area make it unlikely for golden eagle to use the Project area for nesting. However, nesting birds may be present in the surrounding mountains so it is possible that individuals may use the Project area for foraging or may pass over the Project area.

4.3.2.6 Burrowing Owl

Burrowing owl (*Athene cunicularia*) occupies open habitats with sparse vegetation, such as prairie, pastures, desert, or shrub-steppe. This species occurs throughout Nevada in salt desert scrub, Mojave shrub, and sagebrush habitat, as well as agricultural landscapes. Although not found in the Project area, one nest has been found within the surrounding area. Surveys should be conducted in the spring prior to ground disturbing construction activity to identify and avoid active burrows.

4.4 Waters of the U.S. (Aquatic Resources)

Analysis of satellite imagery indicated small riverine features draining southeast to Dead Horse Lake. In the field, these features do not support any riparian vegetation and terminate at Dead Horse Lake. Open water was observed at the eastern end of the largest feature during field surveys. Indicators of surface hydrology appeared to support an ephemeral flow or inundation regime, however, no hydric soils, hydrophytic vegetation or hydrologic topography was observed.

NWI data identified the following feature classifications within the Project area:

- L2USJ - Lacustrine, Intermittently Flooded, Unconsolidated Shore (422.01 acres)
- PUSJ – Palsturine, Intermittently Flooded, Unconsolidated Shore (160.02 acres)
- PSS1J - Palsturine, Intermittently Flooded, Scrub Shrub (33.23 acres)

Each feature classification within the Project area included the estimated water regime classification of (J) - Intermittently Flooded. This classification is used to describe a feature when the substrate is exposed, but surface water is present for variable periods without detectable seasonal periodicity and weeks, months, or even years may intervene between periods of inundation (Figure 4).

4.5 SOILS

All soil types identified within the Project area were identified as non-hydric or predominantly non-hydric. Soil classifications within the Project area are:

- 610 Haybourne-Mottsville-Incy association (11.3 acres in gen-tie);
- 630 Chappuis sandy loam (11.6 acres in gen-tie);
- Gitakup-Tresed-Ragtown association (1004.9 acres total, with 998.2 onsite and 6.7 acres in the gen-tie);
- 780 Chuckles-Playas complex (16.7 acres total, with 0.8-acre onsite and 15.9 acres in the gen-tie);
- Chuckles-Ragtown-Playas complex (439.9 acres total, with 410.5 onsite and 29.3 acres in the gen-tie), and
- Typic Udorthents, 0-1 percent slopes (257.7 acres on the site).

There were no indicators of prior, current, or potential interstate or foreign commerce on these potential resources. As such no permits under Sections 401 or 404 of the Clean Water Act would be required for development of the Project area. This finding would not obviate the need for other permits under the purview of NDEP such as the Working-in-Waterways/Temporary Discharge permits and Stormwater Construction permit.

5.0 IMPACTS DISCUSSION

Temporary and permanent impacts are described for vegetation/habitats, and wildlife and plant species, including special-status species. Additionally, direct, and indirect impacts are discussed for each species that may be affected by the Project. These types of impacts are described below.

5.1 TEMPORARY IMPACTS

Construction of components of the Project will likely require temporary disturbance of at least 90% of the Project site to install pilings. No grading and a low impact construction method will be implemented for at least 90% of the Project area. Maintenance of Rainbow Way and installation of any power poles within the Rainbow Way PUE will require temporary disturbance to an approximate 40-foot-wide PUE. In certain areas, the PUE may be narrowed to avoid impacts to

sensitive habitats and special-status species. In other areas, additional workspace needs may require that the PUE be expanded temporarily beyond the 40-foot widths. Most of these impacts will be temporary, as the Project plans to restore all disturbed habitats within the Project areas following construction. Temporary impacts resulting from construction activities will be reduced to less than significant levels with the implementation of the avoidance, minimization, and mitigation measures outlined in Section 6.

5.2 PERMANENT IMPACTS

Permanent impacts consist of the construction of an shared electrical substation access/maintenance roads and underground collection cables for electrical collection from the solar panels to the invertors. Permanent impacts that may result from Project construction are only anticipated where the above-described Project improvements (electrical substation and access/maintenance roads) will permanently convert existing habitat. Permanent impacts to special-status species may consist of loss of suitable foraging, nesting, roosting, breeding, aestivation, or hibernation habitat. However, permanent impacts will be reduced to less than significant levels by avoiding location of permanent structures in sensitive habitat to the maximum extent feasible.

5.2.1 Direct Impacts

Direct impacts are defined in the FESA as effects to species or their critical habitat that occur during the implementation of a project. These impacts are likely to result from construction of the Project but are not likely to continue once construction is complete.

5.2.2 Indirect Impacts

Indirect impacts are defined in the FESA as effects that occur to species or their critical habitat after implementation of the Project is complete. These effects are caused by or result from Project activities and are reasonably certain to occur.

5.3 VEGETATION

Intermountain Basins Playa

Temporary Impacts

Assuming a minimum of 90% coverage of this vegetation type, approximately 863.35 acres of the 959.28 total on the Project site will be temporarily impacted with low impact methods. This area will have pilings driven into the ground to support the solar array axis. No clearing or grading of vegetation or the surface will be conducted on this acreage. Any sensitive areas located in these areas, such as locations of special status species, or active burrows and nesting will be avoided, or impacts minimized using the mitigation measures.

Permanent Impacts

The construction of the Project within the gen-tie line (electrical substation and access/maintenance roads will permanently remove approximately 10.74 acres of this vegetation in this area. The Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to this vegetation/habitat type.

Intermountain Basins Greasewood Flat

Temporary Impacts

With 90% coverage of this vegetation type, approximately 469.90 acres of the 522.11 total that is on the Project site will be temporarily impacted with low impact methods. This area will have pilings driven into the ground to support the solar array axis. No clearing or grading of vegetation or the surface will be conducted on this acreage. Any sensitive areas located in these areas, such as locations of special status species, or active burrows and nesting will be avoided, or impacts minimized using the mitigation measures.

Permanent Impacts

The construction of the Project within the gen-tie line (electrical substation and access/maintenance roads will permanently remove approximately 30.24 acres of this vegetation in this area. The Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to this vegetation/habitat type.

Intermountain Basins Mixed Salt Desert Scrub

Temporary Impacts

With a minimum of 90% coverage of this vegetation type, approximately 1.22 acres of the 1.35 total on the Project site will be temporarily impacted with low impact methods. This area will have pilings driven into the ground to support the solar array axis. No clearing or grading of vegetation or the surface will be conducted on this acreage. Any sensitive areas located in these areas, such as locations of special status species, or active burrows and nesting will be avoided, or impacts minimized using the mitigation measures.

Permanent Impacts

The construction of the Project within the gen-tie (electrical substation and access/maintenance roads will permanently remove approximately 0.31 acres of this vegetation in this area. The Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to this vegetation/habitat type.

Intermountain Basins Wash

Temporary Impacts

Assuming a minimum of 90% coverage of this vegetation type, approximately 0.72-acre of the 0.80 total on the Project site will be temporarily impacted with low impact methods. This area will have pilings driven into the ground to support the solar array axis. No clearing or grading of vegetation or the surface will be conducted on this acreage. Any sensitive areas located in these areas, such as locations of special status species, or active burrows and nesting will be avoided, or impacts minimized using the mitigation measures.

Permanent Impacts

The construction of the Project within the gen-tie line (electrical substation and access/maintenance roads will permanently remove approximately 0.18-acre of this vegetation in this area. The Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to this vegetation/habitat type.

Intermountain Basins Big Sagebrush Shrubland

Temporary Impacts

Since this vegetation type does not occur on the site, no temporary impacts are expected.

Permanent Impacts

The construction of the Project within the gen-tie (electrical substation and access/maintenance roads will permanently remove approximately 0.84-acre of this vegetation in this area. The

Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to this vegetation/habitat type.

Intermountain Basins Montane Sagebrush Steppe

Temporary Impacts

Since this vegetation type does not occur on the site, no temporary impacts are expected.

Permanent Impacts

The construction of the Project within the gen-tie (electrical substation and access/maintenance roads will permanently remove approximately 0.13-acre of this vegetation in this area. The Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to this vegetation/habitat type.

Great Basin and Intermountain Ruderal Shrubland

Temporary Impacts

With 90% coverage of this vegetation type, approximately 137 acres of the 152.2 total that is on the Project site will be temporarily impacted with low impact methods. This area will have pilings driven into the ground to support the solar array axis. No clearing or grading of vegetation or the surface will be conducted on this acreage. Any sensitive areas located in these areas, such as locations of special status species, or active burrows and nesting will be avoided, or impacts minimized using the mitigation measures.

Permanent Impacts

The construction of the Project within the gen-tie (electrical substation and access/maintenance roads will permanently remove approximately 26.32 acres of this vegetation in this area. The Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to this vegetation/habitat type.

Great Basin and Intermountain Introduced Grassland/Forbland

Temporary Impacts

With 90% coverage of this vegetation type, approximately 15.68 acres of the 17.42 total that is on the Project site will be temporarily impacted with low impact methods. This area will have pilings driven into the ground to support the solar array axis. No clearing or grading of vegetation or the surface will be conducted on this acreage. Any sensitive areas located in these areas, such as locations of special status species, or active burrows and nesting will be avoided, or impacts minimized using the mitigation measures.

Permanent Impacts

The construction of the Project within the gen-tie (electrical substation and access/maintenance roads will permanently remove approximately 2.3 acres of this vegetation in this area. The Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to this vegetation/habitat type.

Interior Western North American Temperate Ruderal Shrubland

Temporary Impacts

With 90% coverage of this vegetation type, approximately 6.24 acres of the 6.93 total that is on the Project site will be temporarily impacted with low impact methods. This area will have pilings driven into the ground to support the solar array axis. No clearing or grading of vegetation or the surface will be conducted on this acreage. Any sensitive areas located in these areas, such as locations of special status species, or active burrows and nesting will be avoided, or impacts minimized using the mitigation measures.

Permanent Impacts

The construction of the Project within the gen-tie (electrical substation and access/maintenance roads will permanently remove approximately 4.03 acres of this vegetation in this area. The Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to this vegetation/habitat type.

5.4 WILDLIFE

Temporary Impacts

Common wildlife species are expected to be affected due to installation of pilings to support the solar array axis. Although no clearing or grading of vegetation or the surface will be conducted on the site, general disturbance of wildlife is anticipated and impacts will be minimized using the mitigation measures.

Permanent Impacts

The construction of the Project within the gen-tie (electrical substation and access/maintenance roads will permanently remove habitat for common species. The Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to common wildlife.

5.5 SPECIAL-STATUS SPECIES

Plants

Although no special-status species were identified as occurring within the Project area, there is potential that future special-status species may occur. Likelihood of special-status plant species or rare plants occurring in the future on the Project site are low, however, focused blooming

surveys should be conducted prior to soil impacting construction activities to clear the site for potential future impacts.

Wildlife

No special-status wildlife species were found in the Project area or gen-tie line alignment. As discussed above, mule deer, pronghorn, bighorn sheep, and greater sage-grouse were identified by the NDOW as potentially occurring within the region. Moreover, golden eagle and burrowing owl were identified by NDOW as potentially occurring within the Project area.

Temporary Impacts

Although special-status wildlife species may be affected due to installation of pilings to support the solar arrays, no clearing or grading of vegetation or the surface will be conducted on the site and general disturbance of special-status wildlife is anticipated and impacts will be avoided/minimized with implementation of mitigation measures.

Permanent Impacts

The construction of the Project within the gen-tie (electrical substation and access/maintenance roads will permanently remove habitat for wildlife species. The Project will implement the mitigation measures outlined in Section 6 to minimize permanent impacts to any effects to special-status wildlife.

5.6 Operation and Maintenance

Operation and maintenance activities of the solar arrays are not expected to have permanent impacts to sensitive habitats or special-status species, as all aboveground structures will be located in fenced yards within previously disturbed areas, native vegetation and will require minimal maintenance once construction is complete. Routine maintenance will consist of quarterly to annual patrolling (e.g., foot or vehicle), and use of water to clean the solar arrays, and will not require significant disturbance of habitat.

Construction and maintenance vehicles will remain on designated Project access routes and existing surfaced roads. The Project will implement an ongoing worker education program to educate staff in recognizing and avoiding sensitive habitats in order to minimize impacts during maintenance and operation.

5.7 Interrelated and Interdependent Impacts

The Project activities are not interrelated with any other action, and there are no known interdependent effects.

5.8 CUMULATIVE IMPACTS

Cumulative effects include the effects of future state, Tribal, local, or private actions that are reasonably certain to occur in southeastern Honey Lake Valley. Future federal actions that are unrelated to the proposed action are not considered in this section because they will be subject to separate consultation pursuant to Section 7 of the FESA. The Project may contribute to the cumulative effects to special-status species and their habitats resulting from numerous developments and road expansions that are planned in the region. Planned developments in the area include Shreem Breeze-Sunseeker Solar Project, the Fish Springs Solar Project, Rock Springs Solar Project, and Sierra Plumas Rural Electric Cooperative Herlong to Fort Sage Intertie Line. In addition, road maintenance and improvements are planned for Calneva Road, and Rainbow Way between the Union Pacific railroad and Fort Sage Road.

These new developments and road improvements are likely to permanently impact the habitats of special-status species, including rare plants and wildlife associated with local habitats found in the Basin and Range of northwestern Nevada, raptors and other avian species that utilize alkali desert scrub, and alkali basins/flats/playas for foraging and roosting. These impacts may include take of special-status species, fragmentation or permanent loss of habitat, or reductions in the quality of habitat. While the Project may contribute to the cumulative effects resulting from new development and road expansion, most of the impacts from the Project are temporary, as habitat will be restored to preconstruction conditions following the completion of construction activities.

It is likely that many of the habitats temporarily impacted by Project construction will be fully restored by the time construction begins for many of the new developments planned in the area. Cumulative impacts will be minimized by constructing the Project with low impact methodologies (no grading, grubbing only, pile driving) access roads to follow existing roadways such that fragmentation of habitat will be minimized. To the extent possible, the Project will be constructed in areas that have previously been disturbed, or within alkali basins/flats/playas that do not harbor special status species.

6.0 IMPACT AVOIDANCE AND MINIMIZATION RECOMMENDATIONS

The following mitigation measures will be implemented by the Project to avoid or minimize the potential impacts to biological resources that may result from Project construction, operation, and maintenance. These mitigation measures have been grouped into two categories: general measures and species or habitat-specific measures. General mitigation measures apply to the entire Project site and gen-tie line corridor, and are organized into preconstruction, during construction, and postconstruction measures. General mitigation measures include worker education training, erosion control, ROW or PUE restoration, and seasonal construction-timing restrictions. Specific measures include those that will be implemented for specific species or habitat types, and detail procedures that will be utilized such as special plant species-blooming focus surveys prior to construction, migratory and nesting bird surveys and monitoring, and special status species avoidance and minimization measures.

6.1 General Preconstruction Measures

MM 1: Project Maps

Detailed construction maps showing location of sensitive environmental resources, construction sites and related features, environmental protection measures, and access routes will be provided to construction supervisors, and will be available to the construction crew members and environmental monitors prior to, and during construction activities.

MM 2: Worker Training

The Project's contractor will provide a qualified biologist(s) to conduct environmental compliance training, including an endangered species/sensitive habitat education program for construction crews prior to the commencement of the Project and during construction activities. Additional "tailgate" training will be conducted for new construction personnel as needed during the construction duration.

Sessions will likely include discussions of regulatory requirements, including the federal and Nevada Revised Statutes, Nevada Administrative Code, and consequences of noncompliance with these acts and requirements. Training will also include identification of special-status species that are likely to occur in the Project area and discussion of the values of sensitive habitats. Training will also brief construction crews on the blooming focus surveys results concerning special-status plant species for the Project areas and the findings and mitigation requirements.

MM 3: Educational Brochure

As part of construction training, the Project will produce an educational brochure for crews working on the Project. Color photos of threatened and endangered species, likely to occur in the Project area will be included, as well as a discussion of protective measures agreed to by the Project and the resource agencies of Nevada.

MM 4: Exclusion Zone Fencing

The Project will mark the boundaries of environmentally sensitive exclusion zones and sensitive habitat features that are to be avoided (active burrows, active nests, special status plant species locations, etc.) before and during construction with highly visible flagging or fencing to prevent impacts from vehicles. All construction personnel will be required to conduct work activities within the defined area only.

MM 5: Vegetation Removal

The contractor will only remove vegetation within the approved work area. Low impact construction will be adhered to minimize removal of vegetation and restrict grading. General Construction

MM 6: Work Area

The contractor will confine all heavy equipment, vehicles, and construction work to approved roads and work areas. Solar array work areas will be limited to what is necessary for construction (Pile Driver). Where possible, construction vehicles will be kept out of the Project area with the potential to support special-status species. Where these Biological Evaluation avoidance measures are not feasible, the Project applicant will apply for and obtain the appropriate permits prior to construction from the Nevada agencies, grading permit and will implement any additional avoidance or mitigation measures that are agreed upon during the grading permit process.

MM 7: Construction Monitoring

The Project will retain a qualified biologist(s) to be on-site during construction activities to perform pre-activity surveys just prior to construction to clear the work area of any special-status species, and to monitor compliance with mitigation measures.

MM 8: Workday Schedule

To the extent possible, the Project will conduct all construction activity during daylight hours only. Where it is deemed necessary and feasible, night lighting and monitors will be used for work that occurs after sundown.

MM 9: Vehicle Inspection

The Project will ensure that all construction personnel are instructed to visually check for wildlife beneath vehicles and equipment before moving or operating them.

MM 10: Speed Limit

The Project will enforce a speed limit of 15 miles per hour on private roads and the posted speed limit on public roads.

MM 11: Trench Ramping

At the conclusion of each day's trenching or excavating activities, the end of the trench will be ramped at an approximate 2 to 1 slope to allow any wildlife that enters the trench to escape. A biological monitor may approve the use of boards placed at an approximate 2 to 1 slope for site-specific, pre-approved locations where earthen escape ramps are not feasible.

MM 12: Sensitive Habitat Monitoring and Procedures if Listed Species are Found

In accordance with the FESA, Nevada Revised Statues, and Nevada Administrative Code, the Project will retain a qualified biological monitor to inspect any construction activity in habitat that is to be avoided or preserved to ensure that no unauthorized or unnecessary take of listed species or destruction of their habitat occurs. Upon recommendation of the biological monitor, the work supervisor or contractor will be responsible for avoiding and stopping all activities that may result in such take or destruction of habitat until appropriate corrective measures have been completed. The Project will be responsible for immediately reporting any unauthorized impacts to the USFWS and NDOW.

MM 13: Trash Cleanup

The contractor will properly contain and remove all trash and waste items generated by construction or crew activities.

MM 14: Prohibitions for Pets, Fire, Firearms

The contractor will prohibit employees, contractors, and subcontractors from having pets, campfires, or firearms at the Project site. Smoking will be limited to designated smoking areas only.

6.2 General Postconstruction Measures

MM 15: Restoration

The Project will restore work areas to pre-existing contours and conditions upon completion of work. Restoration, including revegetation and soil stabilization, will be performed as outlined in the Restoration and Monitoring Plan described below.

MM 16: Project Restoration Plan

The contractor will prepare a Restoration and Monitoring Plan to address postconstruction revegetation, success criteria, and monitoring periods in natural areas. The intent of this plan will be to ensure that impacts are minimized and adequately mitigated to the satisfaction of the permitting agencies, property owners, and/or habitat managers. Restoration will result in restoration of temporarily disturbed areas to conditions similar to preconstruction conditions. The Restoration and Monitoring Plan to be developed by the contractor for review with resource agencies will include, at a minimum, the following measures:

- At the completion of construction activities, the ROW/PUE will be graded to restore flow lines and natural topography.
- Ripping or disking will be performed to relieve compaction at identified locations as needed.
- Stockpiled topsoil will be re-spread, providing organic matter and a seed bank for restoration.
- At the completion of soil work, all areas disturbed by construction activities will be subject to implementation of permanent erosion control measures.
- Permanent erosion control measures could include spreading a combination of native grass and forb seed, fertilizer, compost, and mulch for soil protection.
- Seed mixes will be identified, for Alkali Desert Scrub (saltbush scrub areas and existing disturbed habitat areas.

MM 17: Seed Mix and Success Criteria

In sensitive communities such as Alkali Desert Scrub (saltbush scrub) areas, the Project's Restoration and Monitoring Plan will include the use of native seed or plantings and will specify native species lists and propagule types, quantities of material, and appropriate success criteria and monitoring requirements to be determined in discussion with the appropriate resource agencies with responsibility for those areas (e.g., Washoe County and NDOW).

MM 18: Erosion Control

The contractor will install and maintain appropriate temporary erosion and sediment control measures until revegetation is successful as defined by the success criteria to be outlined in the Restoration and Monitoring Plan.

6.3 Species Specific Measures

Special-status and Nesting Birds MM 19: Bird Nest Surveys and Monitoring

Because construction will take place during the breeding and nesting season of avian species in the action area (typically February 1 through August 31), the contactor's biologist will conduct nesting bird surveys prior to construction for avian species with potential to occur on-site, or where accessible, in areas adjacent to construction. Pre-construction surveys will be completed no more than 30 days prior to ground disturbance and will include a 100-ft buffer area of the Project alignment to be surveyed. Where nesting migratory birds are found in or near the proposed construction areas, the birds and their nests will be evaluated by a qualified biologist. If nest disturbance is anticipated, the biologist will ensure adequate mitigation measures are implemented (MM 20).

MM 20: Nesting Birds

In accordance with the MBTA, if an active nest is observed in the action area during construction, the biologist will stop work within the appropriate buffer for the species and contact the biological monitor immediately. Nest disturbance is dependent on a number of site-specific and activity-specific factors, including the sensitivity of the species, proximity to work activity, amount of noise or frequency of the work activity, and intervening topography, vegetation, structures, etc. Additional mitigation may be required to minimize disturbance of detected nesting activity, such as allowing nesting activity to conclude before continuing construction in an area, restricting certain types of construction practices/activities, creating screening devices to shield nest sites from construction activity, and establishing buffer areas around active nest sites. For inactive nests, measures could include removal and/or handling of nest materials, which will be conducted under the supervision of a qualified biologist.

7.0 CONCLUSION

Potential direct effects resulting from Project construction include species harassment, displacement, or mortality; habitat destruction; or impacted water quality resulting from potential accidental hazardous material spills, sedimentation, or altered hydrology. Potential indirect effects include loss or degradation of future habitat functionality or impacted water quality resulting from adverse habitat modification causing future sedimentation and/or altered hydrology. Potential adverse impacts to these species and their habitats can be minimized or avoided if Project conservation measures are implemented. Implementation of appropriate construction BMPs, restricting work to non-sensitive or designated areas, providing

environmental awareness to the crew, careful handling of chemicals near waterways, use of non-invasive installation methods, and restoring the site appropriately are general measures that will minimize or avoid the negative effects that may be associated with construction of the Project.

Additional conservation measures that may avoid or minimize adverse effects to potentially occurring special-status species include avoiding sensitive temporal windows for wildlife, conducting appropriate preconstruction surveys for wildlife species in the Project area, checking for wildlife beneath vehicles and equipment in the Project area, restricting construction activities to daylight hours where feasible, and having a qualified biologist on-site for construction monitoring, conducting blooming focused surveys for special status plant species, and preconstruction surveys. Implementation of these measures will greatly reduce the potential for significant impacts to special-status species and their habitats.

10. REFERENCES

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Appendix A

Maps

Project Location..... Figure 1
Project Area.....Figure 2
Vegetation in Project Area.....Figure 3
Water Resources in Project Area.....Figure 4
Soils in Project Area.....Figure 5

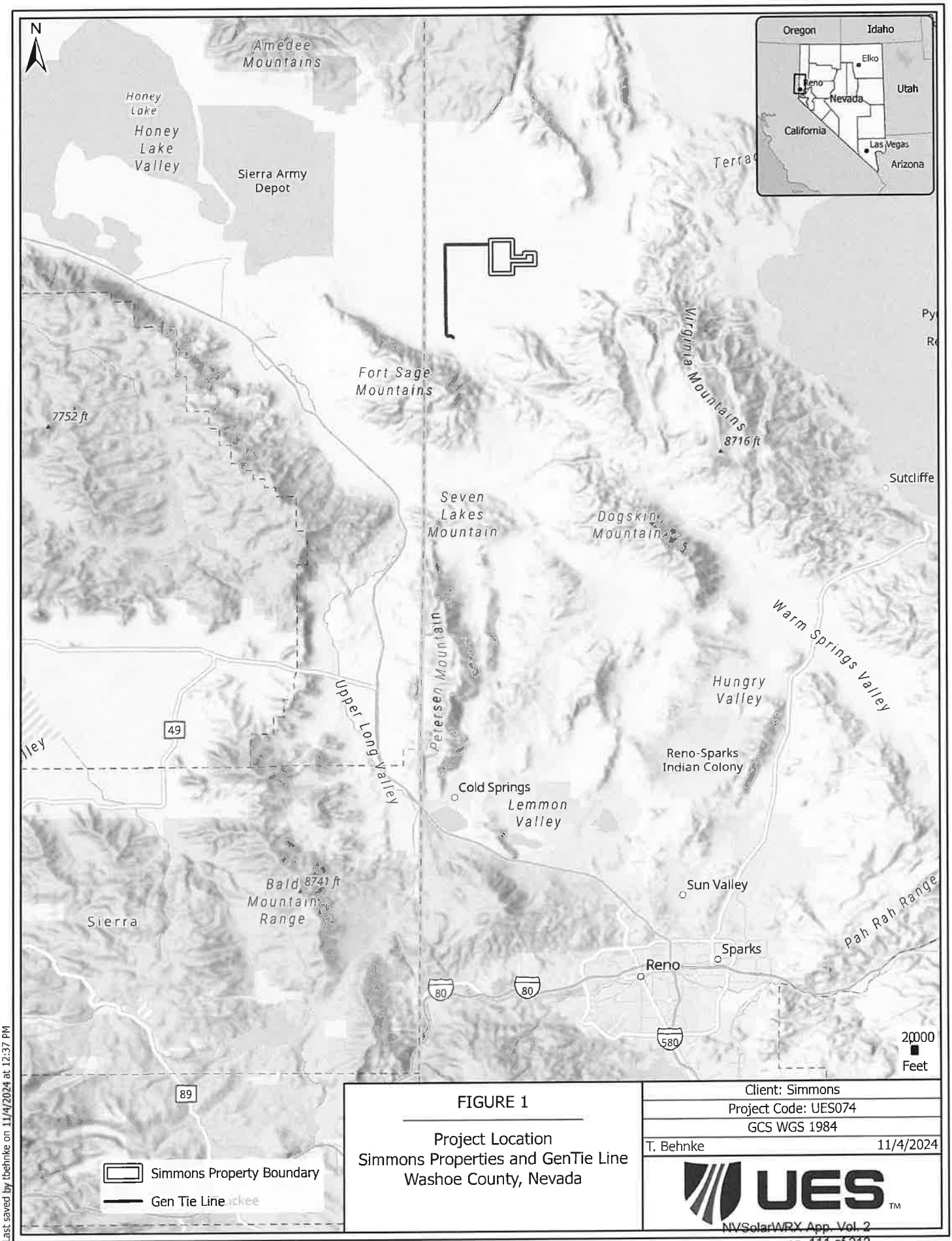


FIGURE 1

Project Location
Simmons Properties and GenTie Line
Washoe County, Nevada

Client: Simmons	
Project Code: UES074	
GCS WGS 1984	
T. Behnke	11/4/2024

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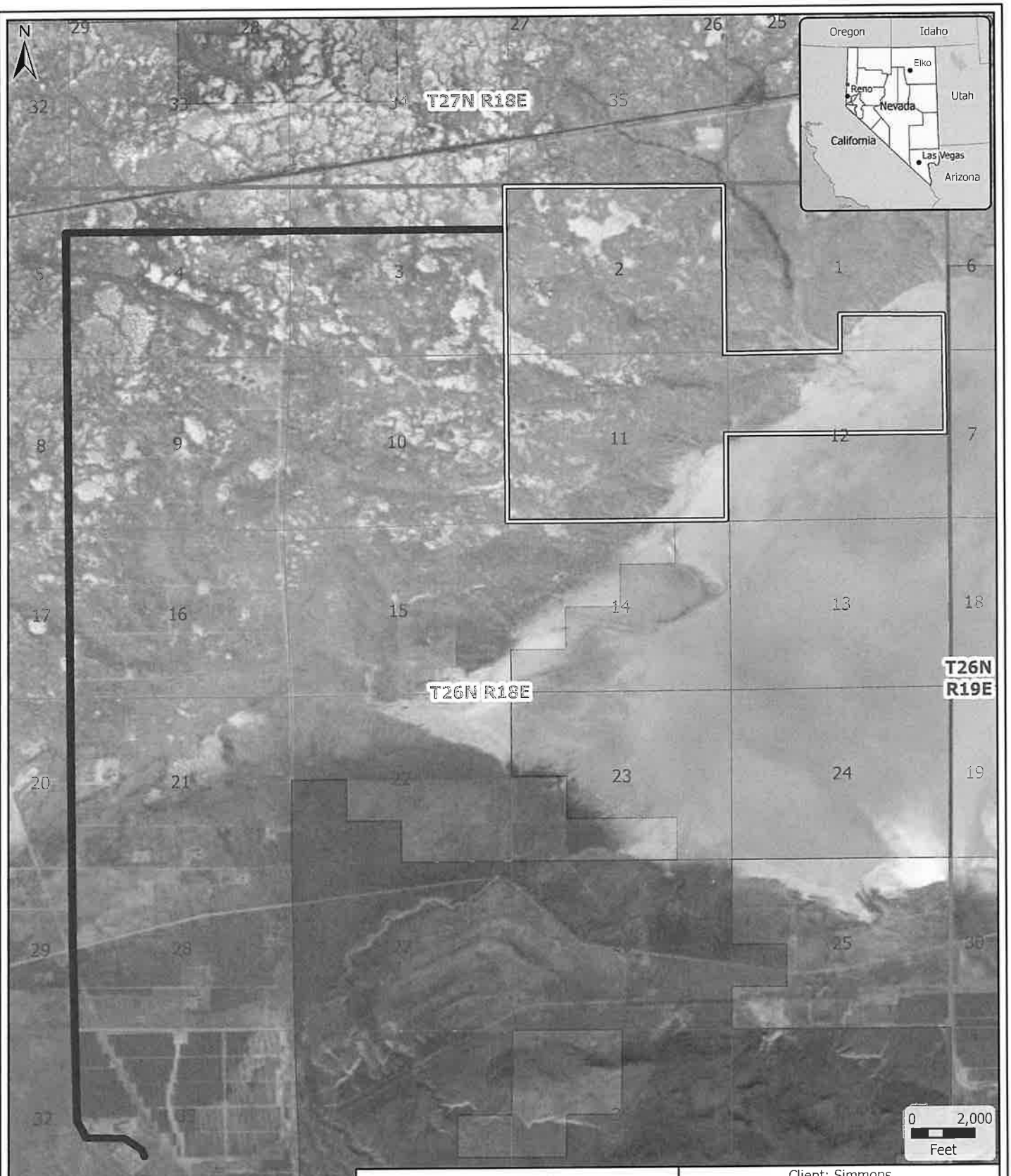


FIGURE 2

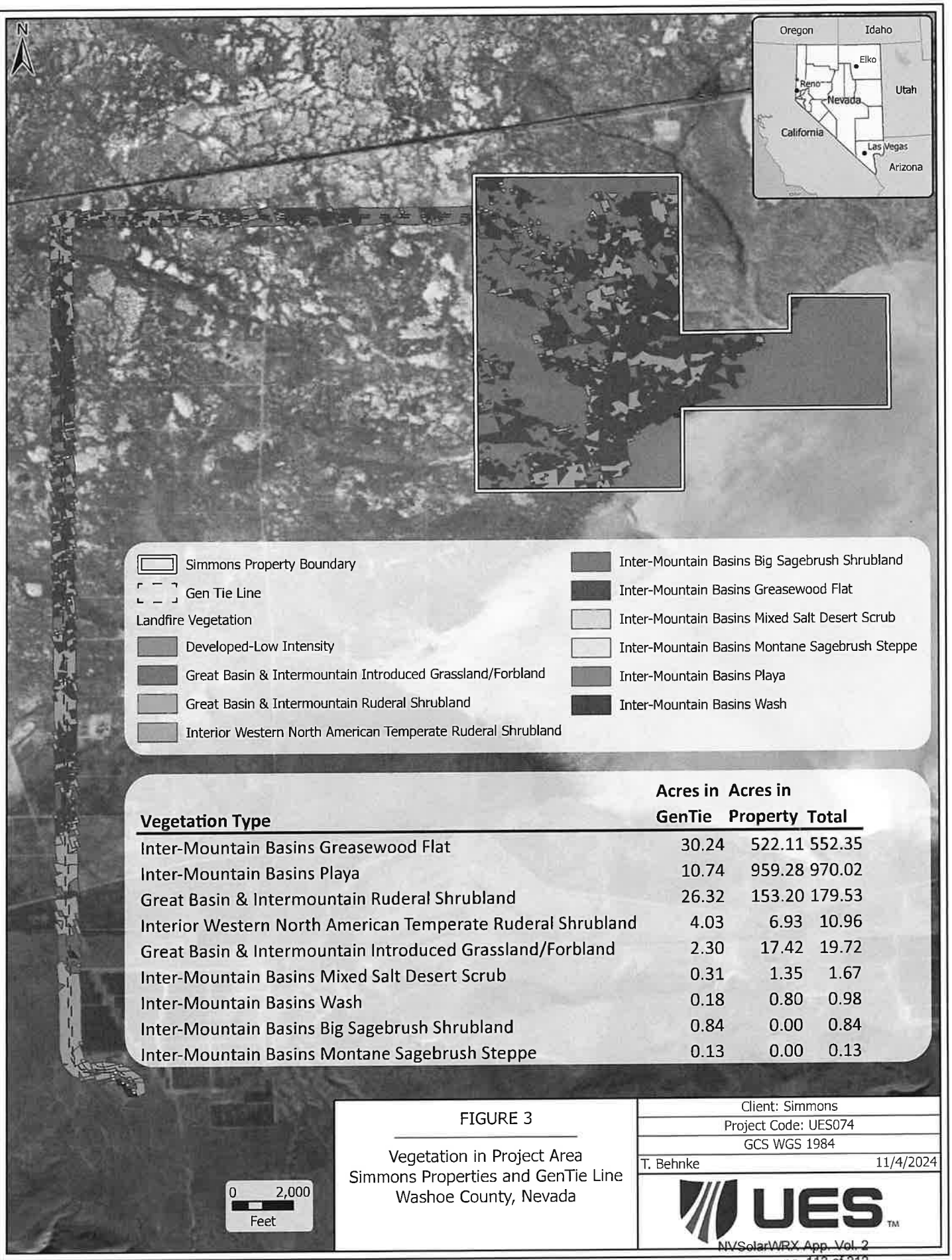
Project Area
Simmons Properties and GenTie Line
Washoe County, Nevada

Client: Simmons	
Project Code: UES074	
GCS WGS 1984	
T. Behnke	11/4/2024

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Vegetation Type	Acres in GenTie	Acres in Property	Total
Inter-Mountain Basins Greasewood Flat	30.24	522.11	552.35
Inter-Mountain Basins Playa	10.74	959.28	970.02
Great Basin & Intermountain Ruderal Shrubland	26.32	153.20	179.53
Interior Western North American Temperate Ruderal Shrubland	4.03	6.93	10.96
Great Basin & Intermountain Introduced Grassland/Forbland	2.30	17.42	19.72
Inter-Mountain Basins Mixed Salt Desert Scrub	0.31	1.35	1.67
Inter-Mountain Basins Wash	0.18	0.80	0.98
Inter-Mountain Basins Big Sagebrush Shrubland	0.84	0.00	0.84
Inter-Mountain Basins Montane Sagebrush Steppe	0.13	0.00	0.13

FIGURE 3

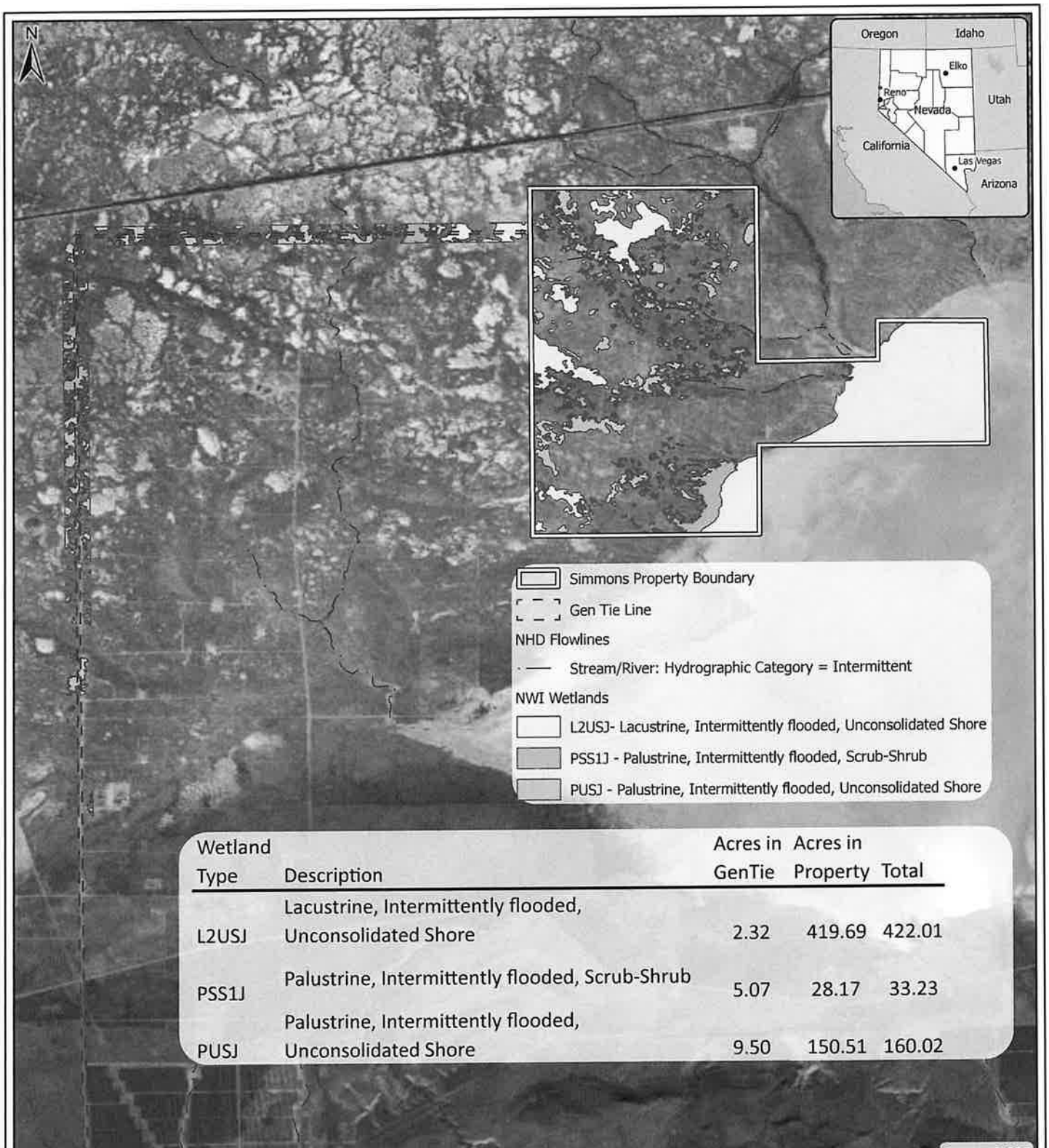
Vegetation in Project Area
Simmons Properties and GenTie Line
Washoe County, Nevada

Client: Simmons
Project Code: UES074
GCS WGS 1984
T. Behnke 11/4/2024

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Wetland Type	Description	Acres in GenTie	Acres in Property	Total
L2USJ	Lacustrine, Intermittently flooded, Unconsolidated Shore	2.32	419.69	422.01
PSS1J	Palustrine, Intermittently flooded, Scrub-Shrub	5.07	28.17	33.23
PUSJ	Palustrine, Intermittently flooded, Unconsolidated Shore	9.50	150.51	160.02

FIGURE 4

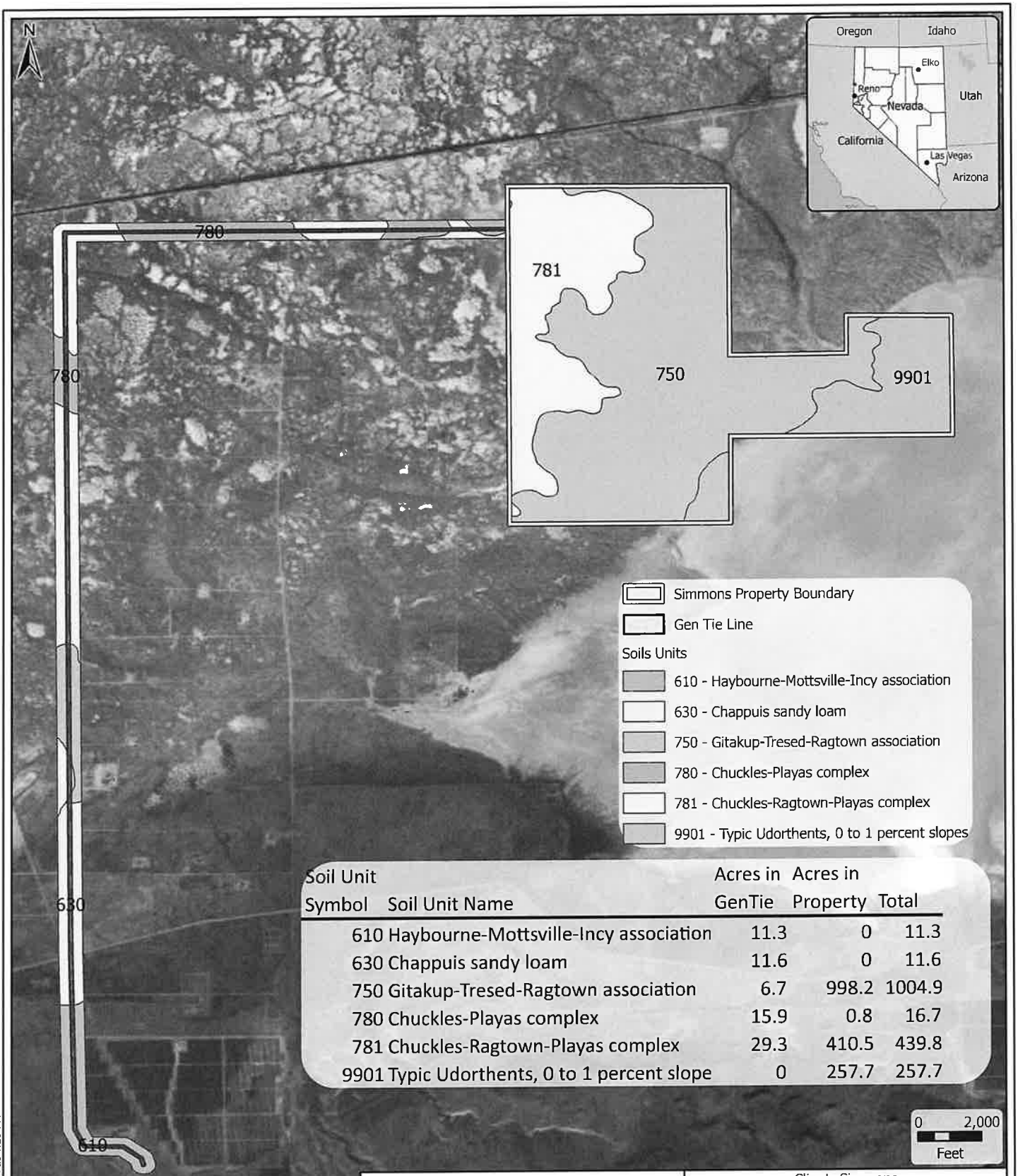
Water Resources in the Project Area
Simmons Properties and GenTie Line
Washoe County, Nevada

Client: Simmons
Project Code: UES074
GCS WGS 1984
T. Behnke 11/4/2024

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Soil Unit Symbol	Soil Unit Name	Acres in GenTie	Acres in Property	Total
610	Haybourne-Mottsville-Incy association	11.3	0	11.3
630	Chappuis sandy loam	11.6	0	11.6
750	Gitakup-Tresed-Ragtown association	6.7	998.2	1004.9
780	Chuckles-Playas complex	15.9	0.8	16.7
781	Chuckles-Ragtown-Playas complex	29.3	410.5	439.8
9901	Typic Udorthents, 0 to 1 percent slope	0	257.7	257.7

0 2,000 Feet

FIGURE 5

Soils in Project Area
Simmons Properties and GenTie Line
Washoe County, Nevada

Client: Simmons
Project Code: UES074
GCS WGS 1984
T. Behnke 11/4/2024

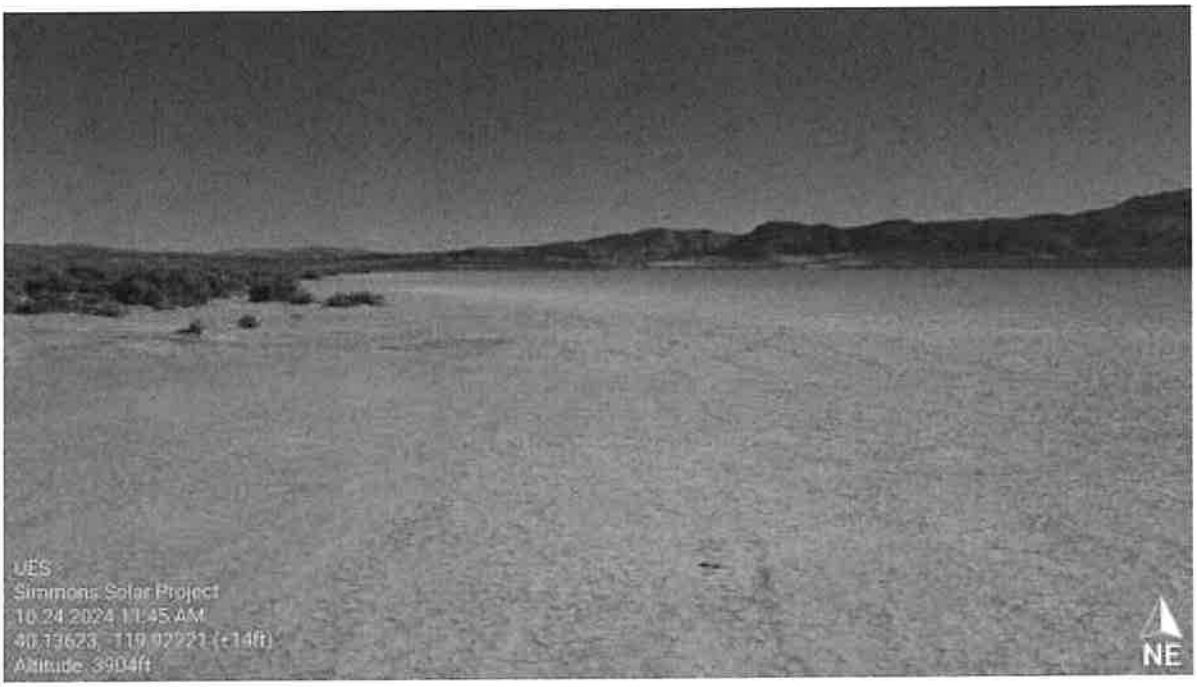
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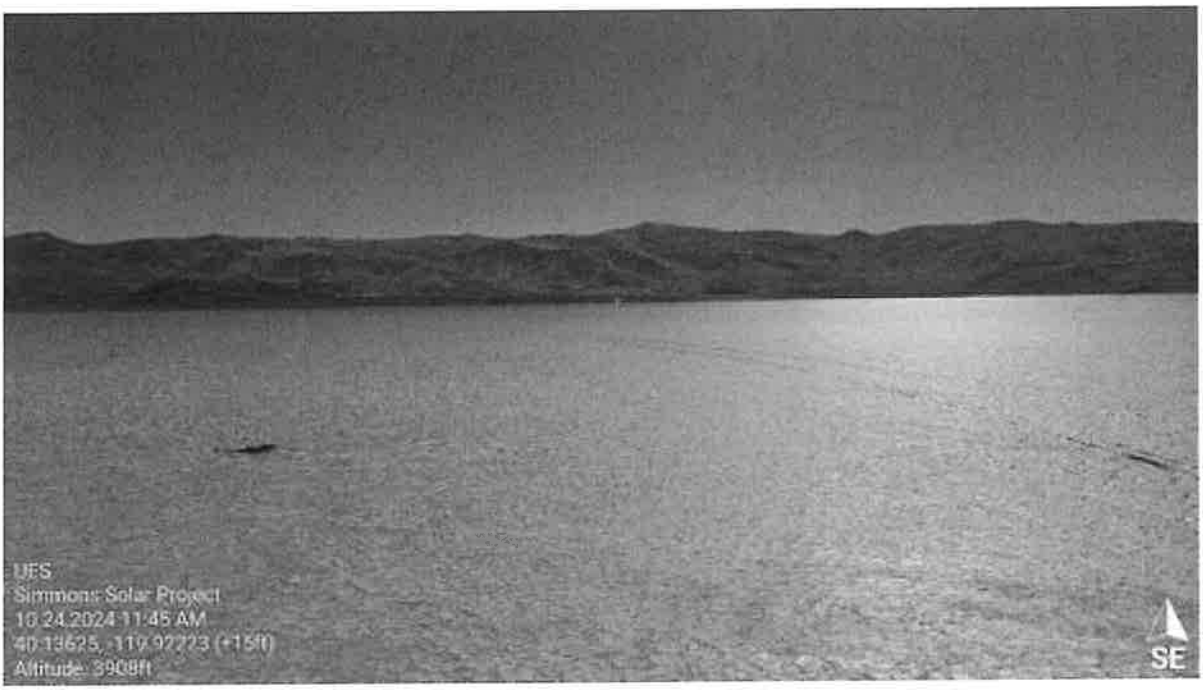
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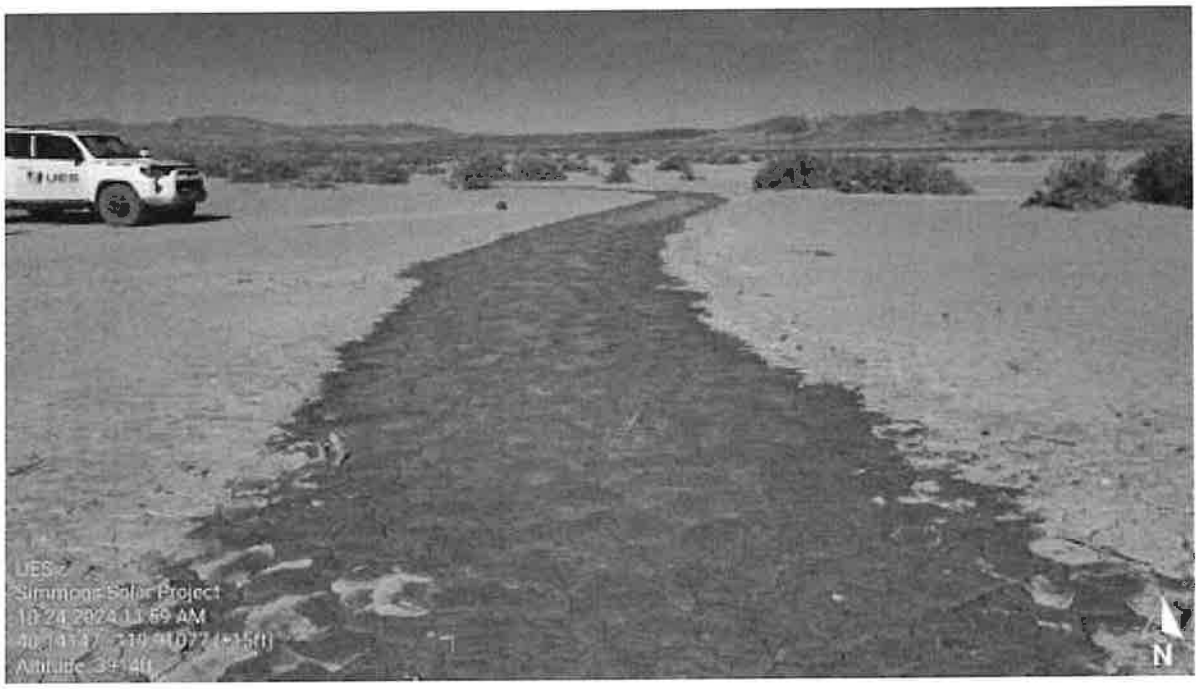
Appendix B

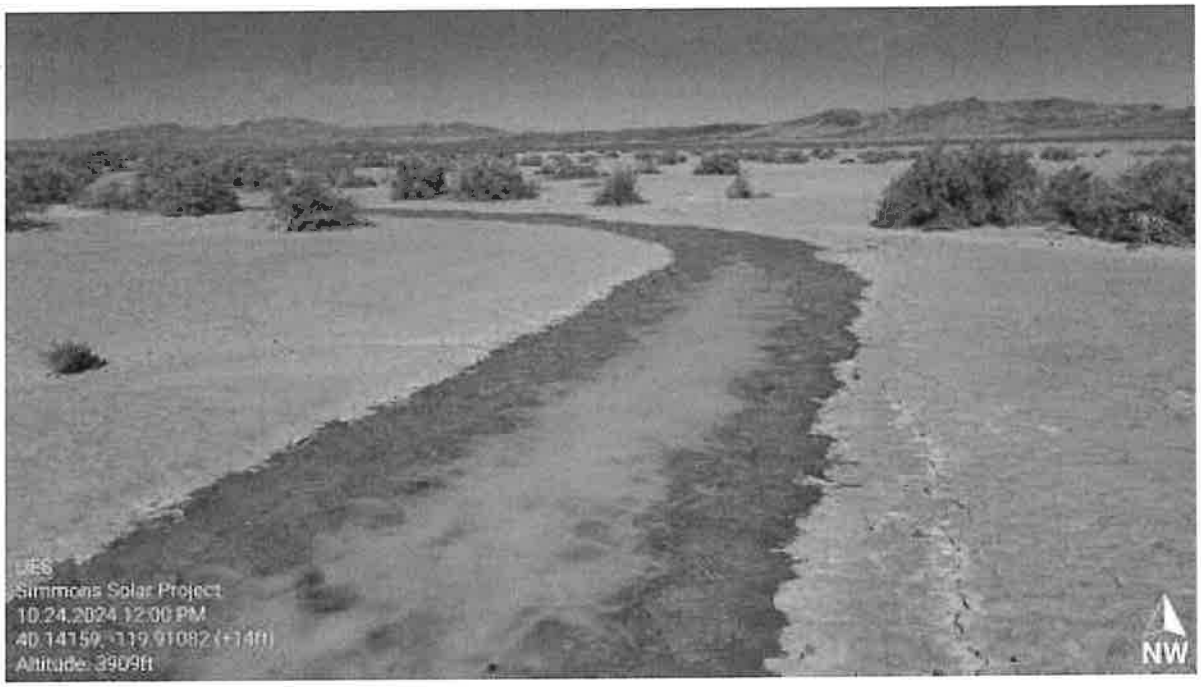
Photographic Log





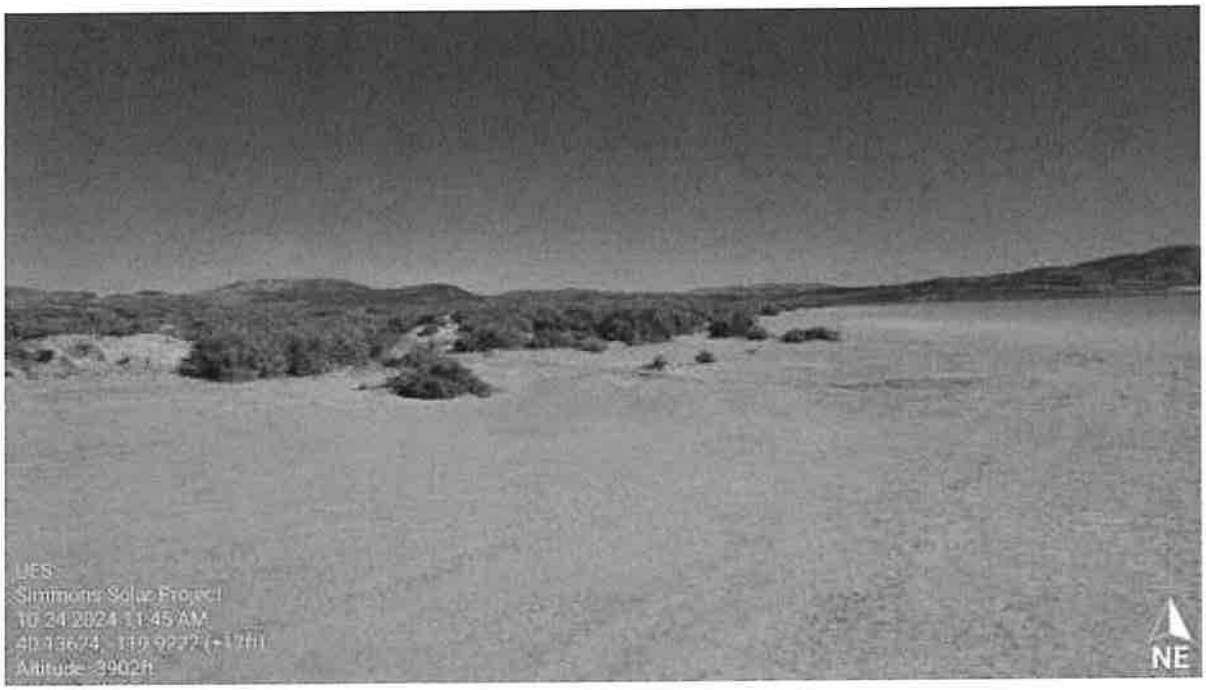
Photos 1-2 – Dead Horse Lakebed in eastern portion of the site



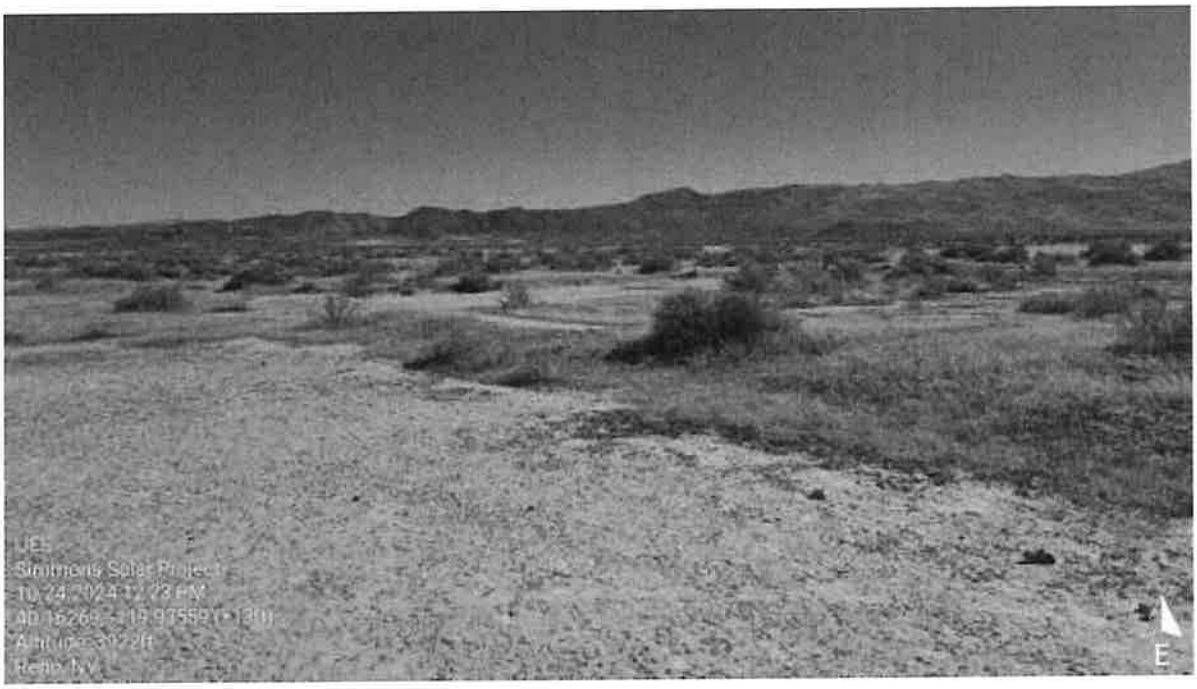


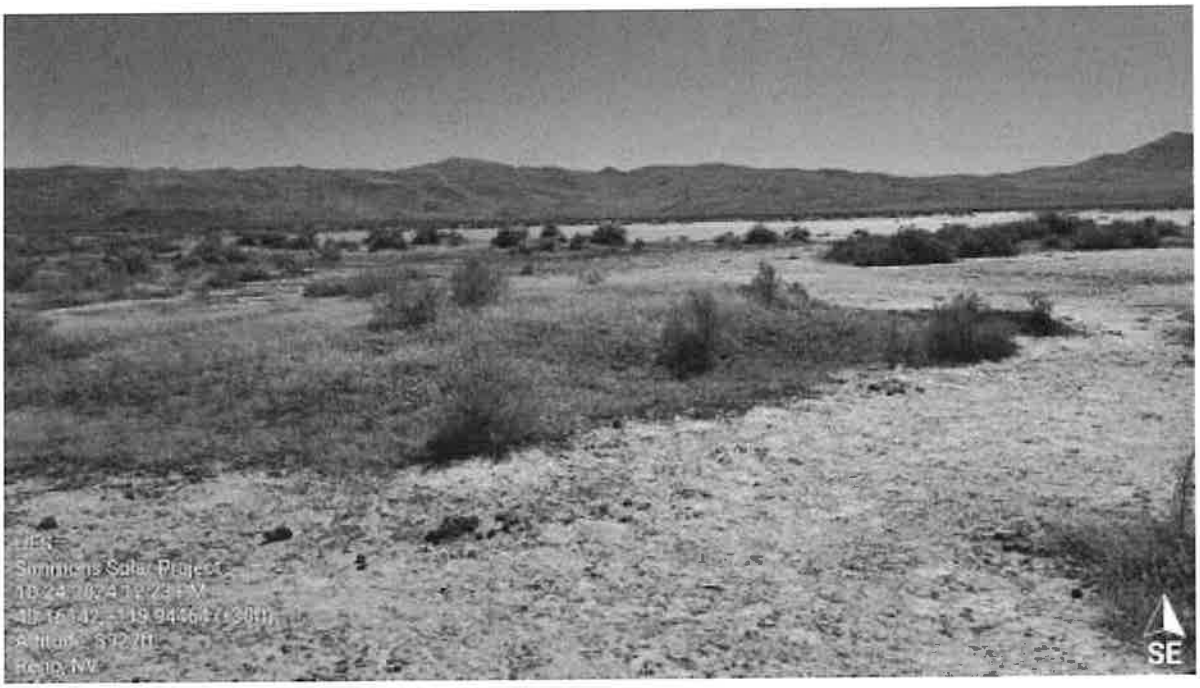
Photos 3-4 – Ephemeral Drainage to Dead Horse Lakebed



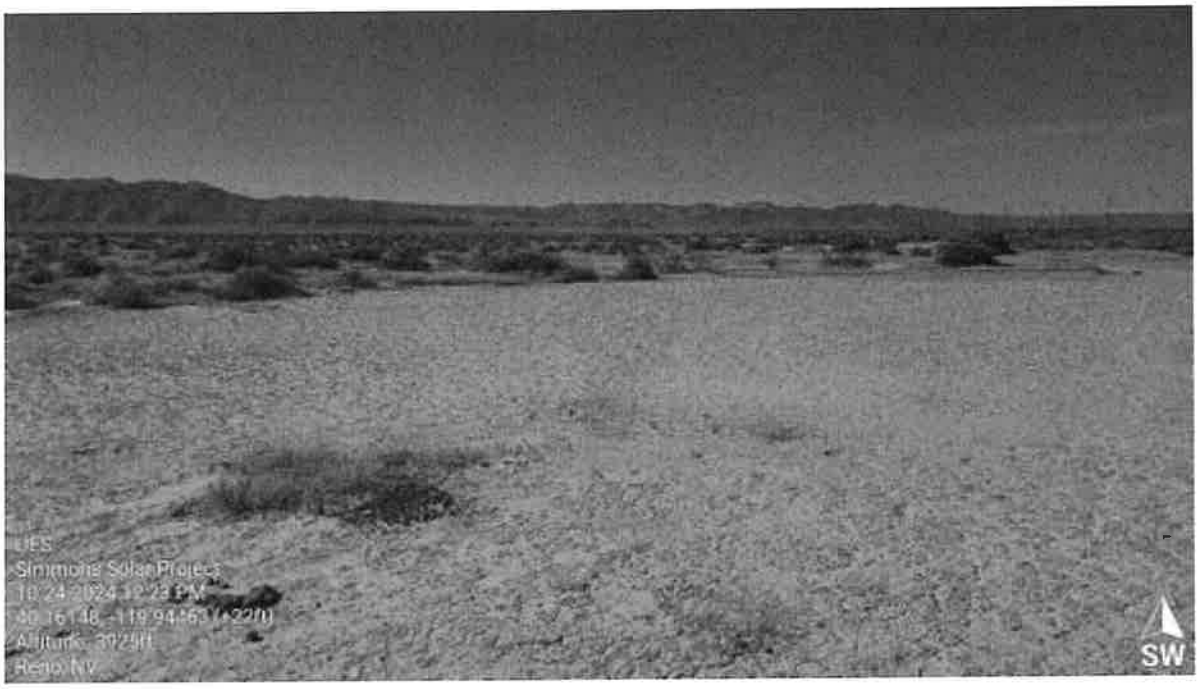


Photos 5-6 – Ephemeral Drainage outlet and Dead Horse Lake edge



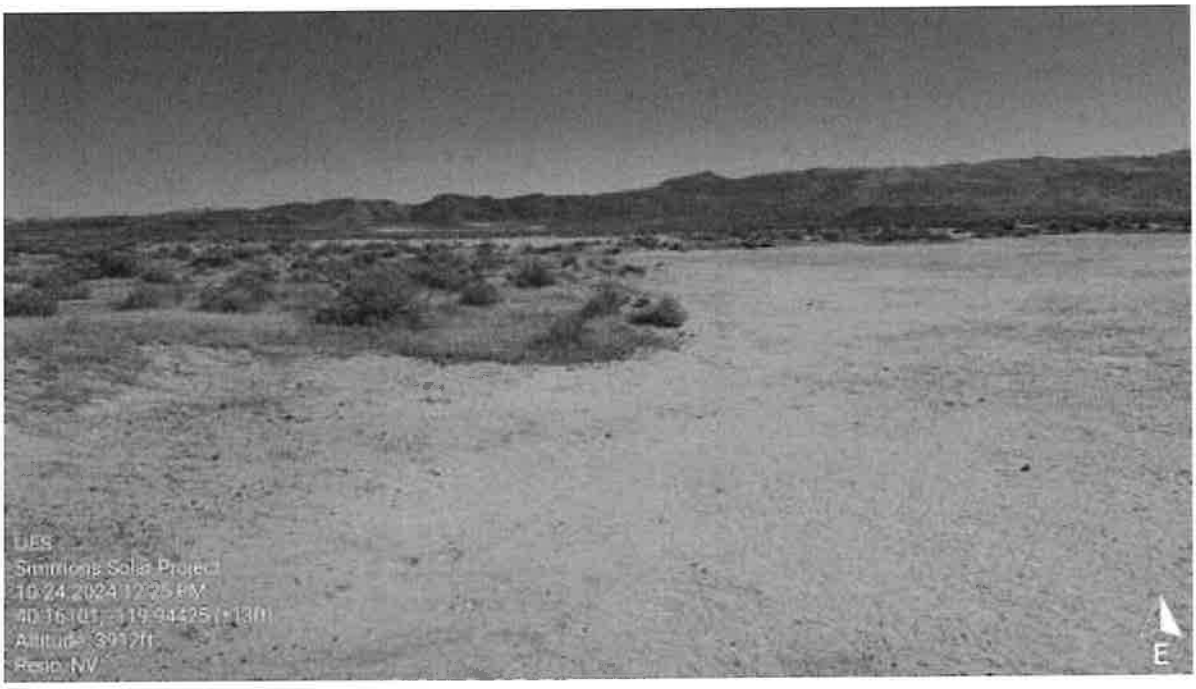


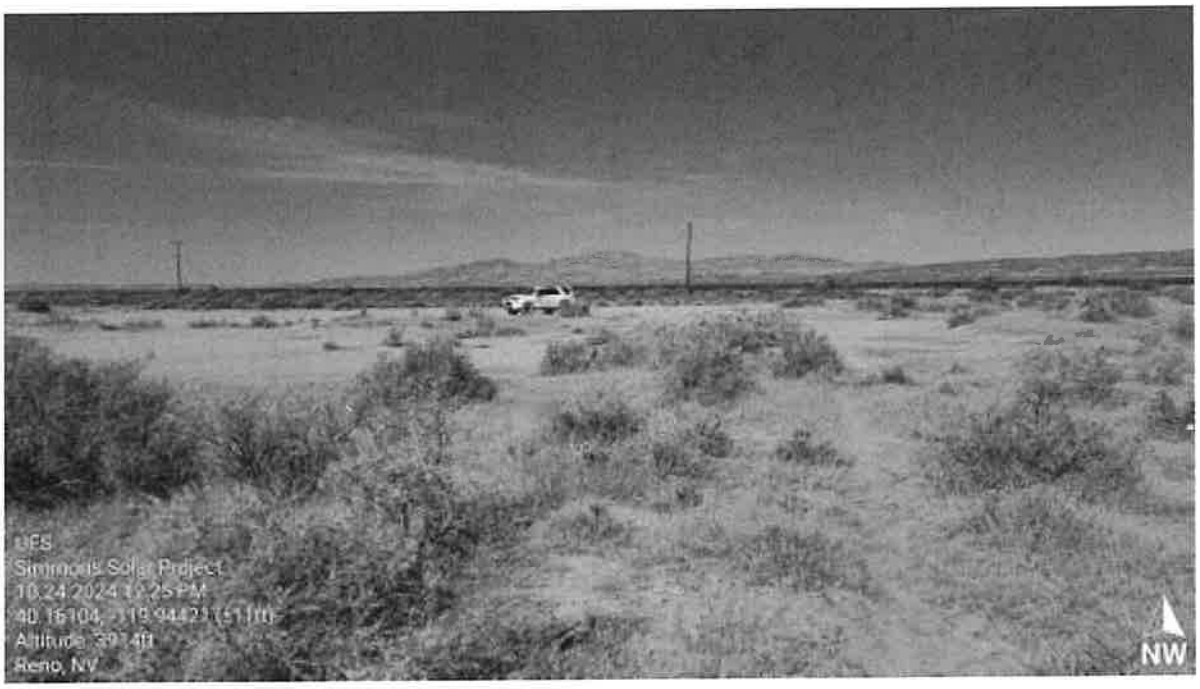
Photos 7-8 – Intermountain Ruderal Shrubland Vegetation



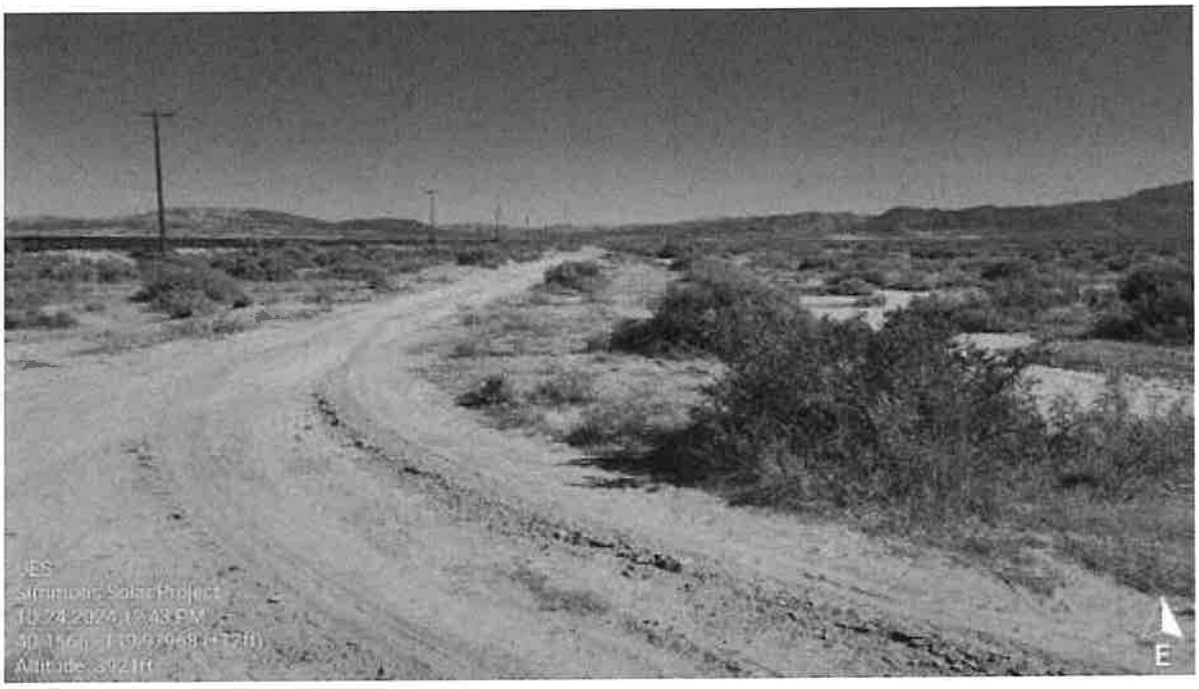


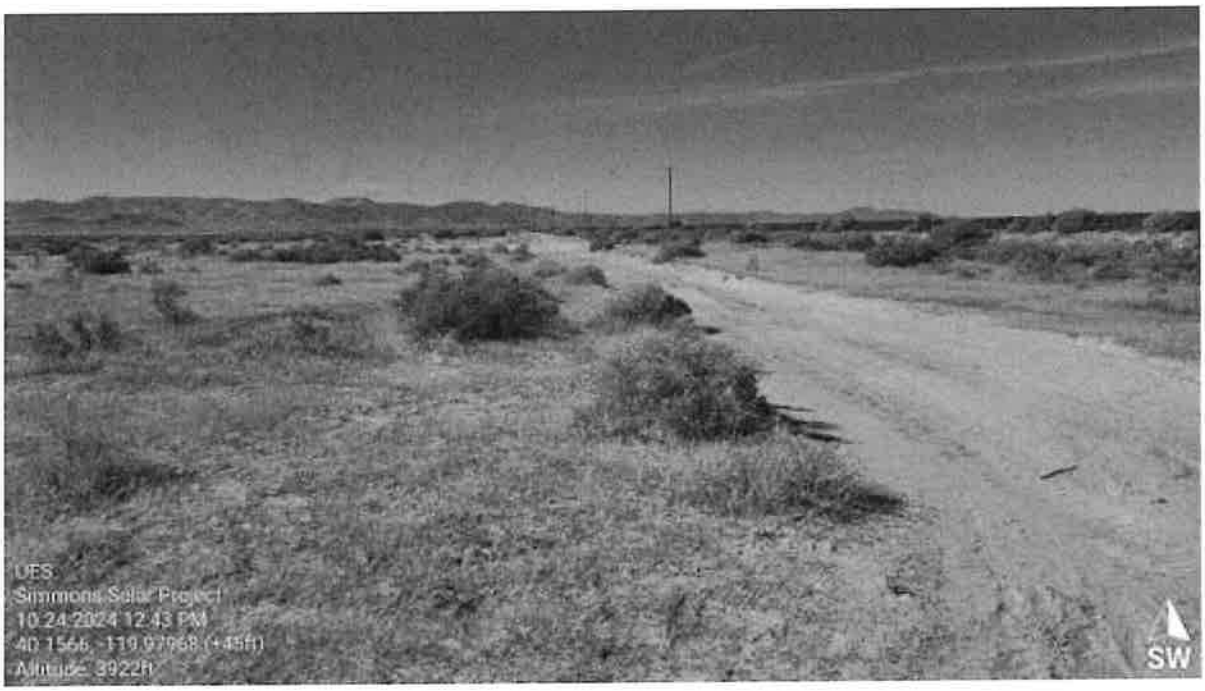
Photos 9-10 – Intermountain Basins Playa Vegetation



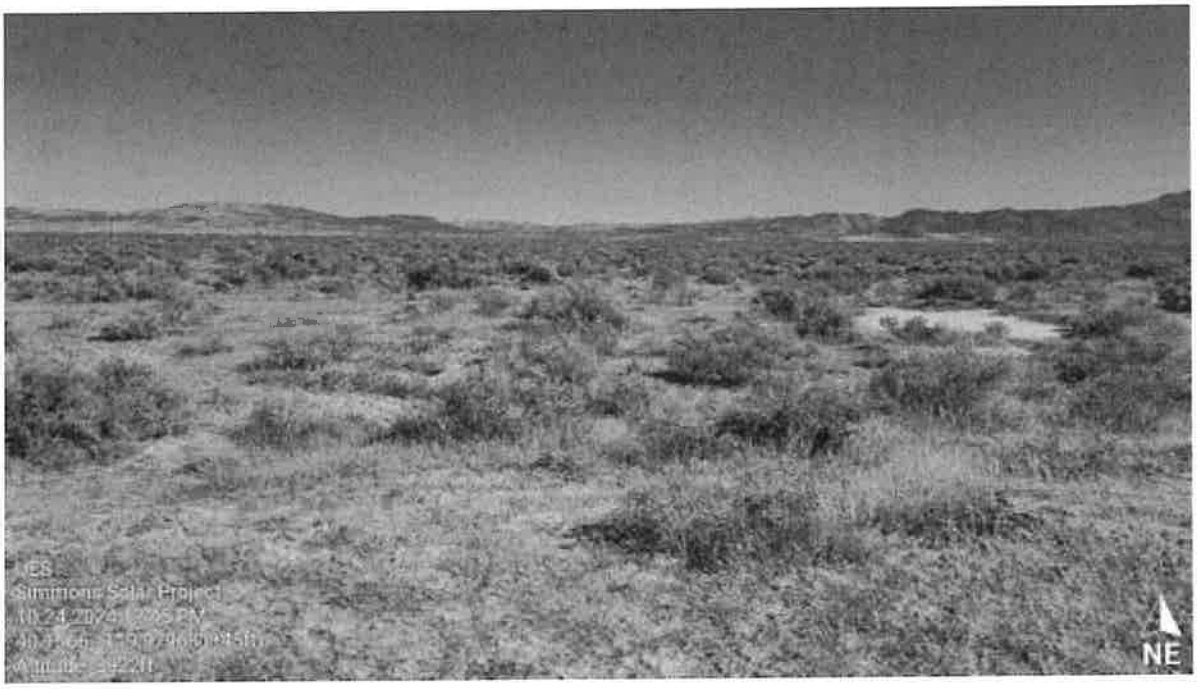


Photos 11-12 – Intermountain Greasewood Flat Vegetation





Photos 13-14 – Greasewood Flat and Ruderal Shrubland Vegetation along Gen-Tie





Photos 15-16 – Great Basin and Intermountain Ruderal Shrubland





Photos 17-18 – Intermountain Ruderal Shrubland

Appendix C – Class III Cultural Inventory

Class III Cultural Resources Inventory Report for the Simmons Solar Project

WASHOE COUNTY, NEVADA

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List of Abbreviations

Amsl	above mean sea level
APE	Area of potential effect
BCE	Before common era
CE	Common Era
CFR	Code of Federal Regulations
FR	Federal Register
FS	Field specimen
NAGPRA	Native American Graves Protection and Repatriation Act
NBMG	Nevada Bureau of Mines and Geology
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
USC	United States Code
USGS	United States Geological Survey

1.0 INTRODUCTION

UES is providing environmental consulting services and cultural resources support for the proposed Simmons Washoe County Solar Energy Production Project ("Project"), which proposes the development of photovoltaic solar energy production facilities on four parcels in Washoe County, NV (Figure 1). UES is completing the project in two phases. A Cultural and Historic Resources Assessment is a component of the regulatory efforts for a Nevada Utility Environmental Protection Act (UEPA) construction permit required for the project. UES has conducted a Class III Inventory aimed at determining the level of prior archaeological survey, identifying and evaluating archaeological sites or National Register of Historic Places (NRHP)-eligible or listed properties, and providing recommendations for further archaeological work in the project area.

The Area of Potential Effect (APE), as defined under 36 CFR 800.16(d), includes areas within which an undertaking may affect the character of archaeological resources during construction by ground disturbance and where the character or use of historic structures or buildings may be directly or indirectly affected by the construction and operation of the project. Direct effects may occur where grading, clearing and grubbing, excavating, or other ground disturbance is planned; or when buildings, structures, or objects are altered or removed. Indirect effects may include increased noise or vibration, or changes to the viewshed, among others. The indirect APE is developed to consider any visual, audible, and atmospheric effects that the project may have on historic properties.

This report complies with Public Law 113-287 (Title 54 United States Code [USC]), which incorporates the provisions of the National Historic Preservation Act (NHPA) of 1966, as amended, and the Archeological and Historic Preservation Act of 1974, as amended. The report also meets the regulations for implementing NHPA Section 106 found in 36 CFR Part 800 (Protection of Historic Properties) and those outlined in the Bureau of Land Management (BLM) Guidelines and Standards for Archaeological Inventory (sixth edition, 2019). The Principal Investigator for this effort exceeds the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register [FR] 44716-42) and has extensive experience in conducting archaeological investigations in Nevada.

2.0 PROJECT LOCATION AND ENVIRONMENT

The Simmons Solar project area comprises roughly 1,715 acres of private land located southwest of Flanigan, Washoe County, NV. The project area is bordered on the north by the Western Union Railroad grade, but is otherwise located in undeveloped desert on the edge of a playa on the eastern arm of Honey Lake Valley. The subject property is depicted on the Flanigan, NV (2021) USGS 7.5-minute topographic quadrangle maps within portions of Section 1, 2, 11, and 12 of Township 26 North Range 18 East. The project area is relatively level with an elevation ranging from roughly 3,980 and 3,985 ft. above mean sea level (amsl; Figure 2). Although the project area measures approximately 1,715 acres, the Phase I project area encompasses only about 25 acres in the northwestern portion of this boundary, which is the area where the substation will be constructed. This 25-acre parcel planned for substation construction was the survey area or direct area of potential effects (APE) for the current undertaking. In addition to this 25-acre survey parcel, UES conducted the same Class III cultural resources inventory on an additional survey parcel (27 acres) within the overall 1,715-acre subject property. This additional survey area was located to the southeast along the strip of coppice dunes bordering the shoreline of the

Dead Cow pluvial lake playa situated along the southeast margins of the subject property. This area was chosen for Class III field efforts due to its high archaeological potential.

2.1 NATURAL SETTING

The project area lies within EPA Ecoregion 13h, the Lahontan and Tonopah Playa region of the Central Basin and Range. The Central Basin and Range is characterized by north-trending fault-block mountain ranges separated by arid basins. The lower elevations, including valleys, slopes, and alluvial fans, are covered with shrubs and grasses, while higher mountain slopes support woodlands, mountain brush, and scattered forests. This internally drained region is fed by rivers from the eastern Sierra Nevada slopes and the Humboldt River system.

The area was once partly submerged under Pleistocene Lake Lahontan, evidenced today by flat, alkaline playas. Climatically, it's drier than the Sierra Nevada, cooler than the Mojave Basin and Range, and warmer and drier than the Northern Basin and Range. Land use in Ecoregion 13 is primarily focused on livestock grazing, with a higher percentage dedicated to this purpose compared to the neighboring Ecoregion 14. Some valleys near mountain water sources support irrigated agriculture. The region also hosts significant military installations, which impact the environment due to their large size and unique land management practices. (Bryce et al. 2003).

The Lahontan and Tonopah Playas region (13h) is characterized by flat, often barren landscapes featuring mud flats, alkali flats, and intermittent saline lakes. These features are remnants of the ancient Pleistocene Lake Lahontan, which was once comparable in size to Lake Erie. These playas, located at the lowest elevations of the Lahontan Basin, serve as the endpoints for rivers flowing eastward from the Sierra Nevada. They experience seasonal flooding from winter runoff, creating temporary habitats for migratory birds. The playa perimeters may support black greasewood or four-winged saltbush, which often stabilize small sand dune areas in the transition to salt shrub communities (Bryce et al. 2003).

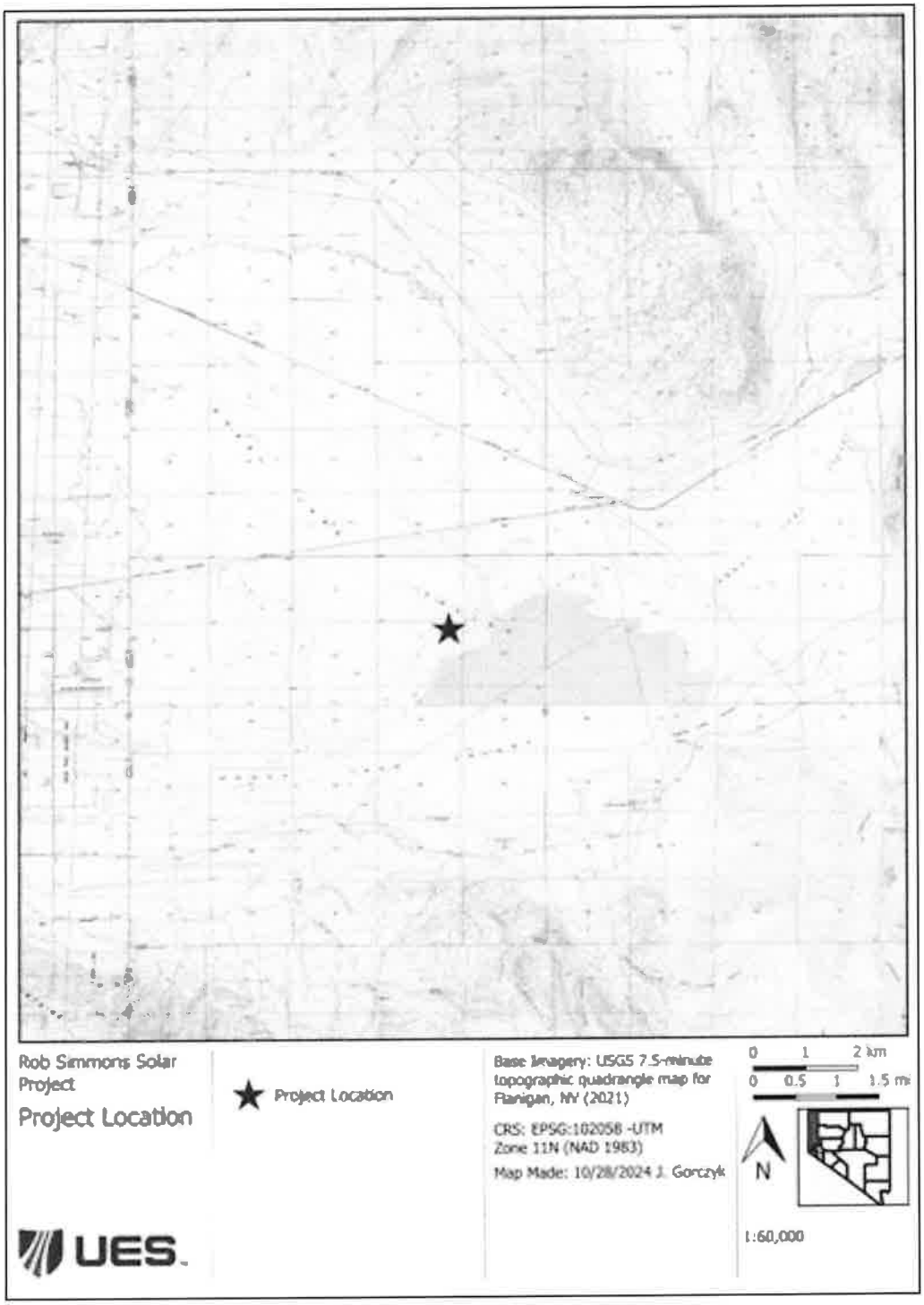


Figure 1. Project Location

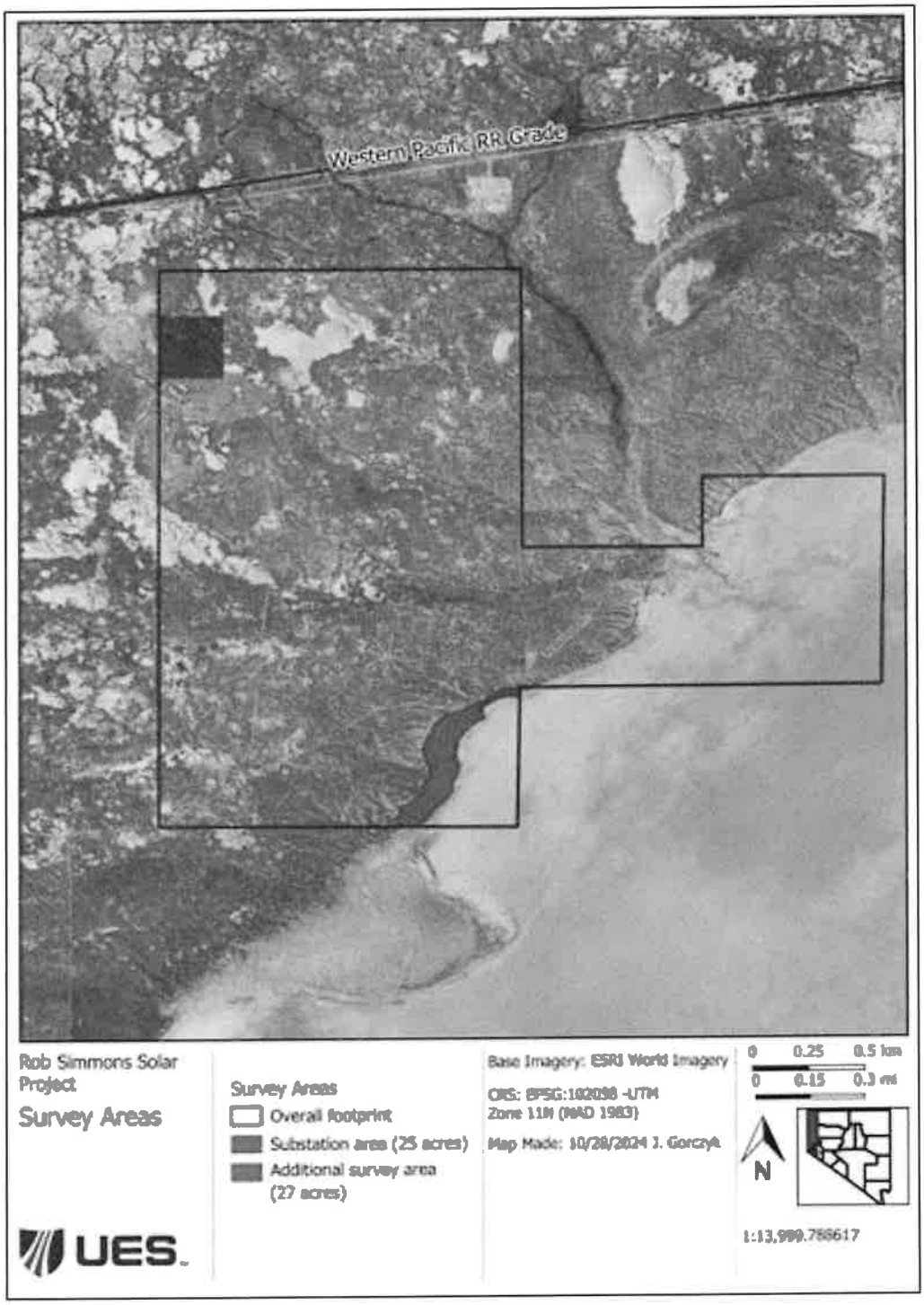


Figure 2. Project survey areas

2.2 SOILS

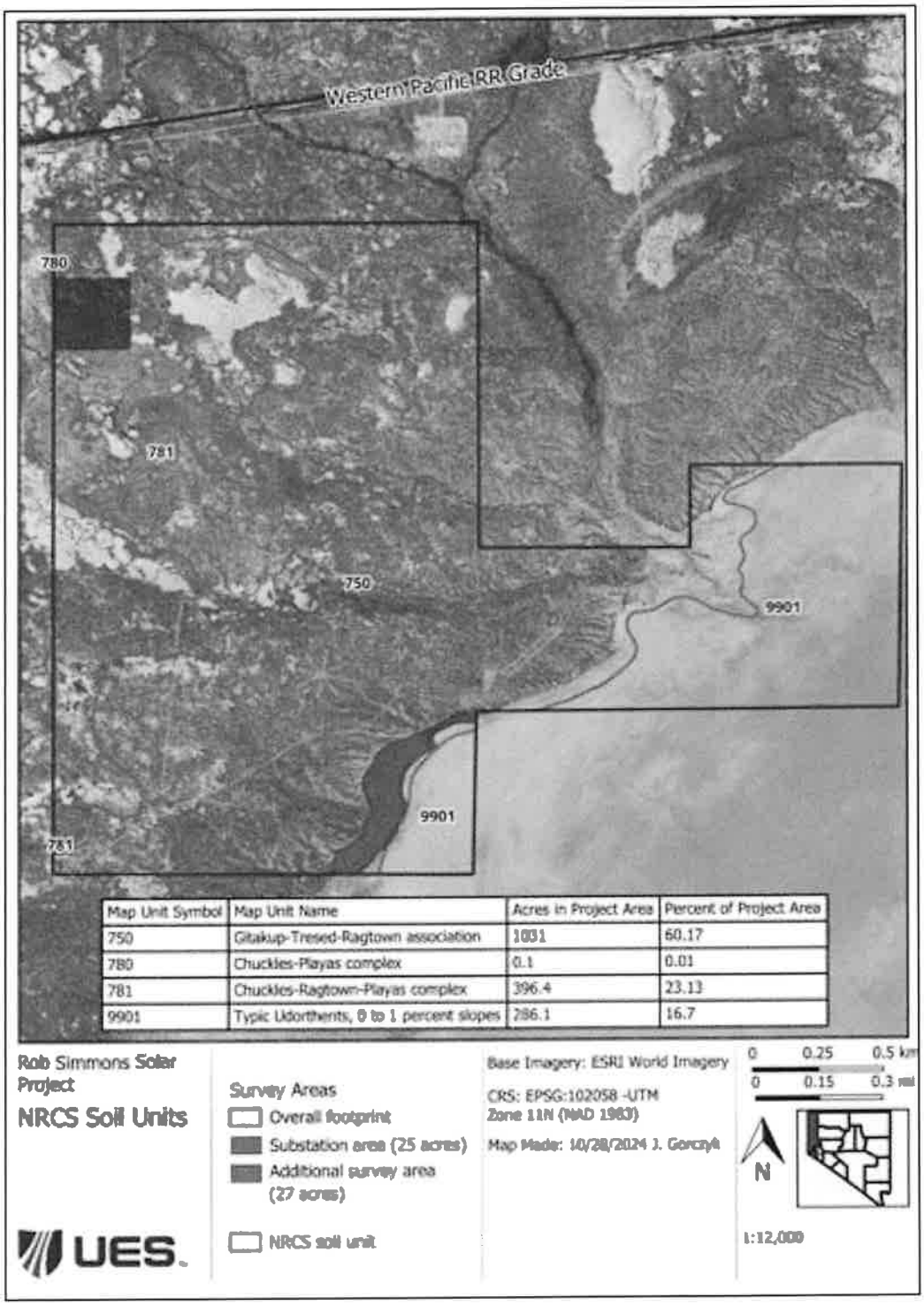
A total of four Natural Resources Conservation Services (NRCS) mapped soil units were identified within the project area (Table 1, Figure 3). The majority of the soil series are moderately well-drained loams or silty loams characteristic of lakebeds and lagoons. The 25-acre Phase I survey area contains only one of these types of soils, the Chuckles-Ragtown-Playas complex.

Table 1. NRCS Soil Units in the Simmons Solar Project Boundary.

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
750	Gitakup-Tresed-Ragtown association	1031	60.17
780	Chuckles-Playas complex	0.1	0.01
781	Chuckles-Ragtown-Playas complex	396.4	23.13
9901	Typic Udorthents, 0 to 1 percent slopes	286.1	16.70

2.3 HYDROLOGY

There are no perennial water sources in the project area. Rather, a series of braided streams and washes extend down from higher elevations in the mountains to the south and northeast of the project area. These ephemeral drainages are visible as dry, braided rivulets across the general landscape. A large pluvial lake is situated along the southeast portion of the subject property but was dry at the time of the archaeological inventory/pedestrian survey (October 22-23, 2024). The Simmons Solar project area lies approximately 12 miles west of Pyramid Lake.



Map Unit Symbol	Map Unit Name	Acres in Project Area	Percent of Project Area
750	Gitakup-Tresed-Ragtown association	1031	60.17
780	Chuckles-Playas complex	0.1	0.01
781	Chuckles-Ragtown-Playas complex	396.4	23.13
9901	Typic Udorthents, 0 to 1 percent slopes	286.1	16.7

Figure 3. NRCS soil map of the project area.

2.4 PALEOENVIRONMENT

During the terminal Pleistocene, the Great Basin was covered by numerous pluvial lakes, lakes whose water levels fluctuated through processes of precipitation (including snow melt) and evaporation. In basins where no permanent lakes existed, increased precipitation led to the creation of seasonal lakes, as exist today. However, during the Late Pleistocene, the acreage of pluvial lakes within the Great Basin was eleven times greater than it is today, with approximately 27.86 million acres of lakes (Grayson 2011).

The current project area lies within the Honey Lake Valley, a closed basin (endorheic sink) that straddles the California/ Nevada border. On the California side, Honey Lake is an important wetland habitat supporting numerous species of alkali-tolerant flora and wetland fauna, especially birds. On the Nevada side, the valley is comprised of a series of relict playas and does not support wetland habitats. The Honey Lake Valley itself, fed by the Susan River, was once part of one of the largest of the Pleistocene pluvial lakes, Lake Lahontan. Lake Lahontan, as with other pluvial lakes, experienced periods of expansion and contraction, with lake levels rising and falling throughout the Pleistocene (Grayson 2011). During both the maximum Pleistocene extent of Lake Lahontan and its contracted form during the Late Pleistocene, it covered the entire project area (Reheis 1999; Figure 4).

Several lines of proxy climate data, including vegetation, glaciers, and invertebrate taxa, have demonstrated that mean annual temperatures during the Pleistocene were anywhere from 10-16°F cooler than at present (Grayson 2011). Cooler temperatures supported diverse Pleistocene biotic communities. Macrobotanical analysis from plant remains recovered in packrat middens and palynological data together present a picture of Late Pleistocene vegetation where Utah juniper (*Juniperus osteosperma*) was widely distributed at elevations much lower than today, including along the western shorelines of Lake Lahontan. Sagebrush was common throughout, with sagebrush-grass prairies in certain parts of the Great Basin such as the Ruby Valley (Grayson 2011). Late Pleistocene vertebrate fauna in the Great Basin included many of those commonly found elsewhere in North America: of the 36 now extinct Pleistocene fauna, 20 of them have been identified from fossils within the Great Basin, including ground sloths, equids, two of the three proboscidean species, and many more. As the climate warmed and became more arid during the onset of the Holocene, those species that did not go extinct would have left the vicinity of the project area as the lake evaporated.

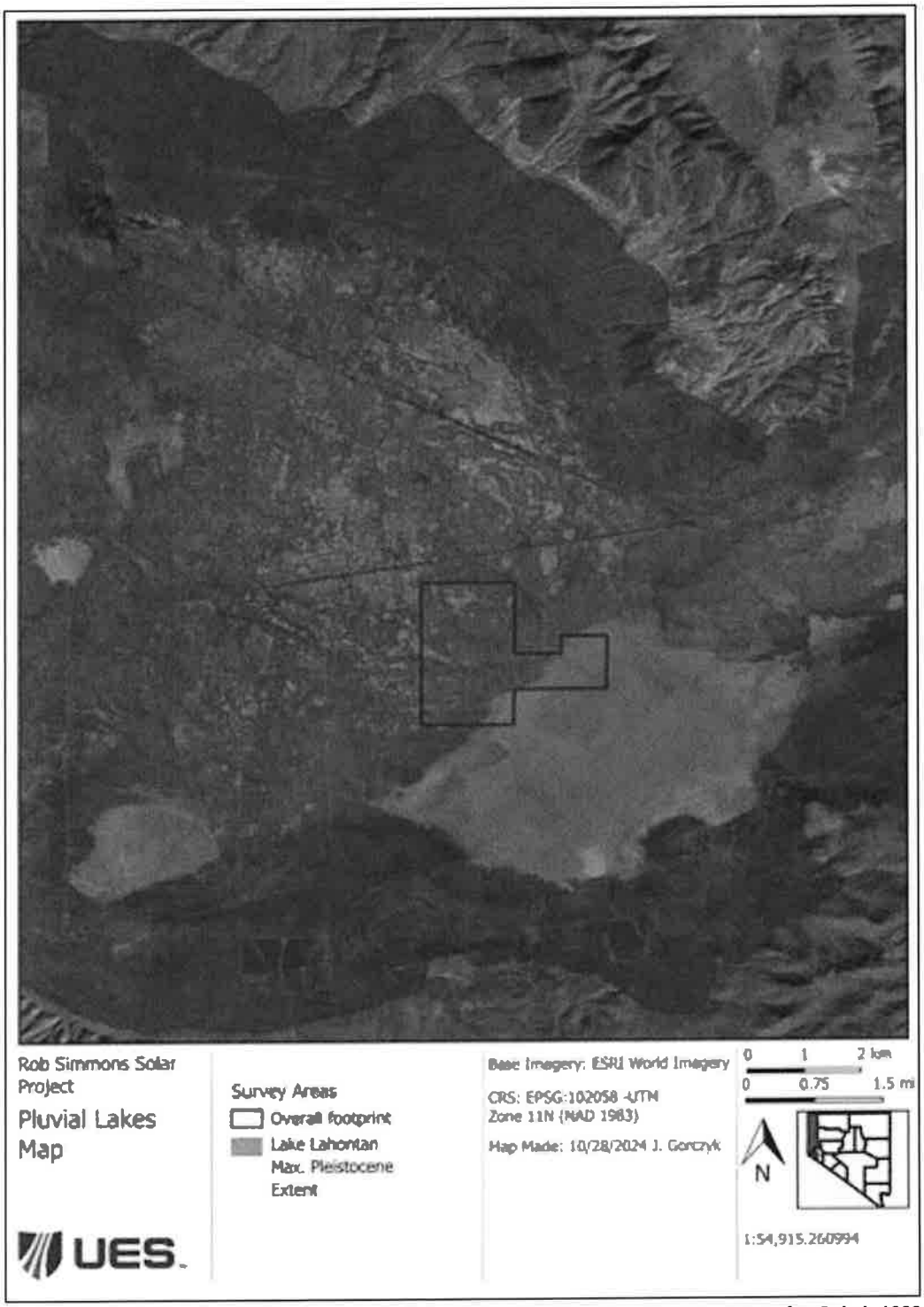


Figure 4. The extent of Pleistocene Lake Lahontan in relation to Simmons Solar project area. After Reheis 1999.

2.4.1 Coppice Dunes (nabkhas)

The southern and eastern margins of the Simmons Solar project area are characterized by a series of coppice dune features (commonly referred to as nabkhas) and flat, interdune spaces on the edges of the playa. Over time, these features 'migrate', contributing to a highly dynamic environment surrounding the playa that exerts a direct effect on the integrity of nearby archaeological sites, including those that comprise the archaeological district discussed below. What follows is a brief discussion of coppice dune formation, deflation, and migration that will serve to demonstrate how these unique features affect the integrity of archaeological resources.

Coppice dune formation is a combination of geomorphic, ecological, and hydrological processes, although the interaction between these two forces is still largely unstudied (Li and Ravi 2018). Coppice dunes form as wind-blown sediment becomes trapped around vegetation such as mesquite, creosote, or saltbush, building up a dune through processes of creep, saltation, and suspension. In semi-arid environments, these sediments may be sufficiently nutrient-rich to encourage additional vegetation to grow on the tops and sides of the dunes. However, hydrological processes, such as sediment-laden runoff, may also accumulate around the base of the dunes, depositing additional nutrient-rich sediments. Dune migration occurs as sediment on the upwind side of the dune is carried over and deposited on the downwind side, by the same mechanisms that operate on the upwind side of the dune (Li and Ravi 2018:22, Figure 5). In conjunction with sediment runoff from seasonal rains, which can carry sediments downslope from the top of the dune, the dune eventually 'migrates'. This ultimately has a deleterious effect on the dune and the process of migrating also typically leads to dune deflation and eventually elimination. Studies have shown that if nothing intervenes to stop dune erosion, the dunes will eventually deflate entirely and leave a hardpan (Langford 2000).

The formation, migration, and deflation of dunes has clear effects on archaeological sites, especially those that were deposited prior to the formation of the dunes. In the Honey Lake playa, the formation of the coppice dunes was a result of increased aridification, likely after humans had stopped using the lake littoral for resource gathering. Therefore, archaeological sites may be heavily impacted by the aeolian processes involved in dune formation and migration. Such forces must be taken into consideration when evaluating the potential for subsurface cultural materials and the integrity of archaeological sites, especially their location.

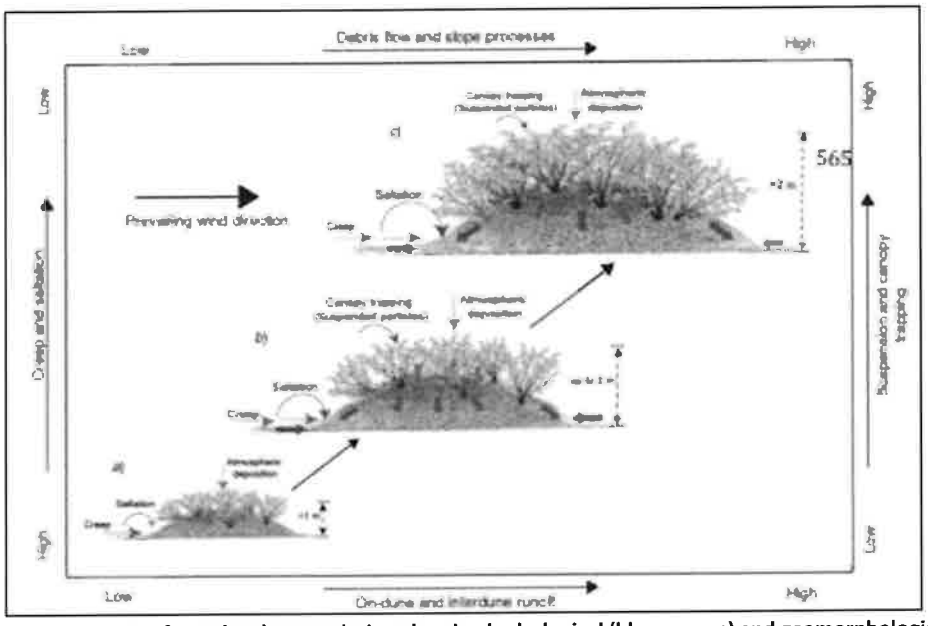


Figure 5. Diagram of coppice dune evolution showing hydrological (blue arrows) and geomorphological (red and green arrows) processes. From Li and Ravi 2018:23, Figure 8.

3.0 HISTORIC CONTEXT

The significance of resources in the project area should be evaluated within a regionally relevant framework or context when determining their relative significance to the NRHP at the local, regional, and worldwide level (Hardesty and Little 2009; National Park Service [NPS] 1995:7). Historic contexts are "those patterns, themes, or trends in history by which a specific occurrence, property, or site is understood and its historic meaning (and ultimately its significance) is made clear" (Little et al. 2000:14). Historic contexts are synthesized from available historic and archaeological information and are tailored to the needs of a specific project through consideration of thematic, chronological, and geographic boundaries (Hardesty and Little 2009:19–20). When evaluating the significance of an archaeological site or historic property it should not only include diagnostic artifacts or features that can link its temporal association with the local context but also task specific data that clearly identifies a site or component's specific land use activity or related research theme (NPS 1995:22).

A proper evaluation of a property's significance must be based on the four Criteria (A, B, C, or D). When discussing NRHP eligibility under Criterion D, a site must be able to address specific research questions relevant to the local historic context (BLM 2021). NRHP eligibility recommendations were developed using those aspects of the historic context appropriate to the cultural resources identified during the inventory. Cultural resources were examined to determine significance based on property type, resources present, integrity, and association with time, space, and themes important to local, state, or national history. A "property is not eligible if it cannot be related to a particular time period or cultural group and, as a result, lacks any historic context within which to evaluate the importance of the information to be gained" (NPS 1995:22). Guidelines provided in the NR Bulletin 15 (NPS 1995) stipulate that properties must, as a rule,

be at least 50 years old and meet requirements for site significance for listing on the NR under at least one of the following criteria:

Criterion A: Strongly associated with historical events, patterns, or themes important in local, state, or national history.

Criterion B: Strongly associated with persons important in local, state, or national history.

Criterion C: Provide good illustrations of distinctive architectural, engineering, or landscape designs, patterns, styles, or types.

Criterion D: Provide information needed to answer important scientific or scholarly research questions.

Not only should a significant property have an important association with historic trends, but it must also retain its historic integrity. An evaluation of integrity must be grounded in an understanding of the property's physical features and how they relate to its significance (NPS 1995:44). A site's key features must retain their integrity to convey its significance. It is important that the significant data contained in the property be preserved or present to address important information relevant to a property's significance (NPS 1995:23). The NPS (1995) defines seven aspects to integrity including location, design, setting, materials, workmanship, feeling, and association. For a property to retain historical integrity, it should meet at least a few of these aspects.

Location: The construction place of the historic property or place where the historic event occurred. Location helps in understanding the "why" of a construction or an event.

Design: The result of the conception and planning that created the form, plan, space, structure, technology, scale, materials, functions, aesthetics, and style of a property.

Setting: The character of the physical environment of a historic property. Setting, or how the property is situated, includes topographic features, vegetation, cultural features, relationships between features, and open space.

Materials: The combination of physical elements that were used to create a historic property during a particular period in a particular pattern. The property must retain actual historic resources dating from the period of its significance.

Workmanship: The evidence of artisans' labor and skill of a particular culture or people in creating a property during any given period in history or prehistory.

Feeling: The presence of physical features that express the aesthetic or historic sense of a particular period of time.

Association: The direct link between an important historic event or person and a historic property.

A property that retains integrity may possess several of the seven aspects, as well as the essential features that define why a property is significant and when it was significant. Archaeological sites eligible under Criteria A and B must retain excellent preservation of features, artifacts, and spatial relationships to convey important associations with events or persons. For Criterion C, sites must retain the majority of features to illustrate a site type, period, method of construction, or work of a master. Overall condition is less important under Criterion D in which integrity is based upon the property's data potential, as shown by intact or identifiable relationships among artifacts, features, and other elements of the site.

3.1 PREHISTORY

Evaluating precontact properties in the Great Basin is made difficult by several factors. First, the lack of textual sources makes it difficult to flesh out historic contexts relevant to precontact resources. Second, the relative scarcity of chronometric datasets and stratified deposits complicates the study of diachronic patterns in human behavior because most resources are recorded as surface-level finds, many of which represent palimpsests of human activity. Finally, the mobile nature of Great Basin precontact groups leaves few architectural traces in the archaeological record. When present, subsurface features are not always obvious during pedestrian survey and can easily be overlooked. Due to these issues, most precontact sites cannot be evaluated under Criteria A, B, or C and typically fall under Criterion D for their potential to yield information important to prehistory. To be eligible under this criterion, temporally diagnostic artifacts such as projectile points or other chronometric datasets (i.e., samples for radiocarbon dating) must be present. With regards to the latter, subsurface deposits are usually necessary for the site to preserve its integrity. If precontact properties do convey their significance, they typically address one of three research themes: chronology, land use, and trade and exchange. Tribal consultation is often a crucial component to assessing whether a site may be eligible under criterion D, as affiliated tribes provide information unknown to archaeologists about how an artifact or artifact assemblage is important to the past.

3.1.1 Chronology

Chronological sequences are foundational to an archaeological understanding of past human behavior. Chronometric datasets are necessary to address important issues relating to demographic and technological change and adaptations to shifting local environments. The lack of a high-resolution chronology for the area of the Honey Valley—and the Great Basin as a whole—makes it difficult to identify diachronic trends in human behavior, specifically with regards to the occupation of areas adjacent to pluvial lakes near the project area. Unknowns in the chronology include whether occupations were concentrated on the shores of the Honey Lake Valley were mostly abandoned following the Paleoarchaic

period (Pendleton 1978:22). The APE is situated on the easternmost end of the Honey Lake Valley, on a remnant Pleistocene Lake that was itself originally part of Lake Lahontan. Therefore, the potential for cultural materials within the APE to answer local and regional chronological questions cannot be overstated.

Within the western Great Basin, two large-scale chronological research questions remain unresolved including: 1) the nature of the Pleistocene/early Holocene transition; 2) the timing of the appearance of early Archaic Elko and Gatecliff series points within the eastern and western Great Basin. The Pleistocene/Holocene tradition in the Great Basin is complicated by the continued use of the same artifact types (i.e., fluted and stemmed points) both before and after the transition. For this reason, archaeologists prefer the term Paleo-Archaic to refer to this transitional period. A similar problem persists during the later Archaic, where again diagnostic projectile point forms such as the early Archaic side notched points, Gatecliff and Pinto points, have continued use into the Middle Archaic and are not well represented in the archaeological record. This issue is of national relevance as the early Holocene is poorly understood in nearly all regions of North America.

Projectile Points

Projectile point seriation is an accepted method for establishing a relative chronological sequence within the Great Basin (e.g., Beck and Jones 1997; Hockett 1995) and is often used to investigate the Late Pleistocene/Early Holocene transition as well as the arrival of Middle Archaic points into the Great Basin. Thomas (1981) provided a detailed seriation of point types, dividing them into four major categories—Gatecliff, Elko, Rosegate, and Desert side-notched— the sequence was developed specifically for central Nevada (Grayson 2011:309). Bryan Hockett (1995:41–43) has shown that these archaic projectile point forms likely appeared as much as 5,000 years earlier in the eastern Great Basin, diffusing to the western area much later. Identifying these forms in the landscape is an important step in refining this relative sequence, but equally important is the material itself, which through sourcing and (if applicable) obsidian-hydration dating can substantiate the theory of east-west diffusion.

Research Questions and Data Requirements

To assess a site's ability to answer chronological questions, datable materials need to be present. This could include obsidian artifacts or deposits of organic material that can be radiocarbon dated. Such materials are crucial to answering questions of site (re)occupation or temporally circumscribed activity areas. The lack of chronometric data for small non-diagnostic lithic scatters makes it impossible to place a site's prehistoric occupation within any of the regional periods. However, all too often sites contain additional buried deposits in the form of artifacts and potential thermal features that could address chronology. In this instance, the site retains additional information potential or integrity in the form of buried deposits and evaluated under Criterion D. For a site to be considered eligible, it should have the potential to refine local diagnostic projectile point sequences and be able to address important chronological research issues for the area. Such deposits can be observed in the field as charcoal stains on the surface with an association with artifacts. For such a site to be eligible under this criterion, it would need to possess important chronometric information and answer at least one of the following research questions:

1.) *Do subsurface deposits, such as hearths, pits, or other features containing diagnostic artifacts or datable materials exist that could provide independent verification or refinement of existing chronological sequences?*

2.) *Does the site contain sufficient obsidian artifacts that could be used in obsidian-hydration dating techniques that could provide independent verification or refinement of existing chronological sequences?*

A site cannot be merely associated with diagnostic artifacts to be eligible under Criterion D. It must also contain secondary information that can be used to independently verify relative chronologies. Ideally, a site would contain a deposit of datable materials in close association with temporally diagnostic artifacts, such as projectile points, to answer the important chronological research questions of the Great Basin.

3.1.2 Land Use

Land use is a broad category that encompasses numerous aspects including subsistence, material procurement, settlement, and more. Great Basin archaeology relies heavily on Lewis Binford's (1980) model of hunter gatherer land use systems, which assumes a direct relationship between landscape features and resource locations. In modern landscape archaeology, this most closely resembles a place-based approach that focuses on the localized patterns of site use while not losing sight of the material, social, and symbolic networks that link places within the landscape. Among hunter gatherers, land use systems are complex, tied to shifting resource distributions, ancestral claims to land use, and patterns of demographic change and mobility. Typical site types identified by Binford and used in Great Basin archaeology include base camps, satellite sites, and short-term seasonal encampments for temporary extraction/processing of resources.

Clearly, in this understanding of land use patterns, subsistence plays a key role in determining the location of various site types throughout the year. However, little direct data for subsistence exists in the Great Basin. As most of the finds are surface finds, datasets such as faunal or archaeobotanical remains or human remains that could be used for biochemical analysis of diet, tend not to preserve. Most of the evidence for precontact subsistence comes in indirect forms such as projectile points, groundstone artifacts, and ceramics.

Land Use Property Types

Land use property types include a variety of site types, ranging from small lithic scatters to stratified open sites containing both artifacts and features to complex sites containing artifacts and features that have built up over time. Property types are dependent on the nature of site use within the landscape. Satellite sites, for instance, may be short-lived, ephemeral occupations associated with resource procurement and/or processing. Base camps and habitation sites are more complex, a function of the prolonged depositional histories associated with remaining in place for longer periods. Such sites not only contain a greater number of features but also a greater variety of activity areas. Common site types to be expected include: (1) quarry; (2) tool production or maintenance, (3) hunting or butcher site; (4) vegetal procurement; (5) a base camp; (6) burial sites and other sacred locations; or (7) habitation site where a range of repetitive activities are often represented.

The identification of site types is only the first step in understanding their function with land use patterns. The frequency and location of site types within the larger region must also be considered so that individual sites can be contextualized and understood diachronically. This approach is also an important step in mitigating potential biases in site evaluation when individual sites are considered in isolation of the larger network of site types within the larger region (Hardesty and Little 2009:34).

Research Questions and Data Requirements

To answer questions about land use, a site must contain task specific artifacts or tools and or features with chronological indicators. A site must have a chronological placement to be identified to a specific prehistoric period and be directly compared to the occupation of other sites in the region with temporal associations. Eligible sites under this research domain must answer the first (and ideally, one or more of the others) of the following research questions:

1.) *Are specific task areas identifiable at the site, evident in the type of artifacts or features present, that can contribute to an understanding of local land use strategies by offering new or additional data for the regional precontact sequence?*

2.) *Does the site contain local materials or materials that can be sourced, yielding information on procurement strategies? If so, can changing mobility strategies be identified by the comparison of local and non-local stone sources?*

3.) *Is a sufficient sample size of obsidian artifacts present that would facilitate hydration analysis used to identify changing mobility strategies over time?*

4.) *Can spatial patterning be identified in the distribution of features or artifact concentrations, which might speak to the delineation of sites into activity areas? If subsurface features are present, do they contain evidence of structured deposition (Richards and Thomas 1984) that could yield important information on depositional or ceremonial behavior?*

The variety of tool types within the assemblage can offer data about the types of activities and resources targeted while subsistence activities can be identified directly from floral and faunal remains obtained from cultural features. Sites with large, moderate, and small assemblages containing at least one tool and debitage are needed, as are sites containing obsidian artifacts, especially projectile points, suitable for sourcing studies. Quarry sites should include the presence of lithic raw material as well as the presence of cores, early-stage reduction, and broken blanks or bifaces being shaped for transport. Sites containing groundstone, hunting blinds, tools or pinyon caches, or spatial patterning would also help address questions associated with land use patterns, particularly with subsistence. For a site to be identified as a base camp or habitation site it must contain evidence for structures or other features typical of a base camp or built-up environment such as fire hearths, midden deposits, or large concentrations of artifacts. Sites may also have evidence for spatial patterning suggesting a wider range of activities to have taken place at the location over a length of time to establish some sort of permanence on the landscape.

Sourcing data in conjunction with the identification of lithic technology, including relative stages of reduction for material types is also important to our understanding of mobility patterns and changes over time. A high degree of use of localized material sources would suggest more limited mobility whereas the presence of exotic materials from more distant sources tends to be more reduced and curated. Local materials usage can be identified by the presence of quarry sites with lithic raw material. Material type assemblages that are characterized by early-stage reduction techniques typically occur in close proximity to sources. The closest documented obsidian sources are approximately 18 miles from the direct APE at Crow Spring in the Monte Cristo Range, at Cave Spring and Silver Peak approximately 14 miles away, and approximately 30 miles away in the Montezuma Range (Northwest Research Obsidian Studies Laboratory 2022).

3.1.3 Trade and Exchange

This research theme relates to the presence of networks of trade and communication between the various regions of the Great Basin and beyond. Great Basin groups appear to have mostly participated in local exchange networks, evidenced by the fact that most materials recovered by archaeologists are of local sourcing or manufacture. Thus, the most frequent type of exchange was likely inter-valley exchange with groups living relatively close by. This may have been especially true for the exchange of lithic raw materials and may be represented in even small lithic scatters by materials sourced from one or more non-local sources. Nevertheless, trade goods from outside the Great Basin are sometimes encountered, including marine shell objects from the Pacific Coast, turquoise from Arizona, and later, Ancestral Puebloan ceramics.

In addition to sourcing materials with obvious extra-regional origins (such as Pacific marine shells), the most common way that Great Basin archaeologists investigate trade and exchange is by identifying tool material sources such as chert or obsidian. Material sourcing for stone tools was discussed above in the Land Use section, but its relevance to trade and exchange is discussed here. Studies of tool transport suggest that as tool materials travel away from their sources, a corresponding increase in late-stage lithic reduction practices and a decrease in overall tool size are common. Examining tool use stage and size is often the only way to examine issues of trade and exchange within the Great Basin, as sites most commonly consist of lithic debitage and stone tools. Tool material sourcing is not, however, the best method for investigating exchange, as it is not always clear whether resources were traded within a precontact group's territory or between territories, which often speaks more directly to patterns of residential mobility.

Data Requirements

To be eligible under this research theme, a site must contain artifacts of exotic origin, meaning they originated outside of the occupant' traditional territory. Without knowing the full extent of a group's pattern of mobility, this can be difficult, but some materials, such as marine shell beads and certain types of ceramics, clearly originated from outside the Great Basin and likely represent far-flung exchange networks. To be eligible, a site must address one of the following trade and exchange research questions:

1.) *Are exotic materials, as defined above, present at the site?*

2.) *Does the stone material used for making tools come from outside the traditional territory of the group in question. Are lithic materials identifiable as local or non-local?*

3.2 Evaluation of Precontact Property Types

Due to the lack of written sources and the ephemeral nature of most Great Basin precontact sites, these property types are rarely, if ever, evaluated under Criteria A, B, or C. Instead, they are typically evaluated under Criterion D for their potential to yield information valuable to prehistory.

Criterion A: A site would be potentially eligible under this criterion if it could make a significant contribution to our understanding of an important transitional period, for example, a site that represents the introduction of dart points during the Paleoarchaic-Archaic transition or represent the first known use of a diagnostic artifact type.

Criterion B: A precontact site would not be eligible under this criterion, because there is no data class or property type that could link the site to an important individual.

Criterion C: A precontact property could be eligible under this criterion if sufficient architectural or engineering features, for example, dwellings (subterranean or above-ground), irrigation features or hunting features were present.

Criterion D: Most precontact sites are eligible under Criterion D because they lack sufficient data to be evaluated under Criteria A-C. Nevertheless, they can still have the potential to yield information important to prehistory. To be eligible under this criterion, a property would have to answer some or all of the research questions associated with a particular historic context as described above.

3.3 HISTORIC PERIOD CONTEXT

3.3.1 Mining

No mining features were identified during the Class III survey, and the Simmons project area is unlikely to contain them given its location away from the foothills where mining districts were centered. Nevertheless, since the Class III survey for Phase 1 of the project only covered approximately 50 acres of the entire footprint, it is still possible that mining features could be present in the unsurveyed portion of the parcel. If they are, they sould be evaluated according to the following historic context.

In broad chronological terms, a historic mining context should encompass all phases of the mining process from initial discovery to abandonment and should consider that mining properties may contain features from several different phases. The evaluation of potential historic mining properties was done using guidelines set forth in the National Register Bulletin on registering mining properties (Noble and Spude 1997), with refinements using Little et al. (2000), Costello et al. (2008), and Hardesty's (2001, 2010) refinements for the state of Nevada. Three main phases of mining production help define the property types likely to be encountered during survey: extraction, beneficiation, and refining (Noble and Spude 1997:9–13). Many large-scale mine sites kept facilities used for beneficiation and refining close by the extraction site to reduce expenses. Beneficiation involves increasing the value of the extracted ore, making it ready for the refining process and can involve mechanical treatment through crushing, screening, and floating to chemical treatment (Costello et al. 2008:97; Hardesty 2010:64; Noble and Spude 1997:12). Refining is the process of converting ore into a form usable by manufacturers or commercial entities. For the Silver Peak Mining District, beneficiation would be associated with the use of mills and other facilities set up in the town of Blair.

The following discussion identifies property types and research issues specific to the resources identified within the current APE. Property types attributed to beneficiation and refining were not present within the APE. Although the project area is located only 10 miles north of the main workings of the Silver Peak Mining District, the archival research performed during the literature review (see Section 5.0) did not indicate that the area of the direct APE saw significant mining activities that would leave evidence of large numbers of mining properties behind. Nevertheless, extraction related resources were observed within the north half of Township 1 North, Range 38 East including mining claims markers, prospect pits, and domestic trash scatters. Domestic trash scatters identified within the APE were likely in support of prospecting in the area. Costello et al. (2008) identifies typical property types and important research themes associated with mining technology and ancillary properties. Hardesty (2001; 2010) defines in

depth the different types of mining-related and ancillary property types associated with hard rock mining in Central Nevada.

Extraction

Property types associated with mine extraction sites can be classified in two categories reflecting the evolution of a mine, including mine exploration property types such as claim markers and prospecting pits and mine development or exploitation of a property (Noble and Spude 1997:10). Exploration is associated with discovery posts, cairns, claim papers in tobacco cans, hand-dug prospect pits, power-shovel trenches, bulldozer cuts, and drill holes related to mine exploration. Property types associated with the extraction of an ore body include the remains of hoisting works such as head frames and hoist engines, portals, shafts, audits, ventilation, steam boilers or electric generator houses, drainage and water delivery systems, ore bins or cart tracks, waste rock dumps, tailings, bulldozer cuts, trash dumps, and ancillary features and structures. Just as important to a mining system of extraction ancillary related features can include maintenance and administrative facilities such as blacksmith shops, dyehouses, sawmills for reinforcing mine shafts, assay laboratories, offices, worker's housing, domestic debris, and any other facilities as part of a mining system. Diagnostic tools associated with simple mine related extraction typically include prospecting tools such as picks, bars, shovels, and or dynamite, and in larger operations, roads, wheelbarrows, and ore cars to move ore and waste rock.

3.3.2 Evaluation of Mining Property Types

The mining and mineral exploration context and research design developed above serves as a framework for considering the research potential of mining-related properties and their listing to the NRHP. The NR provides criteria and guidelines for evaluating the significance of historical mining properties (Noble and Spude 1997). According to the established NR criteria, mining properties are significant if they are (a) associated with historical events, patterns, or themes important in local, state, or national history; (b) associated with persons important in local, state, or national history; (c) embody the distinctive characteristics of a type, period, or method of construction; or (d) have yielded or are likely to yield information needed to answer important scientific or scholarly research questions.

Criterion A: To be eligible under Criterion A, a mining property may qualify through its connection with historic themes (laid out in the National Register bulletin and summarized by Noble and Spude 1997, 15).

Criterion B: To be eligible under Criterion B, a mining property would be significant if it were directly related to a historically significant person, e.g., Herbert Hoover's mine engineering career before he entered politics.

Criterion C: To be eligible under Criterion C, a mining property should embody "the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction."

Criterion D: To be eligible under Criterion D, a mining property should have already yielded, or be likely to yield, information important to prehistory or history. The application of Criterion D to mining properties requires one to lay out the research questions the resource is likely to answer and the information required to answer them (Noble and Spude 1997, 17).

Research Themes and Issues

An economic research theme is dominant in local context development and evaluation of site significance for Nevada (Hardesty 2001). Hardesty (2001:10) suggests six research themes that best illustrate and interpret the mining history of the Central Nevada Ecounit including: political economy; mining technology; transforming environments; peopling places; social formations, lifestyles, and cultures; and social institutions and movements. The research themes most relevant to the historic industrial resources within the current APE are political economy, and mining technology. A proper evaluation of site significance is often tied to its period of significance when the residential structures were incorporated in a mining district and the prospecting and the development of significant bodies of ore took place (Hardesty 2010:29–107; Noble and Spude 1997:17).

According to Noble and Spude (1997:17) mining related research questions should reference variability and change in mining technology and mining landscapes. Mining-related resources have the potential to answer questions about activity patterns, boom-and-bust cycles, technological adaptations, and community development (Martinez et al. 2012:26). For a mining or mining ancillary related site to be considered eligible under Criterion D, it must relate to a period of significance and retain addition research value that can address significance research themes and issues identified for the district that could help fulfill gaps in the known regional context (Noble and Spude 1997:17).

1.) Is temporal variation evident within loci or features?

2.) What level of technology is represented at the property and is it the latest or most advanced technology or equipment available at the time?

3.) Is there evidence that operators or workers lived near a mine or mill, such as tent flats, dugouts, or structures forming an interconnected system or mining related landscape?

4.) Is there evidence of innovation?

5.) Are the technologies older than those commonly employed during the period that the site was active?

6.) Is there evidence for changes in mining processes through time at the site?

7.) Is there archival information available that can directly link properties to important people in the local or national history?

3.3.3 Transportation

This research theme includes systems associated with the long-distance transport of people or commodities between different regions or communities. Some of the more common transportation related subthemes in the state of Nevada include trails, roads, and railways. Shorter routes such as driveways, turnouts, ore tracks, ranching field roads, short paths, etc. are considered a feature of a site and are assessed as property types under the site's particular research theme such as mining or agriculture. The routes of historic trails, wagon routes, roads, and railroads may be accurately identified through a combination of archival research using primary sources, such as overland travel journals and diaries, and archaeological investigation of the trail corridors.

Evidence of transportation systems may consist of all components relating to their construction, use, and abandonment. These include roads, tracks, or traces showing rudimentary construction, road cuts, rock retaining walls, culverts, bridges or fords, temporary construction and/or maintenance camps, abandoned

construction equipment, and roadside dumps and debris. Abandoned segments may provide information about the maintenance of the route. Segments with associated debris that can help denote the primary and secondary uses of the route would help address these questions. The debris may indicate types of products transported along the route, the modes of transportation (wagon versus automobile), and whether the route was strictly used for a solitary purpose, such as accessing a mine, or if a variety of travelers used the route as an opportunity to gain access to other areas. Artifact assemblages with datable material fitting into a tight time frame would also help define when the route was traveled and if its use changed over time. Evidence of stations, campsites, or other stopping points could also provide information on the use of the transportation system.

Linear historic resources often consist of noncontiguous portions of a transportation route missing segments due to modernization in certain areas of the resource. As such, linear resources are often treated as historic districts with recorded segments evaluated as contributing or non-contributing depending on historic association, age, and integrity (Hardesty and Little 2009:99-100). Many portions of a historic route may be missing, or integrity severely altered due to modernization of certain areas along the route. Typically, only sections of a road railroad or trail within a proposed APE are inspected and by itself may not meet significance criteria and be considered as a contributing or non-contributing component of the larger site or district.

Historic Trails/Wagon Roads

There are two different types of wagon roads: non-formal roads and formally prepared road systems operated as toll roads or stage and freight routes (Bowers and Muessig 1982:71–75). Non-formal wagon roads were not prepared but developed out of repeated use of a trail and is a characteristic of many early emigrant trails such as the Mormon Trail. It was simply a way to get from point A to point B and was usually the easiest route. Formally prepared roads such as toll roads and stage and freight routes were designed, built, and maintained by freight companies and were typically formally prepared, maintained and had way stations in route. The system associated with a wagon road may include ancillary or related sites and features such as: (1) roadside debris scatters, (2) campsites, (3) road cuts, (4) retaining walls, (5) bridges, (6) way stations, (7) ranches, and (8) towns (Murphy 1996). The system of ancillary properties is more common for formally prepared routes.

Trails/Wagon Roads Evaluation

A transportation feature is a linear feature and should be evaluated as a historic district under Criteria A and B with the recorded segment evaluated under Criteria C and D as a contributing or non-contributing segment. Sections of a wagon road are typically inspected within the limits of a project area and may not meet significance criteria on their own and are considered as a contributing or non-contributing component of a larger site or district. Below is a breakdown of relative criteria of significance for wagon roads.

Criterion A: To be eligible for listing under Criterion A, the transportation resource must have an important association with one or more events important in the defined historic context.

Criterion B: For a transportation resource to be eligible under Criterion B it should be associated with a person "significant to our past" (NPS 1995, 14). This criterion is generally restricted to those resources that illustrate (rather than commemorate) a person's achievements.

Criterion C: A transportation resource should embody the distinctive characteristics of a type, period, or method of construction, including individual features more appropriately considered as contributing elements to the overall transportation feature.

Criterion D: To satisfy Criterion D, a transportation corridor should have already yielded, or be likely to yield, information important to our history. As with mining, clear research questions and their associated data requirements must be outlined to evaluate a resources significance under Criterion D.

Research Questions and Data Needs:

Kolvet et al. (1998:51) and Murphy (1996:17-18) have developed a systematic approach to assist in the assessment of properties relating to wagon roads. The approach includes questions pertaining to construction and maintenance, route use, and the economic importance of the transportation route. For a recorded segment of a wagon road to be considered eligible it must be able to address at least the first two of the following research questions.

1. *Do old unaltered sections of the wagon road exist?*
2. *Do artifacts along the wagon road correspond to the periods of significance for the route?*
3. *Are there physical characteristics associated with the transportation system that could provide information concerning its construction and maintenance?*
4. *What materials and techniques were used to build and maintain the system?*
5. *Are there work camps en route that are able to inform us about construction techniques and the workforce employed for construction and maintenance?*
6. *Is there roadside debris that can answer questions about use of the road or habits of the travelers?*
7. *Is there evidence regarding the kinds of products and merchandise transported?*

Assessing Integrity

For a transportation corridor to retain integrity it should retain three characteristics including: (1) the level of disturbance (i.e., modern alterations or significant erosion) must not be so great that it has removed aspects of the resource's integrity, (2) its original location, morphology, profile, and design elements, and (3) those features associated with the design or original function of the feature and their original form and appearance (Hardesty and Little 2009:86-87).

4.0 CULTURAL SETTING

Archaeologists divide the Great Basin into a series of geographic sub-areas that sometimes represent the focus of past research rather than observed differences in artifact inventories and adaptations to local environments (Jennings 1986). The project APE can be found within the western subarea of the Great Basin, which includes parts of California along the Sierra Nevada and most of the State of Nevada (Elston 1986). The western subarea can be further divided into three sub-regions defined by differences in ecology and cultural history including the central sub-region, the Lahontan Basin, and the eastern slope of the Sierra Nevada. The APE is located within the Lahontan Basin Lyon County. The following precontact sequence reveals a changing adaptive strategy defined by five periods: Paleoarchaic, the Early, Middle and Late Archaic, and the Late Precontact periods (Beck et al. 2002; Beck and Jones 2008; Bischoff et al. 1999; Elston 1986; Hockett et al. 2008; Konoske et al. 2009).

4.1 PRECONTACT OVERVIEW

Archaeology as a study of the material past has roots in Western intellectual traditions and as such is a knowledge production exercise utilizing theories, methods, and assumptions derived from those traditions. Archaeological evidence suggests people have inhabited the Great Basin for at least 12,000 years. Far from being "peoples without history" (Wolf 1982), indigenous people in the Great Basin have knowledge and values regarding the past (and present) that are not included in typical scientific or archaeological studies. Indeed, while the current report is necessarily couched within the schema of current regulatory compliance, the perspectives and histories of descendant communities offer alternative, and oftentimes preferred, frameworks for understanding the past. While the goal of archaeological inquiry is to elucidate the past, sometimes this method is contradictory and offensive to the worldviews of descendant populations. This disconnect speaks to the critical need for cross-cultural collaboration and empowerment of the Native narrative throughout the regulatory process.

4.1.1 Paleoarchaic (13,100-7,700 cal. B.P.)

The period when people first arrived in the Great Basin is referred to as the Pre-Archaic, Paleoarchaic, or Paleoindian (13,000-8,300 before the present [B.P.]), which roughly corresponds to the Terminal Pleistocene/Early Holocene transition (TP/EH; Beck and Jones 1997; Haynes 2002). During the transition to the Early Holocene, effective moisture remained high. Floral and faunal communities were much different than today; many of the region's valleys are believed to have been very productive, though complete habitation of the region is not thought to have occurred until near the time of a series of large Mount Mazama eruptions (around 8,000 to 7,700 calibrated years before the present [cal. B.P.]), after which the region experienced the most severe warm and dry period of the Holocene.

The Paleoarchaic is characterized by a distinctive toolkit of large bifacial knives, crescents, scrapers, choppers, and both stemmed and concave (fluted) projectile points utilized by TP/EH hunters exploiting the margins of still-existing pluvial lakes (Elston 1986). This interpretation arose out of the preponderance of Paleoarchaic sites concentrated along remnant shorelines of pluvial lakes within the Great Basin, which led Bedwell to name it the Western Pluvial Lakes Tradition (Beck and Jones 2008). Further research (e.g., Burke et al. 2010; Fenner and Smith 2011, cited in Fenner 2011) has led to a greater identification of upland sites, suggesting that Paleoarchaic populations likely utilized a broader

range of environmental regions. Regardless, the marshy, lacustrine environments of TP/EH lakeshores provided fertile grounds for procurement of floral and faunal resources.

After many decades of work in the Great Basin, there is still little evidence to distinguish Late Pleistocene from Early Holocene occupations (Hockett et al. 2008). Both fluted and stemmed points occur in the Great Basin during the terminal Pleistocene with stemmed points persisting well into the middle Holocene for over a 4,000-year period making it difficult to distinguish many late Pleistocene Paleoindian sites with stemmed points from Early Holocene ones. Although fluted points occur in the Great Basin, they are rare (Grayson 2011), have yet to be dated directly, and often occur in association with stemmed points. Stemmed points are more common and perhaps slightly more recent with a wider geographical distribution occurring until the mid-Holocene.

Research using XRF analysis of Paleo-archaic projectile points within the western Great Basin have shown that pre-Holocene populations likely acquired lithic raw materials from one of two large foraging territories that span the current Nevada-California border, which were far more expansive than procurement zones of later populations (Smith 2010). Paleoarchaic groups may have procured lithic raw materials while on extended big-game hunting trips, as has been suggested by Hildebrant and McGuire (2005).

4.1.2 Early Archaic (8,500-4,500 cal. B.P.)

Local date ranges for the Early Archaic period are reliant upon projectile point types sequenced from Monitor Valley and Gatecliff Rock shelter by David Hearst Thomas, both quite far from the project area (Thomas 1981). The Archaic is marked by a significant increase in the region's temperatures and the continued drying of the region to its current hydrological conditions (Elston 1986:138). With significant changes in the environment, there was a major shift in the local adaptation strategy characterized by the appearance of dart points and groundstone in the archaeological record at this time (Beck and Jones 2008:45-48; Elston 1986:138-141). Atlatls (spear throwers) and dart points marked the advent of a major change in hunting technology and were the major tools utilized for hunting pronghorn and mountain sheep. This new projectile point technology is represented by Elko, Gatecliff or Pinto types and large side notched projectile points recovered from both residential base camps and larger field camps (Beck and Jones 2008; Justice 2002:125-148 & 173). Intensive use of seeds processed with groundstone mark major shifts in the exploitation of the region's resources.

Although there is little direct evidence concerning subsistence at this time, it is generally assumed inhabitants were focused on a broad-spectrum diet, a general lifeway that is believed to characterize North America as a whole, with few technological and subsistence changes for nearly a 10,000-year period (Beck and Jones 2008:45). Base camps are generally adjacent to more permanent water sources such as springs, rivers, or lakes, while temporary camps for hunting and gathering are found in upland, desert scrub regions (Elston 1986:138). It is possible that special task groups exploited these high regions primarily for hunting.

As elsewhere, evidence of the Early Archaic period within the Lahontan Basin sub-region of the western Great Basin is scarce. The local date ranges for the Early Archaic period are reliant upon the projectile point types from Monitor Valley and points sequenced by David Hearst Thomas at Gatecliff Rock shelter (Thomas 1981). The earliest evidence for occupation in the central sub-region is at Triple T and Gatecliff Shelter where Gypsum points occur with Split Stem points in deposits dating between 5,000 and 3,300 cal. B.P. roughly contemporaneous with the latter part of the Early Archaic period (Elston 1986:138).

4.1.3 Middle Archaic (4,500 to 1,500 cal. B.P.)

There is little technological difference to mark the Middle Archaic from the Early Archaic periods. The differences between these two periods are based primarily on a population boom and gradual shifts in settlement and subsistence strategies. A population boom is represented by intense use and occupation at Lowe Shelter and others in the central sub-region of the western Great Basin (Elston 1986:142). Winter and seasonal camps become noticeably reoccupied in the archaeological record with a greater diversification and exploitation of the region's resources including intensive exploitation of particular ecozones (Elston 1986:142). In addition, there is an increase or reuse of certain areas and an increase in the variety of activities (Elston 1986:142). There appears to be more of a reliance on the use of bifaces, seed processing, and the manufacture of grinding slabs and scrapers at Gatecliff Shelter. Diagnostic projectile points for this period include Elko and Martis series points. Elko points are bracketed at Gatecliff Shelter between 3,300 to 1,500 cal. B.P. (Thomas 1981:22).

An obsidian hydration analysis of 109 projectile points from northeastern Nevada (including Danger and Hogup caves) reveals Elko and Split Stem or Pinto forms may have been in the Bonneville Basin region as early as 8,000 years ago (Hockett 1995:43), nearly 5,000 years earlier than at Gatecliff Rock shelter. The presence of these point types at Gatecliff between 5,000 and 3,300 supports the theory of gradual diffusion of these forms from the east.

The first evidence for trade and exchange occurs during this period with the presence of obsidian, shell beads, and portable rock art with motifs. Big game hunting appears to remain an important subsistence strategy with a focus on mountain sheep and to a lesser degree antelope and deer. This hunting strategy would appear to remain a focus of local inhabitants until contact with Europeans.

4.1.4 Late Archaic (1,500 to 650 cal. B.P.)

The Late Archaic period begins around 1,500 cal. B.P with the advent or appearance of technological changes across the Great Basin including the introduction of the bow and arrow and ceramics (Elston 1986:145-148). Within the Lahontan Basin sub-region of the Western Great Basin, the Late Archaic is marked by the beginning of the Underdown phase identified at Gatecliff Shelter dating between 1,500 and 650 cal. B.P. (Elston 1986:146). Evidence for some contact with the horticultural groups such as the Fremont and Ancestral Puebloan includes a few pot sherds at rock shelters at Newark Cave, Lowe Shelter, and others (Elston 1986:146). Diagnostic projectile points are smaller (arrow-size) points and include triangular and Rosegate Cluster points, which are found throughout the Great Basin and eastern California where they have been dated between 1,500 and 650 cal. B.P. (Justice 2002:320-330).

The degree to which horticultural groups (Fremont or otherwise) influenced traditional Archaic hunters and gatherers in the region is largely unknown. The presence of ceramics in the area may be an indicator of agricultural developments or obtained as trade items that did not result in a significant change in land use patterns and site structure. The most dominant ceramic type in the local record at this time was Brownware pottery after 1100 (Elston 1986:145).

4.1.5 Late Precontact (Cal. 650 B.P. to Contact)

The Late Precontact period post-dates the Fremont and Ancestral Puebloan occupations and is marked in the archaeological record by the presence of Intermountain Brownware and later style triangular arrow points including the Desert Side Notch and Cottonwood series projectile points around 700 years ago (Bischoff et al. 1999:56-57; Konoske et al. 2009:18; Thomas 1981:15-19). The Late Precontact period

encompasses many of the cultural and technological practices of Native groups ancestral to today's population within the Lahontan Basin and which was present at the time of European and later American contact around 200 years ago (Stever 2011:25).

4.1.6 Early Exploration

In the 1820s, the Great Basin was one of the largest expanses of the United States that remained unexplored (Morgan 1997:36). Early American exploration of Nevada was first accomplished by fur trapping and trading. John C. Fremont, working for the Bureau of Topographical Engineers, was the first professional surveyor to enter the Great Basin. Through official government reports, Fremont was the first Euro American to provide detailed knowledge with the goal of opening of the Great Basin and Nevada to Euro American settlers and to the expansion of the American West (Egan 1985). On one expedition from California through the Carson Valley in 1844, Fremont met and spoke with a group of Washoe, writing about them in his journal (Makley 2018, 5; Egan 1985: 199-212).

4.1.7 Settlement

After the discovery of gold in California in 1848, this flow of emigrants increased considerably through Nevada (Hulse 1978:38). By the mid-1850s, thousands of travelers were passing through Nevada on their way to California. This onslaught of emigrants, along with the success and growth of the mining districts such as the nearby mining districts, brought about the need for farms and ranches to supply the increasing number of miners and prospectors arriving in the area. Congress established the Territory of Nevada in March of 1861 (Hulse 2004:75).

4.1.8 Mining

The history of mining in Nevada may start as early as the 18th century with Spanish and later Mexican missionaries sponsoring gold mining operations in the region, although these reports are unverified and may be apocryphal (Tingley et al. 1993: 8). Mormons using the Old Spanish Trail began preliminary exploration and exploitation of placer gold near Johnsonville. The discovery of the source of this placer gold, the Comstock Lode, happened in 1859 and brought tens of thousands of people into the area, leading to a population boom that enabled Nevada to be admitted as a state in 1864. After the Comstock rush, mining in the state experienced a period of decline from roughly 1881 to 1900 (Tingley et al. 1993, 18). Afterward, discoveries of gold and silver in places such as Tonopah and later Goldfield, brought a resurgence of mining into Nevada. The Lahontan Basin also saw increased mining activity in the years immediately following 1900, and three mining districts are in close proximity to the Simmons Solar Project area: Talapoosa, Ramsey, and Churchill.

Although mining is a critical part of Nevada's state history, its legacy has negatively impacted Native American communities by poisoning the land, excluding tribal communities from accessing the wealth it generates, and causing disruptions to indigenous land use, family units, and social structures. Mining is a quintessential example of extractive colonialism and is closely tied with settler colonialism. Settler colonialism "destroys to replace" and is predicated on a global supply chain linking a distant 'frontier' to a metropolis (Wolfe 2006: 388, 394.). The amount of silver, gold, and other precious metals pulled from the lands of present-day Nevada was closely linked with national and international markets, supply chains, and the growth of wealth, especially for speculators and businessmen located in large cities on both the east and west coasts. The large number of mines and their associated waste products in Nevada ensures that future generations of tribal communities will continue to be impacted.

Hardrock mining poisons the land by introducing heavy metals such as arsenic, mercury, and lead into the soil and waterways (Bonogofsky and Gearon 2013: 4). The contamination can last for decades. For instance, lead contamination in Steamboat Springs from both the Steamboat Springs and Union mines south of Reno continues to pose risks to local populations. Native communities who drink water from historic water sources, or gather local plant and animal resources for food, medicine, or ceremonial purposes are at particular risk of contamination (Bonogofsky and Gearon 2013: 4; Lewis et al. 2017: 130).

Mining also creates and reinforces inequality, as the extracted mineral wealth flows unevenly away from those who helped produce it or from whose lands it was taken. Starting in 1891, the U.S. government embarked on a legislative campaign to exclude indigenous communities from accessing mineral rights on their own lands, usually through a direct abrogation of treaty rights. In establishing reservations where tribal communities ostensibly had sovereignty, the U.S. government often excluded mineral-rich areas from reservation boundaries. In cases where mineral rights were included within tribal lands, the government mobilized the legal system against indigenous land claims, as when the 66th Congress of the United States gave mineral extraction rights on tribal lands to corporations or individuals in direct violation of previously established tribal sovereignty (Lewis et al. 2017: 131).

The flow of Euro-American settlers into the Lahontan Basin as a result of mining or other extractive practices represented the beginnings of settler colonialism in the area and led to major disruptions in traditional ways of life for Northern Paiute communities. Although many Euro-American settlers in Nevada left once mines went bust, many others stayed, and the resulting legal and economic apparatus that fell into place during Nevada's early statehood days was designed to consolidate political and economic power in the hands of Euro-American communities to the exclusion of Native communities.

4.1.9 Ethnographic Setting

The project area lies in Northern Washoe County, approximately 12 miles from Pyramid Lake. This is the traditional homeland of the Northern Paiute people, and particularly the Lake Pyramid Paiute. The following section provides a brief description of Paiute lifeways at the time of first contact with European and American colonizers. Paiute peoples have not disappeared, but rather continue to live and thrive in the region today.

The Northern Paiute at the time of contact with Europeans and later Americans occupied a vast territory east of the Sierra Nevada mountains, northward to the drainages of the Columbia and Snake Rivers, and south to the Tahoe area, where at least in the 19th century, they lived alongside Washoe peoples, fishing and hunting in some of the same areas (Fowler and Liljeblad 1986; Lerch et al 2010.) Northern Paiute communities were hunters and gatherers, taking both small and large game using bows and arrows or traps for smaller animals and using woven baskets to collect hundreds of different types of plant resources, including pinyon pine in the fall. Especially for Paiute groups living in close proximity to Pyramid Lake and the upper Truckee River, fishing was very important, with platform and weir fishing common during spawning runs in both the lakes and the rivers (Fowler and Liljeblad 1986). Waterfowl were also hunted using tule-reed boats and water decoys. These practices continue today, and the Pyramid Lake Paiute Tribe are the caretakers of the lake and its resources, as they have been for centuries.

In 1859, fearing the detrimental effect of the massive influx of American settlers following the discovery of the Comstock Lode, Major Frederick Dodge, an Indian affairs agent, requested two reservations be set aside for Northern Paiutes, including one centered on Pyramid Lake. This request would be granted in 1879, but the Pyramid Lake Paiute Tribal Council would not be established until 1934-1936 (Rusco 1988).

5.0 EXPECTATIONS

Prior to initiating the Class III survey of the project area, UES conducted a background literature review and archival records search to document the extent and intensity of previous archaeological work in the area and to develop expectations for the number and type of cultural resources that would be encountered during the block survey. The literature review consisted of a records search using the following sources:

Nevada Cultural Resources Information System (NVCRIS) online GIS database

The area of the APE and a one-mile buffer radius was searched, looking for previously recorded archaeological sites, surveys, rural architectural inventories, NR-listed resources, and in process resources (NVCRIS 2024). Linear resources were traced out beyond this one-mile buffer to identify other recorded segments and site numbers.

BLM Nevada General Land Office (GLO) Survey plats

Federal and state land patent records. The original survey plats for the area were searched as well as any updated survey plats or land transfer records (BLM GLO 2022)

Historic topographic maps and aerial photographs

Historic topographic maps at various scales including 1:100,000, 1:62500, and 1:24000 were consulted to search for potential historic trails, roads, or other linear features (USGS 2022). Historic aerial photographs were consulted to verify the information provided on historic topographic maps and to search for features that may not have been mapped. (NETR 2022).

The NRHP and Nevada State Register databases

Although the NVCRIS search included resources listed on the National Register, there are occasionally gaps between federal and state NR resource databases. UES searched both the NRHP and the Nevada State Register (Nevada State Historic Preservation Office 2022) online databases to identify any potential resources that may not have been listed in the NVCRIS database.

5.1 BACKGROUND LITERATURE SEARCH RESULTS

A NVCRIS search of the project APE and a 1-mile buffer identified nine (9) previously recorded archaeological sites, eight of which are "in process" with no site forms available for review. (Table 2, Figure 6). None of these sites are located within the 25-acre substation project area or the larger 1,715-acre Simmons Solar Project area. WA6362 is located at the extreme northern margin of the 1-mile research buffer, and most of it lies outside.

The NVCRIS search also identified three (3) previously recorded archaeological inventories (Table 2), none of which include any portion of the Simmons Solar Project. Based on the results of the NVCRIS search, it is clear that neither the 25-acre substation nor the larger project have been previously surveyed for cultural resources.

5.1.1 Archaeological Sites and NRHP Resources

Nine (9) in process sites and one previously recorded archaeological site were located within the 1-mile research radius for the Simmons Solar Project. WA6362 is an open air precontact site that was considered not eligible due to a lack of data potential and integrity. The remaining sites were recorded by Mesa Field Services in 2013 and are still in process. Their IMACS forms are not currently available for review. With the exception of the Western Pacific Railroad, the in process resources are located roughly 844 meters west of the Simmons Solar boundary.

Table 2. Summary of previously recorded sites within the project boundary and a one-mile research radius.

Trinomial	Age	Resource Type	Description	NRHP Status	Exists within APE
WA6362	Precontact	Site	Open camp	Ineligible	No
S2852	Historic	Linear	Western Pacific RR	In Process	No
WA12841	Historic	Linear	Dismantled telegraph line	In Process	No
WA13510	Precontact	Site	Lithic scatter with groundstone	In Process	No
WA13511	Precontact	Site	Lithic scatter with Blackrock concave	In Process	No
WA13514	Precontact	Site	Lithic scatter	In Process	No
WA13515	Precontact	Site	Lithic scatter	In Process	No
WA13516	Precontact	Site	Lithic scatter with groundstone	In Process	No
WA12851	Historic	Linear	Two-track	In Process	No

5.1.2 Archeological Inventories

Three previously conducted Class III surveys were located within 1 mile of the project area, although none of them encompass any part of the project boundary. They were all conducted for the BLM Winnemucca District (Table 3, Figure 6). A large block of the 18-136 survey area exists on the southeastern boundary of the Simmons project area.

Table 3. Projects previously conducted within a mile of the project area.

Report Number	Lead Agency	Report Title	Author(s)	Report Year
18-36	BLM Winnemucca	N/A	Moore, J.	2000
18-136	BLM Winnemucca	Cultural Resources Overviews of Five Proposed Wilderness Areas in Northern Nevada: Heusser Bristlecone Natural Area, Goshute Canyon, Blue Lake, Mahogany Mountain, Tule Peak (from NADB)	Seelinger, Evelyn, B. Brown, and M. K. Rusco	2005
32482	BLM Winnemucca	A Class III Inventory for the US Gypsum Empire Natural Gas Pipeline, Washoe County, Nevada	McNees, L.	2005

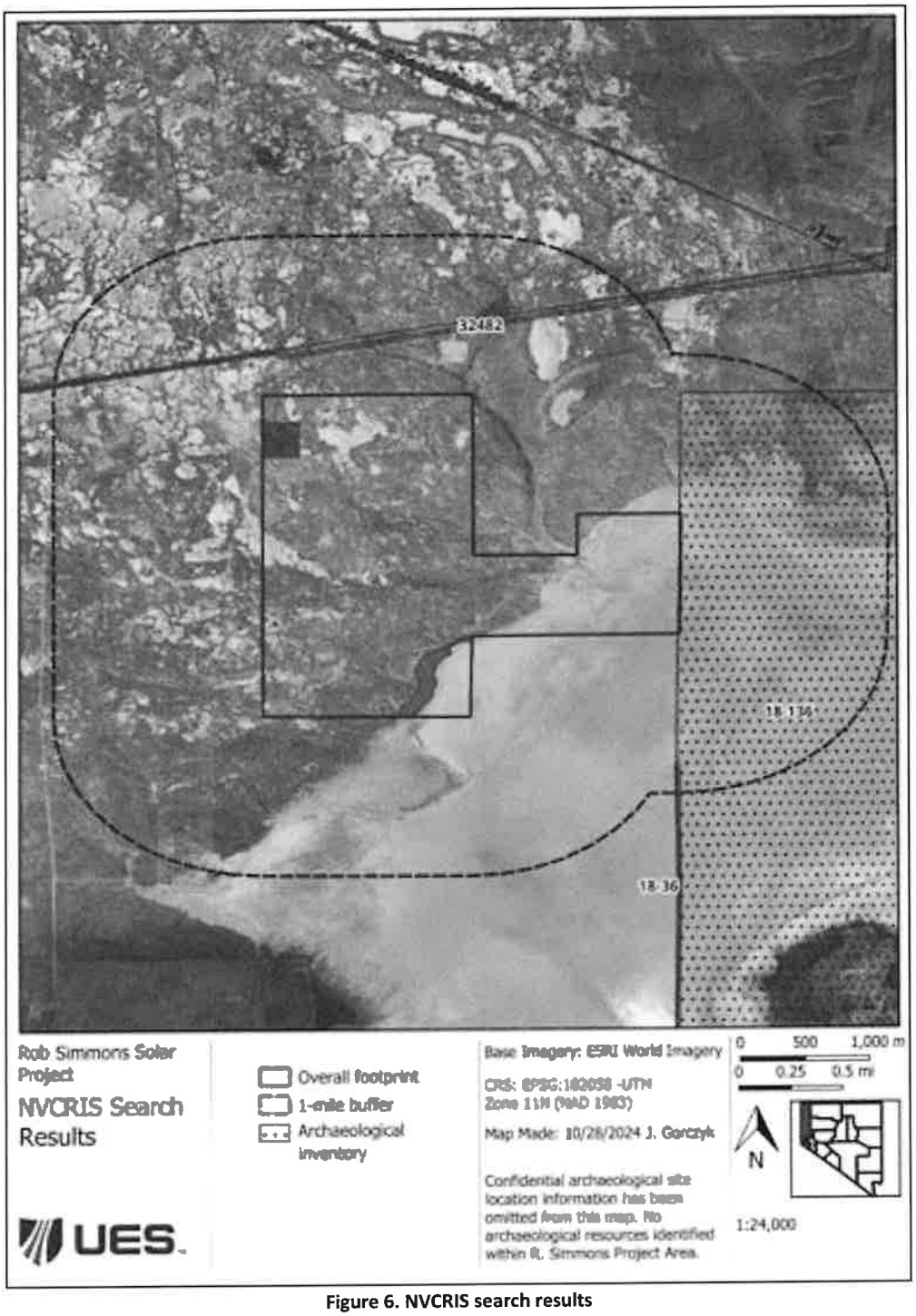


Figure 6. NVCRIS search results

5.2 5.2 HISTORIC PLATS AND MAPS

5.2.1 BLM GLO Plats

The original survey plat from 1873 from Township 26N Range 18E was available for review through the BLM's GLO online database (Figure 7). It shows the project area situated on a sandy alkali plain and within the shorelines of an alkali lake. These shorelines extend farther west than they do on more modern topographic maps and from what was observed in the field. The road to Surprise Valley, with its various connections to other roads, lies far south of the Simmons project area, and it is unlikely that any historic transportation features from the late 19th century will be located within the project boundary.

5.2.2 Historic Topographic Maps

USGS historic topographic maps of the project area were available for the years 1886. 1894, 1955, 1964, 1984 and select years between 2011 and 2020 and were reviewed through USGS Topoview. The relevant maps are discussed below. A review of the earliest maps, from 1886 and 1894, shows essentially the same situation as the GLO survey plat: the project area lies on the alkali flat on the edge of the playa and there is no development north of the project area. Flanigan, and the Western Pacific Railroad, do not appear on topographic maps until the 1950s, and the project area remains undeveloped. This situation does not change in the 1964 and 1984 maps, and by 2011 the project area is depicted on maps looking essentially as it does today.

5.2.3 NBMG District Files Search

The project area does not exist within the boundaries of any mining districts, but it is close to the Sand Pass district centered on the tail end of the Virginia Mountains to the east and the State Line District centered on the Fort Sage Mountains further south. Sand Pass was a non-metallic district, with deposits of various clays (including kaolin), sulfur, calcium carbonate, and fluoride. An undated mining map of the Sand Pass district (post 1962, likely from the 1970s) depicts mine claims close to Flanigan but situated in the hills to the east. Small hand-drawn red marks on the map in the Honey Valley could also be mining claims.

5.2.4 Historic Satellite Imagery and Aerial Photography

UES reviewed historic aerial photographs from the National Environmental Title Research (NETR 2022) for the project area. The earliest available aerial photo was from 1962. It shows the Simmons project area located south of the Western Pacific Rail Line and Southwest of Flanigan. The project area is undeveloped and is crisscrossed by dry washes leading to the dry playa. Historic aerials from 1980, 1993, 2005, 2010, 2013, and every year from 2014 to 2020 demonstrate that no real changes have taken place within the Simmons Solar project area, with the exception of the creation of the Dead Cow Airstrip, which took place between 2020 and 2023. It is characterized by a series of two track roads, a radial feature, and an airstrip storage and lookout facility.

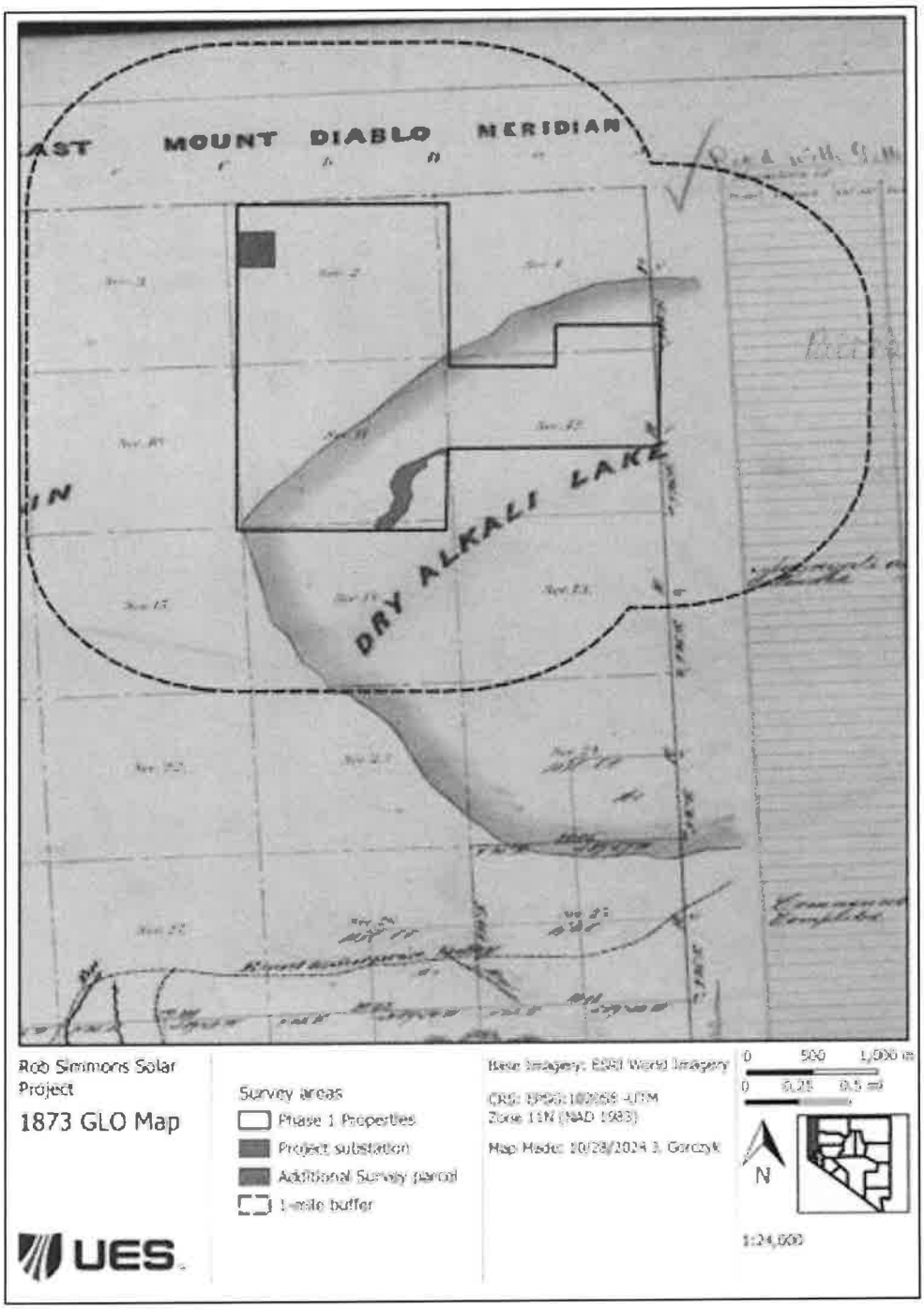


Figure 7. Simmons Solar Project Boundary on the 1873 GLO plat for Township 26N Range 18E

5.2.5 National Register of Historic Places (NRHP)

No historic properties listed on, or considered eligible for listing on, the NRHP were identified in the NR online database.

6.0 FIELD METHODS

UES conducted a Class III Cultural Resources Inventory (block pedestrian survey) of the approximately 25-acre Phase 1 substation parcel, located in the northwestern portion of the overall Simmons Solar project area, and an additional survey area along the shorelines of the playa (27 acres) in two person days on October 22, 2024. Survey and site recording methods followed the BLM's *Guidelines and Standards for Archaeological Inventory, Sixth Edition* (BLM Nevada Sixth Edition 2019).

6.1 SURVEY METHODS

A block survey was completed by walking parallel transects across the project area that were spaced 30 meters apart and oriented to the cardinal directions. When cultural resources were located, the survey paused and personnel walked closer transects around the area to determine whether the find was an isolate or part of an archaeological site. If the artifact was part of a site, the archaeologists used tightly spaced transects to establish the boundaries of the site.

6.2 SITE AND ARTIFACT RECORDING

A site is defined as a location with two or more artifacts or features within 30 meters of one another. An isolated artifact, by contrast, is a single artifact with no other cultural materials present within 30 meters. An artifact may still be an isolate if numerous pieces from the same object are located in close proximity (e.g., a broken bottle). The same logic was applied to lithic reduction episodes, when it was clear that the find represented a single cobble with a few flakes removed. Isolated artifacts were recorded using FulcrumTM Field Inspection Management Platform. Fulcrum creates single, georeferenced records where artifact information and photographs can be stored. These records are curated in a cloud-based database that UES backs up at regular intervals. All artifact attributes can be recorded in a single record within Fulcrum. All photos were taken using a 12-megapixel iPhone SE or higher and converted to TIFF format in accordance with BLM photography standards and recorded on an image log.

Sites were recorded using standard IMACS Short forms and associated forms for different artifact classes (e.g., cans, glass, flake debitage, etc.). Site boundaries were recorded in Fulcrum by creating a georeferenced point with attached overview photos and later converted to a polygon feature in QGIS (version 3.28). At least two overview photos were provided for each site, depending on its size. Diagnostic artifacts, features, and artifact concentrations within sites were also plotted using Fulcrum. Fulcrum utilizes the internal GPS chipset for whichever device it is currently using, and thus cannot provide the sub-meter accuracy required for site mapping according to the BLM standards. Therefore, for site mapping, the device using Fulcrum (typically a smartphone) was paired with a Bad ElfTM GNSS Surveyor, which provides in-the-field accuracy to within 1 meter and allows for sub meter accuracy during post processing.

Previously recorded sites were revisited and subjected to minimum recording standards following BLM guidelines. This usually meant remapping site boundaries to modern GIS standards, noting any additional

diagnostic artifacts or features that were not previously recorded, and commenting on the integrity of the site.

GIS shapefiles for all site boundaries, diagnostic artifacts, and isolates are provided as a supplement to this report using the NAD 83 datum, zone 11.

7.0 RESULTS OF SURVEY

The Class III inventory did not result in the identification of any archaeological sites or isolated artifacts within the 25-acre Phase I substation parcel. Within the additional 27-acre survey area, three new archaeological sites were recorded. No previously recorded archaeological sites were present in the APE that required updates.

Table 4. Newly recorded archaeological sites in additional survey area

BLM Resource No./Trinomial /Field No.	Temporal Association	Description	NRHP Status Recommendation
UES-010-001	Precontact	Sparse lithic scatter	Ineligible
UES-010-002	Precontact	Sparse lithic scatter	Ineligible
UES-010-003	Precontact	FAR hearth feature	Ineligible

Temporary site number: UES-010-001
State site number: Pending
Eligibility: Ineligible (D)

The site is a sparse lithic scatter comprised of 2 flakes (1 chert, 1 chalcedony) and 2 angular fragments (shatter) of heat-treated chert with evidence of pot lidding. The site is located on the edge of the Dead Cow playa between hyper deflated coppice dunes topped by desert shrubs with otherwise very little vegetation in the surrounding area. The site measures approximately 26 x 8 meters and has an artifact density of 1 artifact/square meter.

Temporary site number: UES-010-002
State site number: Pending
Eligibility: Ineligible (D)

The site is a sparse lithic scatter comprised of 15 flakes of five distinct material types. Although the artifact density never exceeds 2 artifacts/square meter, the site itself is fairly large, measuring approximately 60 x 20 meters. The site is located on the edge of the Dead Cow playa, approximately 141 meters south of the Dead Cow Airstrip facility and is situated between hyper deflated coppice dunes topped by desert shrubs with otherwise very little vegetation in the surrounding area.

Temporary site number: UES-010-003
State site number: Pending

Eligibility: Ineligible (D)

The site consists of a single feature, a roughly 3 x 2 m FAR scatter containing pieces of basalt and caliche that range from 4 cm to around 25-30 centimeters in length. In total, the feature is made up of 25 separate stones that are noticeably concentrated in the area and some of which exhibit clear signs of heat treatment. One of the caliche fragments is a small slab and resembles a slab metate, but no signs of use wear were observed so it may not have served that function. It is most likely a deflated hearth feature, but a trowel scrape through the rocks did not reveal any charcoal staining or evidence for subsurface deposits. The site is located on the edge of the Dead Cow playa between hyper deflated coppice dunes topped by desert shrubs with otherwise very little vegetation in the surrounding area. Feature 1 is the entire site.

8.0 NRHP ELIGIBILTY RECOMMENDATIONS

Temporary site number: UES-010-001
State site number: Pending
Eligibility: Ineligible (D)

The site is a very sparse lithic scatter containing only a handful of flakes and no diagnostic artifacts or evidence of subsurface deposits. Therefore, the site does not have the potential to yield the data types necessary to answer the research questions set forth in the historic context prepared for the Simmons Solar Report and should be considered ineligible.

Temporary site number: UES-010-002
State site number: Pending
Eligibility: Ineligible (D)

The site is a very sparse lithic scatter containing only a handful of flakes and no diagnostic artifacts or evidence of subsurface deposits. Therefore, the site does not have the potential to yield the data types necessary to answer the research questions set forth in the historic context prepared for the Simmons Solar Report and should be considered ineligible.

Temporary site number: UES-010-003
State site number: Pending
Eligibility: Ineligible (D)

The site is an FAR scatter containing stones that are clearly heat-affected and is likely a hearth area. But it does not contain evidence of charcoal staining or subsurface depth. Therefore, the site does not have the potential to yield the data types necessary to answer the research questions set forth in the historic context prepared for the Simmons Solar Report and should be considered ineligible.

9.0 CONCLUSION AND RECOMMENDATIONS

UES has completed an archaeological survey of two parcels within the Simmons Solar project area, located southwest of Flanigan, NV. UES conducted thorough background research (Class I) using the NVCRIS database, GLO records, historic maps and aerials, and the NRHP database. On October 22, 2024, UES archaeologists John Gorczyk and Ted Roberts completed a Class III cultural resources inventory for two parcels: the 25-acre substation parcel, which constitutes the direct APE for the Phase I undertaking, and an additional 27-acre parcel located along the shoreline of the playa. UES did not identify any isolated objects or record any new archaeological sites within the 25-acre substation area. Within the additional 27-acre survey area, UES identified 3 new archaeological sites (UES-010-001 through -003). None of the newly recorded sites is recommended eligible for listing on the NRHP due to lack of data potential. Therefore, UES recommends a finding of ***no historic properties affected*** for the undertaking.

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APPENDIX A: PHOTOLOG

No.	Site No.	Description	Bearing	Location UTMs (NAD 83) Zone 11N		Date
				Easting	Northing	
1	UES-010-001	Site overview facing north	8°	250660.9	4446457	10/22/2024
2	UES-010-001	Site overview facing southeast	198°	250653.1	4446443	10/22/2024
3	UES-010-002	Site overview facing southeast	124°	250974.8	4446989	10/22/2024
4	UES-010-002	Site overview facing northwest bearing 269°. Dead Cow Airfield facility visible in background.	269°	250974	4446976	10/22/2024
5	UES-010-003	Overview of Feature 1 facing east	90°	250637.1	4446784	10/22/2024
6	UES-010-003	Site overview facing northwest bearing 269°. Dead Cow Airfield facility visible in background.	269°	250634.1	4446781	10/22/2024
7		Overview of Substation survey area	289°	249456.5	4448932.	10/22/2024
8		Overview of Substation survey area	89°	249448.2	4448936.0	10/22/2024
9		Photo 9: Overview of additional survey area	303°	250676.3m	4446634.1	10/22/2024

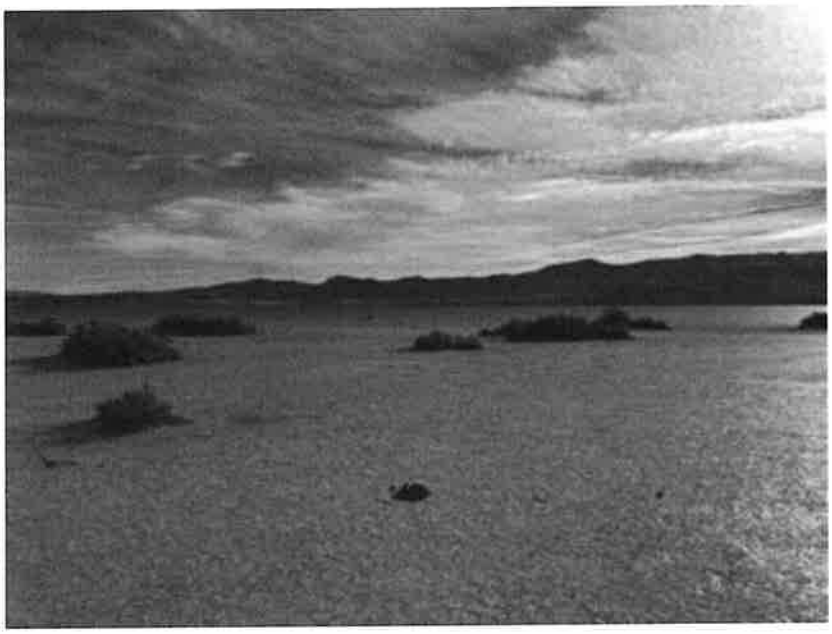


Photo 1: UES-010-001 Site overview facing north, bearing 8°. UTM Zone 11N 250660.88mE, 4446456.96mN.

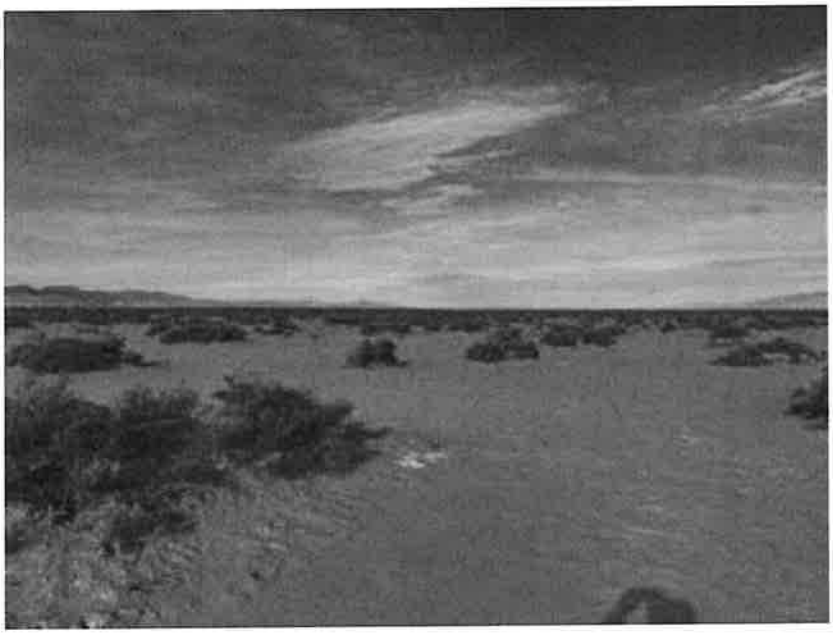


Photo 2: UES-010-001 Site overview facing southwest, bearing 198°. UTM Zone 11N 250660.88mE, 4446456.96mN.

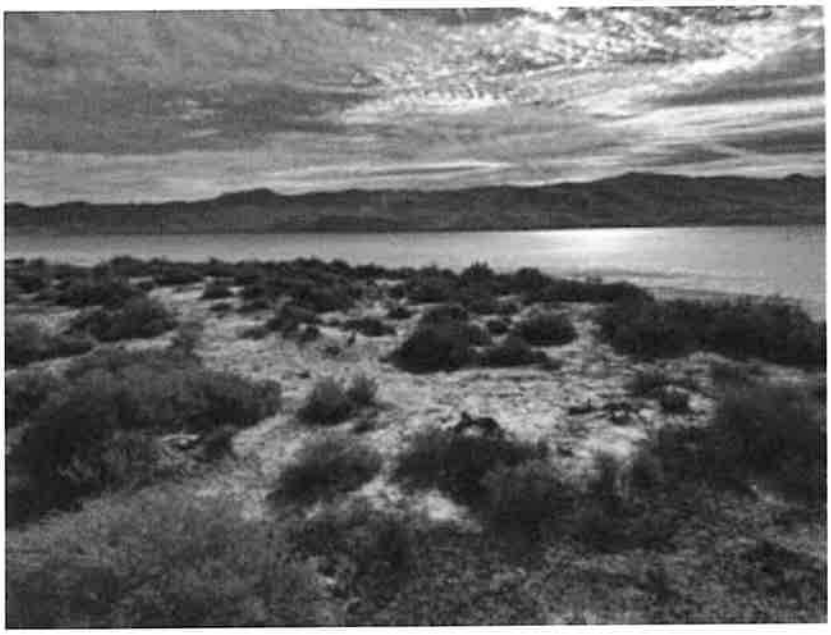


Photo 3: UES-010-003 Site overview facing southeast, bearing 124°. UTM Zone 11N 250974.77mE, 4446989.48mN



Photo 4: UES-010-002 Site overview facing northwest bearing 269°. Dead Cow Airfield facility visible in background. UTM Zone 11N 250973.99mE, 4446975.51mN

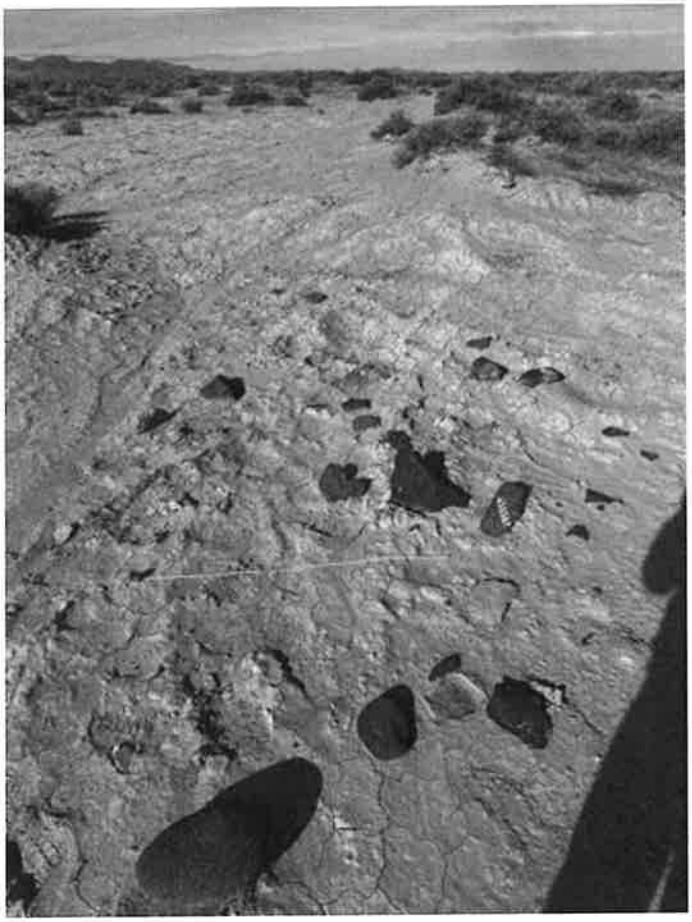


Photo 5: UES-010-003 Overview of Feature 1 facing east, bearing 90°. UTM Zone 11N 250637.1mE, 4446784.2mN



Photo 6: UES-010-003 Overview of Feature 1 bearing 124°. Dead Cow Airfield facility visible in background. UTM Zone 11N 250634.1mE, 4446780.8mN

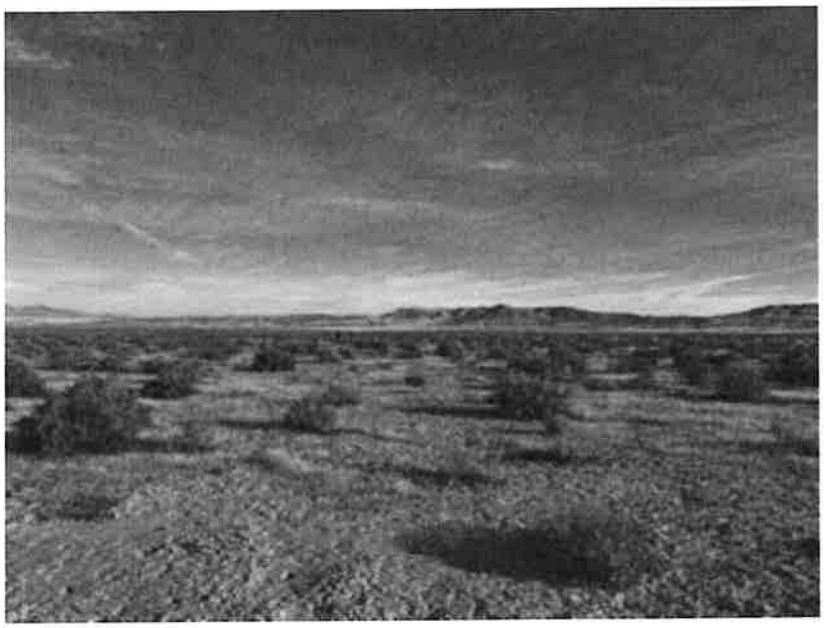


Photo 7: Overview of Substation survey area, bearing 283°. UTM Zone 11N 249456.5mE, 4448932.8mN

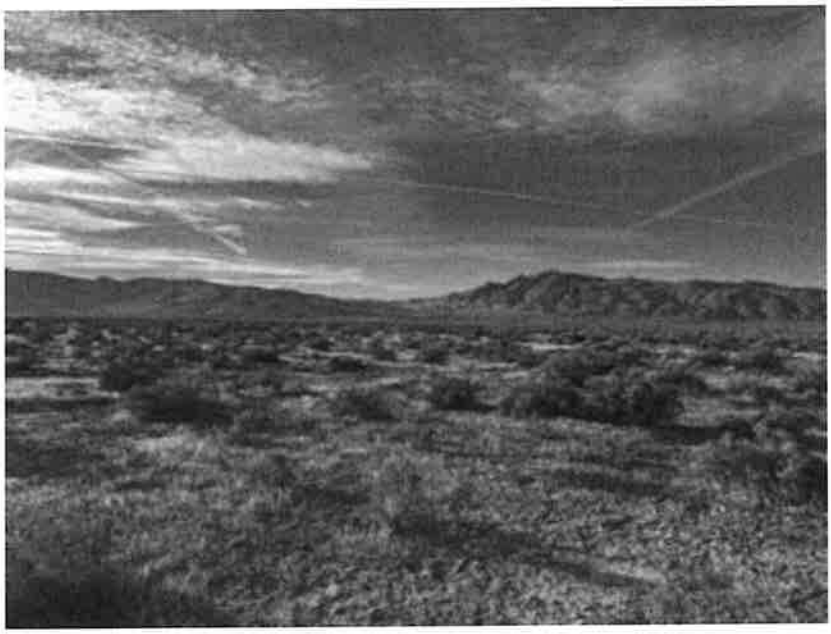


Photo 8: Overview of Substation survey area, bearing 89°. UTM Zone 11N 249448.2mE, 4448936.0mN

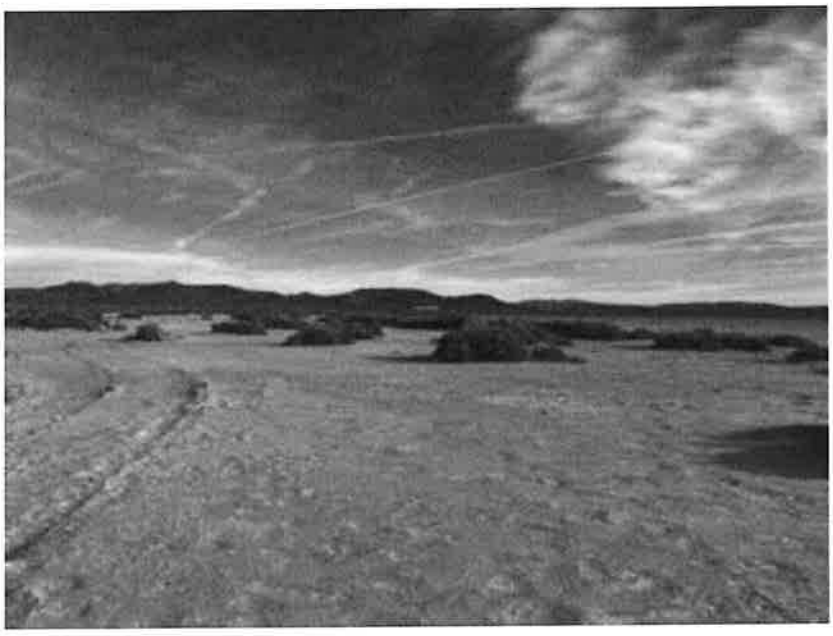


Photo 9: Overview of additional survey area, bearing 303°. UTM Zone 11N 250676.3mE, 4446634.1mN

Appendix D – El Centro BESS Project Noise Study

EILAR ASSOCIATES, INC.

Acoustical and Environmental Consulting

210 South Juniper Street, Suite 100, Escondido, CA 92025
Phone: 760-738-5570 or 800-439-8205 • Fax: 760-738-5227
www.eilarassociates.com • info@eilarassociates.com

September 15, 2016

Job #B60902N1

Tri-Technic, Inc.
Attention: Dennis Ledbetter
185 South Fairview Lane
Sonora, California 95370

Subject: Post-Installation Noise Measurements for IID El Centro BESS Project

Eilar Associates has conducted post-installation noise measurements of the noise-generating equipment at the recently constructed Imperial Irrigation District (IID) Battery Energy Storage System (BESS) in El Centro. Post-installation noise measurements aim to determine compliance with project noise requirements as well as noise requirements contained within the City of El Centro Municipal Code.

Project Description & Noise Sources

The subject property is located at 485 East Villa Avenue in the City of El Centro, California. Please refer to Figures 1 through 3 for a Vicinity Map, Satellite Aerial Photograph, and Topographic Map of the site, respectively. The project site is zoned LU (Limited Use). The property to the west is zoned ML (Light Manufacturing), and the property to the South is zoned MG (General Manufacturing). Properties to the north and east are located within the County of Imperial, and are zoned A2U (General Agricultural).

The project included the construction of a new building to house an array of batteries, with a total capacity of 30 MW. A total of 32 transformers and 30 inverters associated with the battery system were also installed on post-tensioned concrete slabs at the exterior of the building, as well as air conditioning equipment serving the building. For additional project details and equipment positioning, please refer to the project plans, provided in Appendix A.

Noise and Sound Level Descriptors

All noise level or sound level values presented herein are expressed in terms of decibels (dB), with A-weighting, abbreviated "dBA," to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol "L_{EQ}." Unless a different time period is specified, "L_{EQ}" is implied to mean a period of one hour.

Methodology

Decibel Addition

To determine the combined logarithmic noise level of two known noise source levels, the values are converted to the base values, added together, and then converted back to the final logarithmic value, using the following formula:

$$L_C = 10\log(10^{L1/10} + 10^{L2/10} + 10^{LN/10})$$

where L_C = the combined noise level (dB), and
L_N = the individual noise sources (dB).

Cadna Noise Modeling Software

Modeling of the outdoor noise environment is accomplished using Cadna Version 4.6, which is a model-based computer program developed by DataKustik for predicting noise impacts in a wide variety of conditions. Cadna (Computer Aided Noise Abatement) assists in the calculation, presentation, assessment, and alleviation of noise exposure. It allows for the input of project information such as noise source data, barriers, structures, and topography to create a detailed model and uses the most up-to-date calculation standards to predict outdoor noise impacts.

Applicable Noise Standards

According to the engineering, procurement, and construction requirements document for this project, the maximum sound level generated by the BESS systems and associated equipment should not exceed a noise level of 60 dBA at a distance of 50 feet from the substation fence or building exterior, or as required by local ordinances. As there are no sensitive receivers located within 50 feet of the building exterior, the noise limits have been evaluated at the closest fence lines to the facility, at the north and west property lines of the project site. The noise regulations applicable to this project are contained within the City of El Centro and County of Imperial Municipal Codes which specify noise limits based on the zoning of the property in question.

According to Section 17.1.4 of the City of El Centro Municipal Code, the noise limit for properties zoned LU is an hourly average of 60 dBA L_{EQ} between the hours of 7 a.m. and 10 p.m., and 55 dBA L_{EQ} between the hours of 10 p.m. and 7 a.m. The noise limit for properties zoned for manufacturing is an hourly average of 75 dBA L_{EQ} between the hours of 7 a.m. and 10 p.m., and 70 dBA L_{EQ} between the hours of 10 p.m. and 7 a.m. Additionally, according to the municipal code, the noise limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. As the BESS facility may operate during any hour on any given day, the more restrictive nighttime noise limits would apply. Therefore, the nighttime noise limit of 62.5 dBA L_{EQ} would apply at the west and south property lines.

According to Title 9, Division 7, Chapter 2 (Sound Level Limits) of the County of Imperial Municipal Code, the noise limit for properties zoned for agricultural use is an hourly average of 70 dBA L_{EQ} at any time.

Measurement Equipment

The following equipment was used at the site to measure noise levels:

- Larson Davis Model LxT Type 1 Integrating Sound Level Meter, Serial #4084
- Larson Davis Model CA250 Type 1 Calibrator, Serial #2625
- Tripods, microphones with windscreens
- Distance measurement wheel and tape measure

The sound level meter was field-calibrated immediately prior to all noise level measurements and checked afterwards, to ensure accuracy. All sound level measurements conducted and presented in this report were made with sound level meters that conform to the American National Standards Institute specifications for sound level meters (ANSI S1.4). All instruments are maintained with National Bureau of Standards traceable calibration, per the manufacturers' standards.

On-Site Noise Level Measurements

A site visit was conducted on the morning of Monday, September 12, 2016 to perform noise level measurements with and without the BESS facility in operation, and to determine ambient noise levels in the vicinity of the project. During all noise measurements, the microphone position was placed approximately five feet above grade.

Noise from BESS Air Conditioning Equipment and Gas Turbine Facility Equipment

Upon arrival to the site, the BESS equipment was not in operation; however, the air conditioning equipment serving the BESS facility was in operation. In addition to noise from the operational air conditioning equipment serving the BESS facility, noise from the adjacent gas turbine facility was audible at the site and was the primary source of ambient noise. In order to determine the ambient noise environment without the influence of equipment operation at the BESS facility, measurements were conducted at several locations around the BESS facility. Close-range noise measurements were then conducted of the air conditioning equipment to incorporate into a Cadna noise model for verification of results, and to estimate the noise contribution of the adjacent gas turbine facility. Using the methodology described above, the modeled/calculated noise level was subtracted from the measured noise level at each receiver location to estimate the ambient noise level at each receiver.

Please refer to Table 1 for results of these measurements and calculations. For a graphical representation of the noise measurement locations and equipment noise contours, please refer to Figure 4.

Table 1. Noise Measurements and Estimated Ambient Noise Levels				
Location	Dominant Noise Source(s)	Noise Level (dBA)		
		Measured Noise Level (Ambient + HVAC)	Calculated Noise Level (HVAC Only)	Calculated Ambient Noise Level
Cal 1	HVAC	79.8	79.8	< 60
Cal 2	HVAC	78.8	78.7	< 60
Cal 3	HVAC, Gas Turbine Equipment	63.8	59.7	61.7
Cal 4	Gas Turbine Equipment, HVAC	59.5	53.5	58.2
Cal 5	Gas Turbine Equipment	59.5	49.5	59.5
Cal 6	Gas Turbine Equipment, HVAC	54.9	47.4	54.0
Cal 7	HVAC, Gas Turbine Equipment	61.1	57.4	58.7
Cal 8	Gas Turbine Equipment, HVAC	59.8	55.1	58.0
Cal 9	HVAC	N/A	70.8	< 60

Noise from BESS Air Conditioning Equipment and Gas Turbine Facility Equipment

After establishing the HVAC and ambient noise levels surrounding the facility, noise level measurements were then conducted with the BESS facility equipment in operation at full discharge. In order to determine the noise impacts from equipment associated with the BESS facility, the calculated ambient noise levels were subtracted from the measured noise levels. Please refer to Table 2 for results of these measurements and calculations.

Table 2. Noise Measurements and Estimated BESS Noise Levels				
Location	Dominant Noise Source(s)	Noise Level (dBA)		
		Measured Noise Level (Ambient + BESS)	Calculated Ambient Noise Level	Adjusted Measured Noise Level (BESS Only)
Cal 3	BESS Equipment, Gas Turbine Equipment	67.9	61.7	66.7
Cal 4	BESS Equipment , Gas Turbine Equipment	62.0	58.2	59.7
Cal 5	Gas Turbine Equipment	N/A	59.5	N/A
Cal 6	Gas Turbine Equipment, BESS Equipment	55.8	54.0	51.1
Cal 7	BESS Equipment, Gas Turbine Equipment	68.7	58.7	68.2

Table 2. Noise Measurements and Estimated BESS Noise Levels				
Location	Dominant Noise Source(s)	Noise Level (dBA)		
		Measured Noise Level (Ambient + BESS)	Calculated Ambient Noise Level	Adjusted Measured Noise Level (BESS Only)
Cal 8	Gas Turbine Equipment, BESS Equipment	60.7	58.0	57.4
Cal 9	BESS Equipment	78.1	< 60	78.1

In order to determine the accuracy of the noise model, the adjusted measured noise levels were compared to the calculated noise levels at the same receiver locations. Typically, a noise model is considered to be calibrated if the results of the noise model fall within three decibels of measurement results at the same locations. Please refer to Table 3 for a comparison of calculated and measured noise levels of equipment associated with the BESS facility. For a graphical representation of BESS equipment noise contours, and receiver locations, please refer to Figure 5.

Table 3. Calculated BESS Noise Levels and Model Verification				
Location	Dominant Noise Source(s)	Noise Level (dBA)		
		Adjusted Measured Noise Level (BESS Only)	Calculated Noise Level (BESS Only)	Difference
Cal 1	HVAC	N/A	80.8	N/A
Cal 2	HVAC	N/A	79.2	N/A
Cal 3	BESS Equipment, Gas Turbine Equipment	66.7	67.9	1.2
Cal 4	BESS Equipment, Gas Turbine Equipment	59.7	61.3	1.6
Cal 5	Gas Turbine Equipment	N/A	57.1	N/A
Cal 6	Gas Turbine Equipment, BESS Equipment	51.1	55.3	4.2
Cal 7	BESS Equipment, Gas Turbine Equipment	68.2	68.2	0.0
Cal 8	Gas Turbine Equipment, BESS Equipment	57.4	58.3	0.9
Cal 9	BESS Equipment	78.1	76.9	1.2
North Fence	N/A	N/A	54.3	N/A
West Fence	N/A	N/A	48.0	N/A

With the exception of the Cal 6 receiver, all calculated results were found to be within two decibels of the measured noise levels of the BESS facility, once the measured results were adjusted to account for the noise produced by the adjacent gas turbine facility. It should be noted that, as the calculated result at the CAL 6 receiver exceeded the adjusted measurement result at the same

receiver, the model can be considered to be a worst-case representation of anticipated noise levels from the facility. As the measured and calculated results differ by less than three decibels for the majority of the receiver locations, results of the Cadna noise model can be considered to be representative of the anticipated noise impacts from the BESS facility.

As shown above in Table 3, according to the Cadna noise model, anticipated noise levels at the north and west fence lines are expected to be 54.3 dBA and 48.0 dBA, respectively. As these noise levels are below the project criteria of 60 dBA and are also below the applicable nighttime noise limits for the City of El Centro and County of Imperial, the project can be considered to be in compliance as currently constructed. Based on the noise measurements and calculations documented herein, no mitigation is deemed necessary for attenuating exterior noise levels from the BESS facility

Conclusion

As installed, noise levels generated by the BESS facility were determined to be in compliance with project requirements as well as the applicable City of El Centro and County of Imperial noise limits. Based on the noise measurements and calculations documented herein, no mitigation is deemed necessary for attenuating exterior noise levels from the BESS facility.

This report is based on project information received and measured noise levels, and represents a true and factual analysis of the acoustical impact issues associated with the IID BESS facility in the City of El Centro, California. This report was prepared by Jonathan Brothers, Dan Gershun, and Amy Hool.

EILAR ASSOCIATES, INC.

Jonathan Brothers, Principal Acoustical Consultant

Daniel Gershun, Acoustical Consultant

Figures

1. Vicinity Map
2. Satellite Aerial Photograph
3. Topographic Map
4. Satellite Aerial Photograph Showing HVAC Noise Contours and Receiver Locations
5. Satellite Aerial Photograph Showing BESS Equipment Noise Contours and Receiver Locations

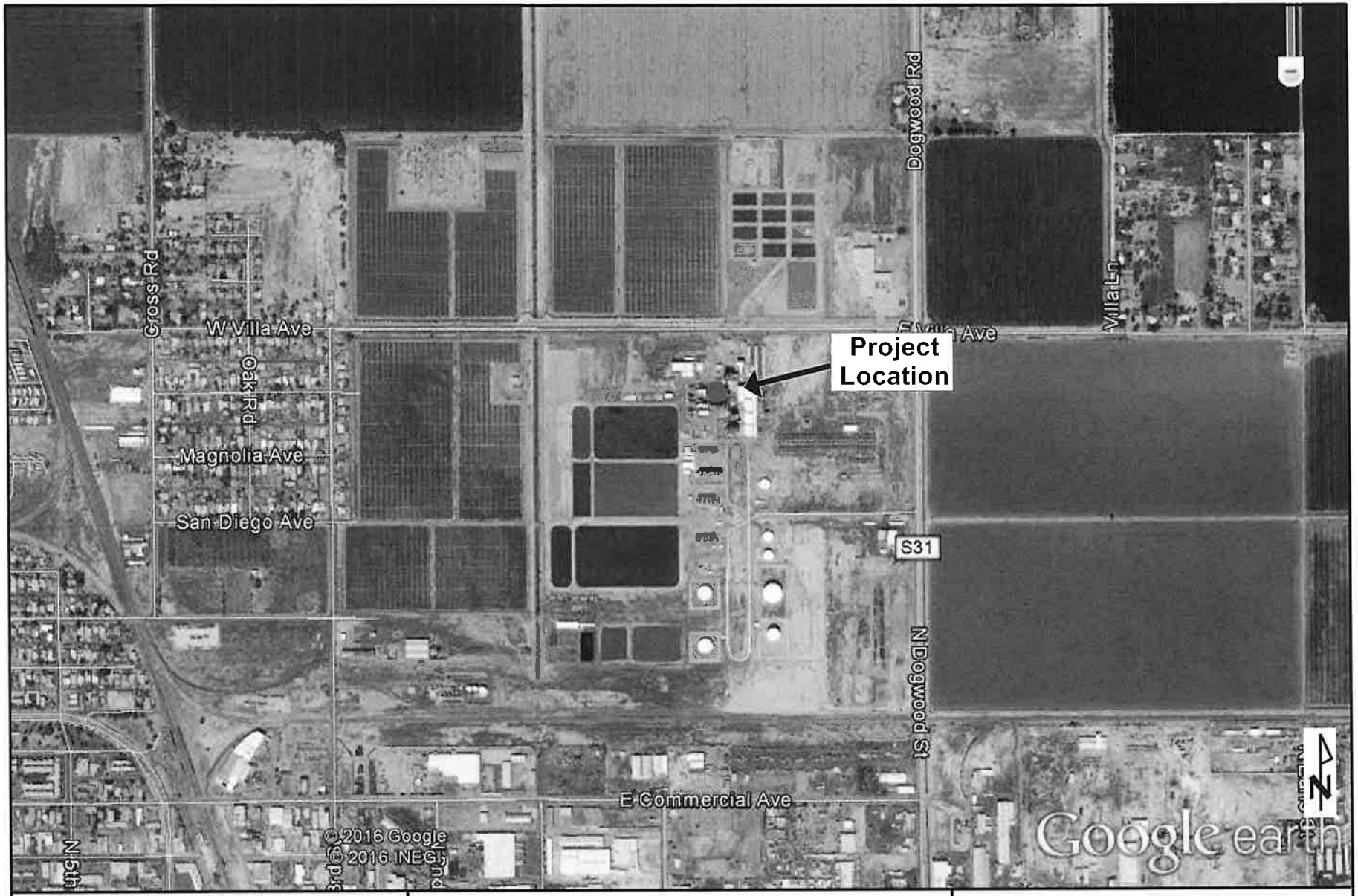
Appendix

A. Project Plans

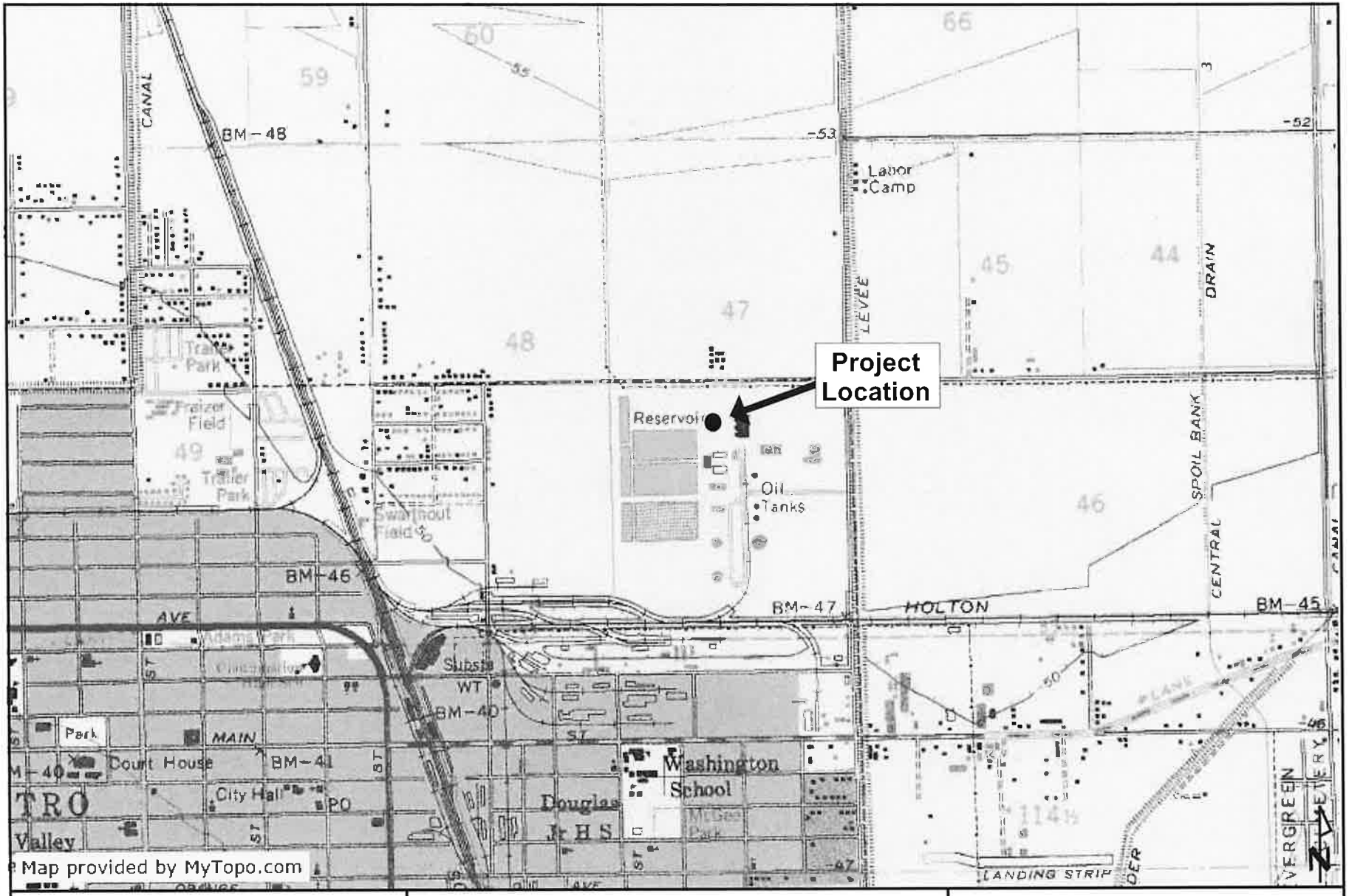
FIGURES



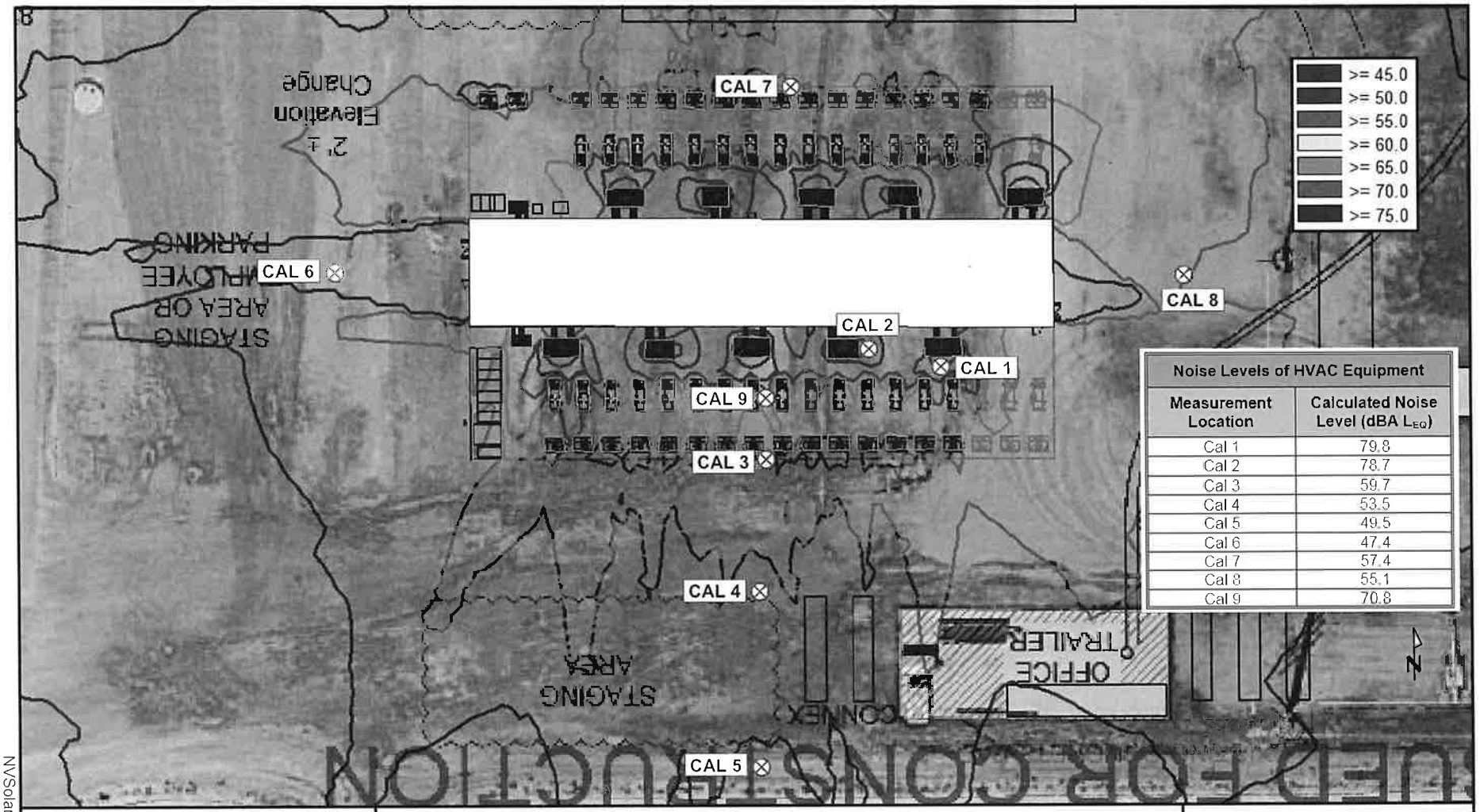
Eilar Associates, Inc. **210 South Juniper Street, Suite 100** **Escondido, California 92025** **760-738-5570**	**Vicinity Map** **Job #B60902N1**	**Figure 1**



Eilar Associates, Inc. 210 South Juniper Street, Suite 100 Escondido, California 92025 760-738-5570	Satellite Aerial Photograph Job # B60902N1	Figure 2

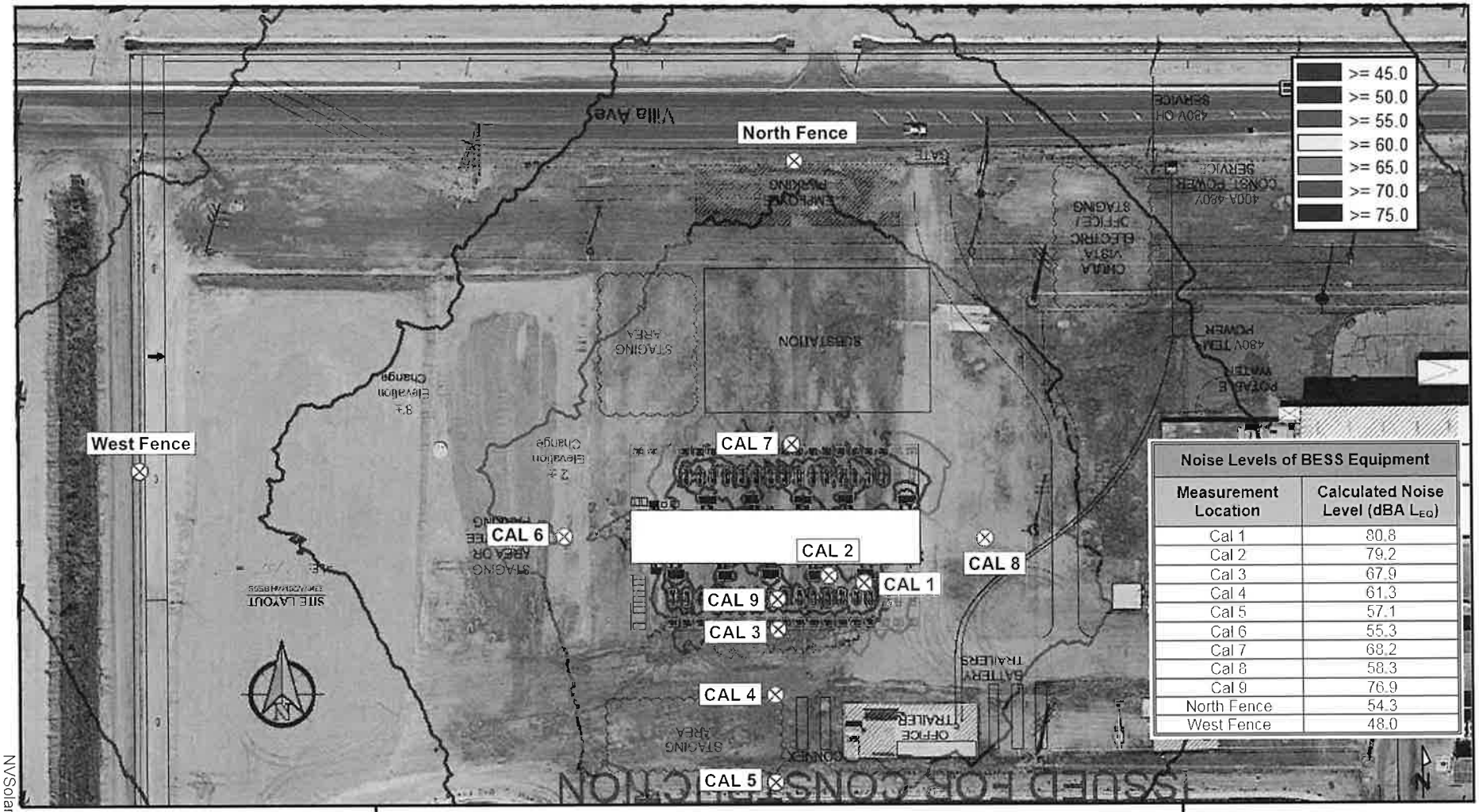


Eilar Associates, Inc. **210 South Juniper Street, Suite 100** **Escondido, California 92025** **760-738-5570**	**Topographic Map** **Job # B60902N1**	**Figure 3**



Noise Levels of HVAC Equipment	
Measurement Location	Calculated Noise Level (dBA L_{EQ})
Cal 1	79.8
Cal 2	78.7
Cal 3	59.7
Cal 4	53.5
Cal 5	49.5
Cal 6	47.4
Cal 7	57.4
Cal 8	55.1
Cal 9	70.8

Eilar Associates, Inc. 210 South Juniper Street, Suite 100 Escondido, California 92025 760-738-5570	Satellite Aerial Photograph Showing HVAC Noise Contours and Receiver Locations Job # B60902N1	Figure 4



Noise Levels of BESS Equipment	
Measurement Location	Calculated Noise Level (dBA L_{EQ})
Cal 1	80.8
Cal 2	79.2
Cal 3	67.9
Cal 4	61.3
Cal 5	57.1
Cal 6	55.3
Cal 7	68.2
Cal 8	58.3
Cal 9	76.9
North Fence	54.3
West Fence	48.0

Eilar Associates, Inc.
210 South Juniper Street, Suite 100
Escondido, California 92025
760-738-5570

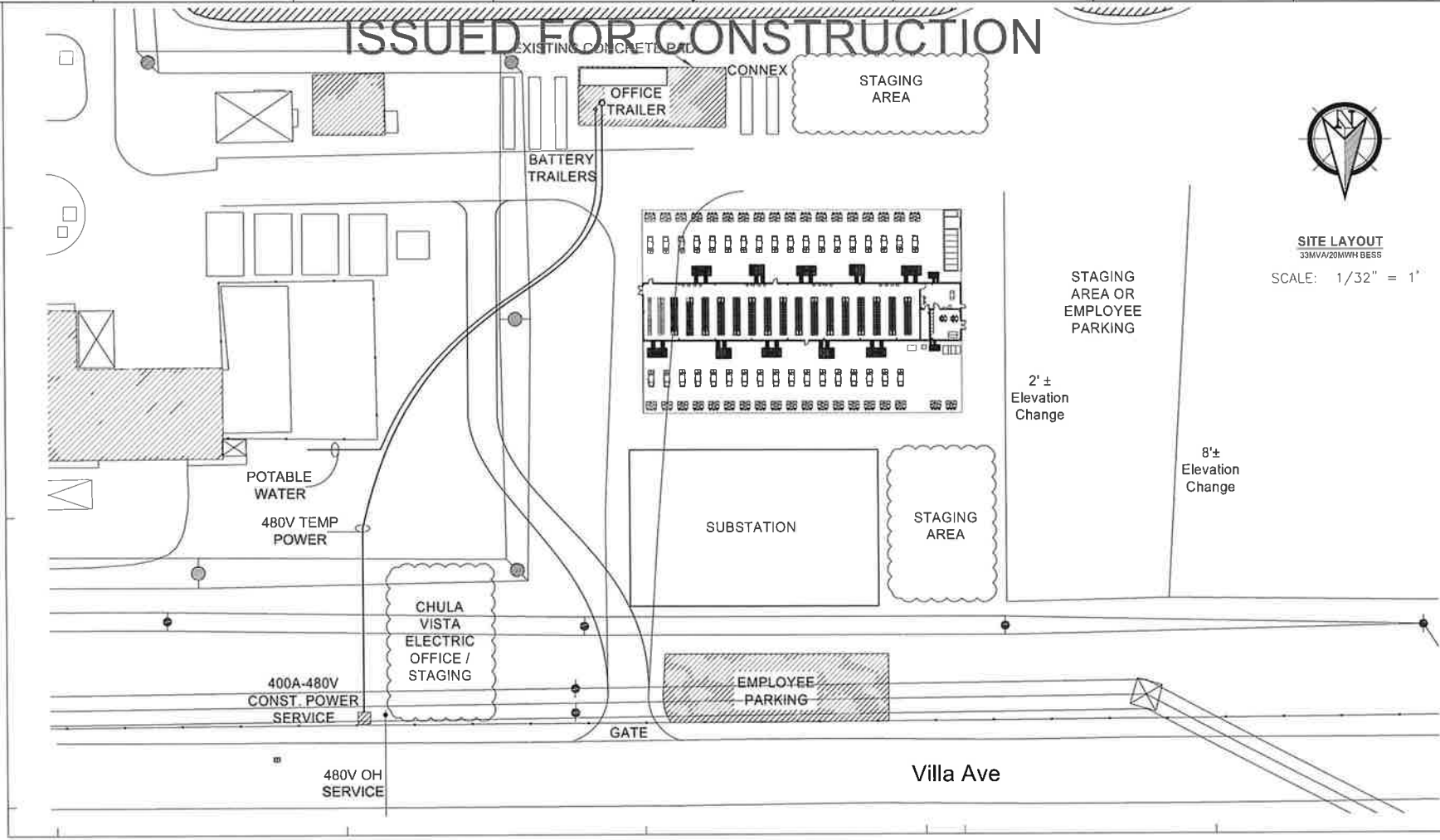
Satellite Aerial Photograph Showing BESS Equipment Noise Contours and Receiver Locations
Job # B60902N1

Figure 5

APPENDIX A

Project Plans

ISSUED FOR CONSTRUCTION



SITE LAYOUT
33MVA/20MWH BESS

SCALE: 1/32" = 1'

Tri-Technic, Inc.
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No.	DATE	BY	CHK	APVD	REVISION

COACHELLA ENERGY STORAGE PARTNERS

I I D ENERGY
A Division of IMPERIAL IRRIGATION DISTRICT

SITE LAYOUT
33MVA/20MWH_BESS

DRAWN BY: V.L.(TTI)	APPROVED BY: D.P.(GE)		
ISSUED BY: D.L.(TTI)	REVISED BY:		SEC
SCALE: 1/32"=1'	DWG No. BESS-102		REV#

EXHIBIT H

Public Notice

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA
NOTICE OF APPLICATION FOR A PERMIT TO CONSTRUCT A UTILITY FACILITY UNDER THE UTILITY ENVIRONMENTAL PROTECTION ACT

NVSolarWRX, LLC ("NSW" or the "Applicant") is submitting, pursuant to the Nevada Utility Environmental Protection Act ("UEPA"), an application to the Public Utilities Commission of Nevada ("PUCN") for a permit to construct a 450 megawatt ("MW") solar photovoltaic ("PV") generating facility ("Generating Facility"); a 345 kilovolt ("kV") substation ("Project Substation"); an approximately 7-mile-long, 345 kV overhead generation-tie line ("Gen-Tie"); and associated facilities, including a battery energy storage system ("BESS") with a capacity of up to 200 MW, in Washoe County, Nevada (the "Project") pursuant to Nevada Revised Statutes Chapter 704.820 through .900, inclusive, and Nevada Administrative Code Chapter 703.415 through .427, inclusive (the "Application"). The Project will provide renewable energy to the electrical transmission grid via the existing Fort Sage Substation, which is owned and operated by Sierra Pacific Power Company d/b/a NV Energy ("SPPCo"). The Project will consist of five basic components: (1) an up to 450 MW alternating current solar PV Generating Facility; (2) a 345 kV Project Substation; (3) a 345 kV overhead Gen-Tie which will travel roughly 7 miles from the Project Substation to the existing SPPCo Fort Sage Substation; (4) an up to 200 MW capacity BESS; and (5) associated facilities and components, including access roads and fencing.

The Project will be located on approximately 1,692 acres of private land located in unincorporated Washoe County, within the sparsely populated Honey Lake Valley near the Nevada/California state line, approximately 40 miles north of the City of Reno and 9 miles east of Herlong, California. The Project site consists of the following: (1) the Project property, which consists of 4 adjoining parcels totaling approximately 1,680 acres; and (2) 7 linear miles (approximately 12 acres) of an existing private access and utility easement – specifically, within the Truckee Meadows Regional Planning Agency's designated Rainbow Way 345 kV Regional Utility Corridor – extending west from the Property two miles to Rainbow Way and continuing five miles south along Rainbow Way to the Fort Sage Substation. The Project will result in the disturbance of approximately 1,692 acres of land in total, and construction will last up to approximately 7 months and take place in 4 phases. Universal Engineering Sciences, Inc. conducted an environmental review of the Project and prepared an Environmental Statement which is included with the Application.

NOTICE OF THE APPLICATION FOR A PERMIT TO CONSTRUCT UNDER UEPA FOR A 450 MW SOLAR PV GENERATING FACILITY, 345 kV PROJECT SUBSTATION, 345 kV GEN-TIE, AN UP TO 200 MW CAPACITY BESS, AND ASSOCIATED FACILITIES.

Notice is hereby given to persons residing in the municipalities in which any portion of the Project will be located and constructed: NSW will request a permit to construct the Project, which will consist of an up to a 450 MW solar PV Generating Facility, a 345 kV Project Substation, a 345 kV Gen-Tie, an up to 200 MW BESS, and associated facilities, including fencing and access roads, to be located within Washoe County, NV.

The contents of the Application to be submitted to the PUCN for the Project will include but are not limited to:

1. A description of the Project, including general and detailed descriptions of the location of the Project, appropriately scaled site plan and layout drawings, vicinity maps, and routing maps; a description of the size and nature of the Project; and a description of the natural resources that will be used during the construction and operation of the Project;

2. A copy and summary of the Environmental Statement prepared by Universal Engineering Sciences, Inc. with respect to the environmental impact of the Project; an explanation of the nature of the probable effect of the Project on the environment; and a description of the current environmental characteristics of the Project area, the environmental impacts that the construction and operation of the Project would have on the Project area before mitigation, and the environmental impacts that the construction and operation of the Project will have on the Project area after mitigation;

3. A description of any reasonable alternate locations for the Project, a description of the comparative merits or detriments of each location submitted, and a statement of the reasons why the location is best suited for the Project;

4. An explanation of the extent to which the Project is needed to ensure reliable utility service to customers in this State of Nevada, including a description of the extent to which the Project will provide and enhance utility service to customers in Nevada;

5. An explanation of how the need for the Project balances any adverse effects on the environment, and how the Project represents the minimum adverse effect on the environment;

6. An explanation of how the location of the Project conforms to applicable federal, state, and local laws and regulations; and

7. An explanation of how the Project will serve the public interest, including the economic benefits that the Project will bring to the state, and the nature of the probable effect on the public health, safety, and welfare of the residents of the state if the Project is constructed.

A copy of the Application will be available on the PUCN's website following Applicant's filing of the Application. Additional information about the UEPA process and a person's right to participate in that process can be found in Nevada Revised Statutes Chapter 704 and Nevada Administrative Code Chapter 703. Protests and written comments about the Application and the Project must be filed with the PUCN as provided by law. DATED this 18th day of September, 2025 by NVSolarWRX, LLC.

EXHIBIT I

Affidavit of Publication

LocaliQ
Nevada/Utah
GANNETT

P.O. Box 632098, Cincinnati, OH 45263-2098

AFFIDAVIT OF PUBLICATION

Holland & Hart LLP
555 17Th ST # 3200
Denver CO 80202-3921

STATE OF WISCONSIN, COUNTY OF BROWN

Being first duly sworn, deposes and says: That as the legal clerk of the Reno Gazette-Journal, a daily newspaper of general circulation published in Reno, Washoe County, State of Nevada that the notice hereto annexed was Published in said newspapers in the issue:

09/21/2025

and that the fees charged are legal.
Sworn to and subscribed before on 09/21/2025

Legal Clerk

Notary, State of WI, County of Brown

9-3-29
My commission expires

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Notary Public
State of Wisconsin

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

NOTICE OF APPLICATION FOR A PERMIT TO CONSTRUCT A UTILITY FACILITY UNDER THE UTILITY ENVIRONMENTAL PROTECTION ACT

NVSolarWRX, LLC ("NSW" or the "Applicant") is submitting, pursuant to the Nevada Utility Environmental Protection Act ("UEPA"), an application to the Public Utilities Commission of Nevada ("PUCN") for a permit to construct a 450 megawatt ("MW") solar photovoltaic ("PV") generating facility ("Generating Facility"); a 345 kilovolt ("kV") substation ("Project Substation"); an approximately 7-mile-long, 345 kV overhead generation-tie line ("Gen-Tie"); and associated facilities, including a battery energy storage system ("BESS") with a capacity of up to 200 MW, in Washoe County, Nevada (the "Project") pursuant to Nevada Revised Statutes Chapter 704.820 through .900, inclusive, and Nevada Administrative Code Chapter 703.415 through .427, inclusive (the "Application"). The Project will provide renewable energy to the electrical transmission grid via the existing Fort Sage Substation, which is owned and operated by Sierra Pacific Power Company d/b/a NV Energy ("SPPCo"). The Project will consist of five basic components: (1) an up to 450 MW alternating current solar PV Generating Facility; (2) a 345 kV Project Substation; (3) a 345 kV overhead Gen-Tie which will travel roughly 7 miles from the Project Substation to the existing SPPCo Fort Sage Substation; (4) an up to 200 MW capacity BESS; and (5) associated facilities and components, including access roads and fencing.

The Project will be located on approximately 1,692 acres of private land located in unincorporated Washoe County, within the sparsely populated Honey Lake Valley near the Nevada/California state line, approximately 40 miles north of the City of Reno and 9 miles east of Herlong, California. The Project site consists of the following: (1) the Project property, which consists of 4 adjoining parcels totaling approximately 1,680 acres; and (2) 7 linear miles (approximately 12 acres) of an existing private access and utility easement – specifically, within the Truckee Meadows Regional Planning Agency's designated Rainbow Way 345 kV Regional Utility Corridor – extending west from the Property two miles to Rainbow Way and continuing five miles south along Rainbow Way to the Fort Sage Substation. The Project will result in the disturbance of approximately 1,692 acres of land in total, and construction will last up to approximately 7 months and take place in 4 phases. Universal Engineering Sciences, Inc. conducted an environmental review of the Project and prepared an Environmental Statement which is included with the Application.

NOTICE OF THE APPLICATION FOR A PERMIT TO CONSTRUCT UNDER UEPA FOR A 450 MW SOLAR PV GENERATING FACILITY, 345 kV PROJECT SUBSTATION, 345 kV GEN-TIE, AN UP TO 200 MW CAPACITY BESS, AND ASSOCIATED FACILITIES.

Notice is hereby given to persons residing in the municipalities in which any portion of the Project will be located and constructed: NSW will request a permit to construct the Project, which will consist of an up to a 450 MW solar PV Generating Facility, a 345 kV Project Substation, a 345 kV Gen-Tie, an up to 200 MW BESS, and associated facilities, including fencing and access roads, to be located within Washoe County, NV.

The contents of the Application to be submitted to the PUCN for the Project will include but are not limited to:

1. A description of the Project, including general and detailed descriptions of the location of the Project, appropriately scaled site plan and layout drawings, vicinity maps, and routing maps; a description of the size and nature of the Project; and a description of the natural resources that will be used during the construction and operation of the Project;

2. A copy and summary of the Environmental Statement prepared by Universal Engineering Sciences, Inc. with respect to the environmental impact of the Project; an explanation of the nature of the probable effect of the Project on the environment; and a description of the current environmental characteristics of the Project area, the environmental impacts that the construction and operation of the Project would have on the Project area before mitigation, and the environmental impacts that the construction and operation of the Project will have on the Project area after mitigation;

3. A description of any reasonable alternate locations for the Project, a description of the comparative merits or detriments of each location submitted, and a statement of the reasons why the location is best suited for the Project;

4. An explanation of the extent to which the Project is needed to ensure reliable utility service to customers in this State of Nevada, including a description of the extent to which the Project will provide and enhance utility service to customers in Nevada;

5. An explanation of how the need for the Project balances any adverse effects on the environment, and how the Project represents the minimum adverse effect on the environment;

6. An explanation of how the location of the Project conforms to applicable federal, state, and local laws and regulations; and

7. An explanation of how the Project will serve the public interest, including the economic benefits that the Project will bring to the state, and the nature of the probable effect on the public health, safety, and welfare of the residents of the state if the Project is constructed.

A copy of the Application will be available on the PUCN's website following Applicant's filing of the Application. Additional information about the UEPA process and a person's right to participate in that process can be found in Nevada Revised Statutes Chapter 704 and Nevada Administrative Code Chapter 703. Protests and written comments about the Application and the Project must be filed with the PUCN as provided by law. DATED this 18th day of September, 2025 by NVSolarWRX, LLC.

September 21 2025
LNVS0374189

EXHIBIT J

Proof of Submission

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Holland & Hart LLP and on October 1, 2025, I caused to be served a true and correct copy of the foregoing document to the following:

ELECTRONIC MAIL

Nevada State Clearinghouse
Department of Conservation & Natural Resources,
Division of State Lands
901 S. Stewart Street, Ste. 5003
Carson City, NV 89701
nevadaclearinghouse@lands.nv.gov

ELECTRONIC MAIL

Jennifer Carr
Nevada Division of Environmental Protection
901 S. Stewart Street, Suite 4001
Carson City, NV 89701
Jcarr@ndep.nv.gov

ELECTRONIC MAIL

Staff Counsel Support
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701-3109
Pucn.sc@puc.nv.gov

ELECTRONIC MAIL

Ernest Figueroa, Esq.
Nevada State Consumer Advocate
Bureau of Consumer Protection
100 N. Carson Street
Carson City, NV 89701
bcpserv@ag.nv.gov

U.S. MAIL TRANSMITTAL:

Washoe County Clerk
1001 E 9th Street
Reno, NV 89512

/s/Cecilia Martin
Cecilia Martin, Legal Secretary
an employee of Holland & Hart LLP

HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

EXHIBIT K

Permits and Approvals

PHASE 1: SITE GRADING & TEMPORARY CONSTRUCTION FACILITIES		
REQUIRED PERMIT	**ISSUING AGENCY**	**ESTIMATED APPROVAL**
Special Use Permit and Major Grading approvals	Washoe County	Q4 2025
Dust Permit	Washoe County	Q1 2026
Fugitive Dust Permit	Nevada Department of Environmental Protection	Q4 2025
Water Discharge Permit	Nevada Department of Environmental Protection	Q4 2025
Confirmation of receipt of Application and payment for energy review program under NRS 701.600-701.640	Nevada Department of Wildlife	Q3 2025
PHASE 2: GENERATING FACILITY & ACCESS ROADS		
REQUIRED PERMIT	**ISSUING AGENCY**	**ESTIMATED APPROVAL**
Special Use Permit and Major Grading approvals	Washoe County	Q4 2025
Dust Permit	Washoe County	Q1 2026
Fugitive Dust Permit	Nevada Department of Environmental Protection	Q4 2025
Water Discharge Permit	Nevada Department of Environmental Protection	Q4 2025
Building and Grading Permit	Washoe County	Q1 2026
PHASE 3: PROJECT SUBSTATION & BESS		
REQUIRED PERMIT	**ISSUING AGENCY**	**ESTIMATED APPROVAL**
Special Use Permit and Major Grading approvals	Washoe County	Q4 2025
Dust Permit	Washoe County	Q1 2026
Fugitive Dust Permit	Nevada Department of Environmental Protection	Q4 2025
Water Discharge Permit	Nevada Department of Environmental Protection	Q4 2025
Building and Grading Permit	Washoe County	Q1 2026
PHASE 4: Gen-Tie		
REQUIRED PERMIT	**ISSUING AGENCY**	**ESTIMATED APPROVAL**
Special Use Permit approvals	Washoe County	Q4 2025

Dust Permit	Washoe County	Q1 2026
Fugitive Dust Permit	Nevada Department of Environmental Protection	Q4 2025

Attachment 1

State of Nevada

DEPARTMENT OF WILDLIFE

6980 Sierra Center Parkway, Suite 120
Reno, Nevada 89511
(775) 688-1500 • Fax (775) 688-1595

JOE LOMBARDO
Governor

ALAN JENNE
Director

CALEB MCADOO
Deputy Director

JORDAN GOSHERT
Deputy Director

MICHAEL SCOTT
Deputy Director

August 26, 2025

Brent Moore
Ultreia Group
807 2nd Street
Verdi, NV 89439
(916) 712-9707
Brent@ultreiagroupinc.com

Re: Energy Planning and Conservation Program Receipt of Application
NVSolarWRX Project

Dear Mr. Albert,

On behalf of the Nevada Department of Wildlife (NDOW), I am writing to acknowledge receipt of application and payment for the energy review program established under NRS 701.600-701.640. Included is a table of our estimated costs for project review of the NVSolarWRX Project in Washoe County, NV.

Katie Andrle is the Western Region Supervisor in the Habitat Division who will be your point of contact for the review activities. You can reach her directly by phone at (775) 688-1145 or by email at kmandrle@ndow.org.

Should we require anything else we will be in contact.

Sincerely,

Astrea Strawn
Wildlife Staff Specialist
Habitat Division
(775) 688-1561
Astrawn@ndow.org

cc: Katie Andrle, Western Region Supervisor, Habitat Division

Estimated costs for NDOW technical review for the NVSolarWRX Project.

NDOW staff role	Activities	Hours	Hourly rate (average)	Estimated cost
Wildlife Staff Specialist, Habitat Division, Technical Review Lead	Review application, update reporting database, incorporate activity into annual report, produce correspondence for proponent, review mapping activities, coordinate with regional and other staff, manage review timelines, coordinate with external agencies, track budget	21	$57.29	$1,203.09
GIS Staff Specialist	Produce map products from project description and footprint; produce correspondence to proponent on maps.	8	$57.29	$458.32
Regional Biologists (Habitat, Game, Diversity, Fisheries)	Provide project specific input, coordinate with field staff to gather additional input, assess baseline data, develop monitoring and assessment protocol, manage monitoring and assessment protocol	21	$54.95	$1,153.95
Field Biologists (Habitat, Game, Diversity, Fisheries)	Provide project specific input, coordinate with regional staff to provide baseline data and additional input, implement monitoring and assessment protocol, report on monitoring and assessment activities	135	$50.67	$6,840.45
Admin Assistant	Receive and transmit deposit, forward proponent paperwork	1.75	$37.20	$65.10
Fiscal Officer	Manage finances, produce annual budget reporting	5	$59.69	$298.45
Total				$10,019.36

EXHIBIT L

Draft Notice

HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

PUBLIC UTILITIES COMMISSION OF NEVADA
DRAFT NOTICE

(Applications, Tariff Filings, Complaints, and Petitions)

Pursuant to Nevada Administrative Code ("NAC") 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include **ONE COPY** of this form with your filing. (Completion of this form may require the use of more than one page.)

A title that generally describes the relief requested (see NAC 703.1605(4)(a)):

Application of NVSOLARWRX, LLC for a permit to construct a 450 MW solar generating facility; a 345 kV project substation; a 345 kV overhead generation-tie line; and associated facilities, including an energy storage system, to be located in Washoe County, Nevada, pursuant to the Utility Environmental Protection Act ("UEPA").

The name of the applicant, complainant, petitioner or the name of the agent of the applicant, complainant or petitioner (see NAC 703.160(4)(b)):

NVSOLARWRX, LLC (the "Applicant").

A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled **AND** the effect of the proceeding upon customers (see NAC 703.160(4)(c)).

The Applicant files this Application pursuant to UEPA for a permit to construct facilities to be known as the NVSolarWRX Project (the "Project"). The Project will include a 450 MW alternating current solar photovoltaic energy generating facility; a 345 kV on-site project substation, an approximately 7-mile-long, 345 kV generation-tie line, and associated facilities, including a 200 MW battery energy storage system. The Project will provide renewable energy to the electrical transmission grid via the existing Fort Sage Substation, which is owned and operated by Sierra Pacific Power Company d/b/a NV Energy. The Project will also require civil infrastructure, including perimeter fencing and access roads.

The Project will be located on approximately 1,692 acres of private land, including an approximately 1,680-acre property and an approximately 12-acre portion of existing access and utility easements located along Rainbow Way, a designated Truckee Meadows Regional Planning Agency Regional Utility Corridor, in Washoe County, Nevada. The Application includes a description of the Environmental Statement, which was prepared to analyze the Project's potential impacts on a variety of resources and concluded that the Project will not have a material adverse impact on the environment.

The Application is filed pursuant to the requirements of NRS 704.820 to 704.900 and NAC 703.415 to 703.427.

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute ("NRS" 704.069(1)).

A consumer session is not required by NRS 704.069.

If the draft notice pertains to a tariff filing, please include the tariff number AND the section number(s) of the schedule number(s) being revised.
This Application does not pertain to a tariff filing.

35487610_v7

HOLLAND & HART LLP
5470 KIETZKE LANE, SUITE 100
RENO, NV 89511-2094

CLERK OF THE COURT

MONTHLY FINANCIAL STATEMENT

STATE OF NEVADA, COUNTY OF WASHOE

Month Ending August 31, 2025

Alicia L. Lerud, Clerk of the Court, in compliance with NRS 19.090,and being first duly sworn, and under penalty of perjury, deposes and says that the following is a full and correct statement of all fees, percentages or compensation received in my official capacity during the preceding month:

Clerk of the Court	Law Library Fund	$	6,660.00
	Additional Divorce Filing Fee	$	175.00
	*County General Fund	$	120,908.50
	eFile Fee (General Fund)	$	15,900.00
	State Civil Fee	$	20,240.00
	Legal Aid Filing Fee	$	27,963.00
	TOTAL		$191,846.50

Alicia L. Lerud
District Court Administrator/Clerk of Court

* Included in County General Fund are the following fees: balance of civil action, certified copies of all miscellaneous.

CASH REGISTER READOUT	
T,R, Rec.No, (Doc. No)	

UNIT ID. CLERK - JUDICIAL
Date: September 2, 2025

FOR AUDIT AND CONTROL PURPOSES PLEASE INDICATE THE REASON FOR THIS COLLECTION.
(Attach any additional document if this would help to clarify the collection.)

DISTRICT COURT FEES COLLECTED FOR August 2025

ACCOUNTS TO BE CREDITED					AMOUNT		
		ACCOUNTING CODE NUMBERS					
CR/GF/OP	ACCOUNT DESCRIPTION	ORDER	COST CENTER	ACCOUNT			
OP	Legal Aid (Washoe Legal Services) (01)		990023	441007	14,544.00	legalaid	$ 27,963.00
OP	Legal Aid (Elderly Indigent) Sr. Center (02)		250411	460720	5,064.00		
OP	State Civil (03)		990019	441022	13,920.00	state civil	$ 20,240.00
GF	Law Library (04)		123100	460222	6,660.00	law library	$ 6,660.00
GF	Clerk Fees (05,6,7)		120101	460210	31,276.50	general	$ 136,808.50
CR	DC Technology SB106 (06)	20038	120105	460210	592.00		
OP	Legal Aid (Washoe Legal Services) (08)		990023	441078	8,355.00		
GF	Additional Divorce Answer Fee (09)		120231	460220	175.00	add'l div	$ 175.00
GF	Mediation (10)		120331	471205	3,065.00		
OP	Neighborhood Justice Center (10J)		270710	460225	3,065.00		
GF	Arbitration (11)		120111	471215	-	TOTAL:	$ 191,846.50
OP	Displaced Homemakers (12)		990019	441021	3,810.00		
GF	Divorce Training (13)		120231	460223	650.00		
GF	Family Mediation Fee (14)		120331	471210	1,400.00		
GF	CD Recording/Record on CD (15,17)		120311	485300	475.00		
OP	Vital Statistics (State of NV) (18)		990019	441004	1,300.00		
OP	State of NV (OAC / Tech) (19)		990019	441020	740.00		
OP	State of NV (OAC / Judges) (20)		990019	441019	370.00		
CR	Court Expansion Fees AB65 (21)	20326		460211	66,945.00		
CR	Court Security Fees AB65 (22)	20335		460213	12,260.00		
CR	Mtn to Modify Div SB388	20408		460214	616.00		
CR	Opp Mtn to Mod Div SB388	20409		460215	164.00		
GF	eFile Subscription		120106	460212	15,900.00		
GF	Attorney ID Badge Fee		120101	485320	-		
GF	Attorney ID Badge Fee PW		160100	485100	-		
GF	Law Library Fine/Fee		123100	485100	-		
OP	Foreclosure Mediation State (34)		990019	460121	100.00		
GF	Foreclosure Mediator (35)	20444		460220	400.00		
GF	Over/Short (Filing Office)		120231	711300			
				TOTAL	$ 191,846.50		

Prepared By: Valerie Moser

ACCEPTED BY: Justin Taylor
Washoe County Treasurer

Rev 05/07

OFFICE OF THE
WASHOE COUNTY TREASURER

MONTHLY STATEMENT OF WASHOE COUNTY TREASURER FOR
MONTH ENDING August 31, 2025

BOARD OF COUNTY COMMISSIONERS
WASHOE COUNTY
RENO, NEVADA

RE: NRS 354.280

Honorable Commissioners:

I hereby submit this summary record of the source and amount of all receipts, apportionments to, payments from and balances in all funds and separate accounts as required by referenced statute. Detailed information is available in my office.

CASH ON DEPOSIT	OUTSTANDING	BOOK BALANCE
$38,172,444.28	$1,160,280.14	$37,012,164.14

INVESTMENTS (Reported at Market – All Groups)
$1,157,324,058.87

Unapportioned Funds (Secured & Unsecured)			
Washoe County	Restricted Funds	Other Agencies	Total
$404,409.26	$132,315.03	$792,929.57	$1,329,853.86

Linda Jacobs

Digitally signed by Linda Jacobs
Date: 2025.09.11 15:52:35 -07'00'

Linda Jacobs, Chief Deputy Treasurer

ADMINISTRATION COMPLEX
1001 EAST NINTH STREET
SUITE D-140

PO BOX 30039
RENO, NEVADA 89520-3039

PHONE (775) 328-2510
FAX (775) 328-2500
www.washoecounty.gov/treas

CLERK OF THE COURT

MONTHLY FINANCIAL STATEMENT

STATE OF NEVADA, COUNTY OF WASHOE

Month Ending September 30, 2025

Alicia L. Lerud, Clerk of the Court, in compliance with NRS 19.090,and being first duly sworn, and under penalty of perjury, deposes and says that the following is a full and correct statement of all fees, percentages or compensation received in my official capacity during the preceding month:

Clerk of the Court	Law Library Fund	$	6,540.00
	Additional Divorce Filing Fee	$	150.00
	*County General Fund	$	120,316.00
	eFile Fee (General Fund)	$	19,500.00
	State Civil Fee	$	19,835.00
	Legal Aid Filing Fee	$	25,899.00
	TOTAL		$192,240.00

Alicia L. Lerud
District Court Administrator/Clerk of Court

* Included in County General Fund are the following fees: balance of civil action, certified copies of all miscellaneous.

CASH REGISTER READOUT	
T.R. Rec.No. (Doc. No)	

UNIT ID. CLERK - JUDICIAL
Date: October 2, 2025

FOR AUDIT AND CONTROL PURPOSES PLEASE INDICATE THE REASON FOR THIS COLLECTION.
(Attach any additional document if this would help to clarify the collection.)

DISTRICT COURT FEES COLLECTED FOR Sept 2025

		ACCOUNTS TO BE CREDITED			AMOUNT		
		ACCOUNTING CODE NUMBERS					
CR/GF/OP	ACCOUNT DESCRIPTION	ORDER	COST CENTER	ACCOUNT			
OP	Legal Aid (Washoe Legal Services) (01)		990023	441007	13,608.50	legalaid	$ 25,899.00
OP	Legal Aid (Elderly Indigent) Sr. Center (02)		250411	460720	4,715.50		
OP	State Civil (03)		990019	441022	13,760.00	state civil	$ 19,835.00
GF	Law Library (04)		123100	460222	6,540.00	law library	$ 6,540.00
GF	Clerk Fees (05,6,7)		120101	460210	30,453.00	general	$ 139,816.00
CR	DC Technology SB106 (06)	20038	120105	460210	408.00		
OP	Legal Aid (Washoe Legal Services) (08)		990023	441078	7,575.00		
GF	Additional Divorce Answer Fee (09)		120231	460220	150.00	add'l div	$ 150.00
GF	Mediation (10)		120331	471205	2,900.00		
OP	Neighborhood Justice Center (10J)		270710	460225	2,900.00		
GF	Arbitration (11)		120111	471215	-	TOTAL:	$ 192,240.00
OP	Displaced Homemakers (12)		990019	441021	3,930.00		
GF	Divorce Training (13)		120231	460223	665.00		
GF	Family Mediation Fee (14)		120331	471210	1,600.00		
GF	CD Recording/Record on CD (15,17)		120311	485300	575.00		
OP	Vital Statistics (State of NV) (18)		990019	441004	1,330.00		
OP	State of NV (OAC / Tech) (19)		990019	441020	510.00		
OP	State of NV (OAC / Judges) (20)		990019	441019	255.00		
CR	Court Expansion Fees AB65 (21)	20326		460211	68,163.00		
CR	Court Security Fees AB65 (22)	20335		460213	11,600.00		
CR	Mtn to Modify Div SB388	20408		460214	770.00		
CR	Opp Mtn to Mod Div SB388	20409		460215	82.00		
GF	eFile Subscription		120106	460212	19,500.00		
GF	Attorney ID Badge Fee		120101	485320	-		
GF	Attorney ID Badge Fee PW		160100	485100	-		
GF	Law Library Fine/Fee		123100	485100	-		
OP	Foreclosure Mediation State (34)		990019	460121	50.00		
GF	Foreclosure Mediator (35)	20444		460220	200.00		
GF	Over/Short (Filing Office)		120231	711300			
				TOTAL	$ 192,240.00		

Prepared By: Valerie Moser

ACCEPTED BY: Justin Taylor
Washoe County Treasurer

OFFICE OF THE
WASHOE COUNTY TREASURER

MONTHLY STATEMENT OF WASHOE COUNTY TREASURER FOR
MONTH ENDING September 30, 2025

BOARD OF COUNTY COMMISSIONERS
WASHOE COUNTY
RENO, NEVADA

RE: NRS 354.280

Honorable Commissioners:

I hereby submit this summary record of the source and amount of all receipts, apportionments to, payments from and balances in all funds and separate accounts as required by referenced statute. Detailed information is available in my office.

CASH ON DEPOSIT	OUTSTANDING	BOOK BALANCE
$30,596,610.32	$1,650,224.12	$28,946,386.20

INVESTMENTS (Reported at Market – All Groups)
$1,031,094,039.80

Unapportioned Funds (Secured & Unsecured)			
Washoe County	Restricted Funds	Other Agencies	Total
$13,590,273.37	$3,648,087.99	$27,942,059.01	$45,180,420.37

Linda Jacobs

Digitally signed by Linda Jacobs
Date: 2025.10.13 07:22:06 -07'00'

Linda Jacobs, Chief Deputy Treasurer

ADMINISTRATION COMPLEX
1001 EAST NINTH STREET
SUITE D-140

PO BOX 30039
RENO, NEVADA 89520-3039

PHONE (775) 328-2510
FAX (775) 328-2500
www.washoecounty.gov/treas

University of Nevada, Reno

UNIVERSITY-ORGANIZATION AGREEMENT
For Service-Learning, Internship or Field-Study Placement

This agreement entered into this __1___day of __November_____, 2021__, between the Board of Regents of the Nevada System of Higher Education on behalf of the University of Nevada, Reno ("University") and __Washoe County Juvenile Services (the "Learning Site"), to provide for the placement and education of students in a service learning or internship learning experience ("Learning Activity").

1. Term: The Term of this Agreement shall be for five (5) years. The Term shall commence on July 1, 2021 and shall end on June 30, 2026.

2. Responsibility of the University:

2.1 The University shall provide coordination in facilitating communication between the University and/or faculty designee, the student, and the site supervisor for the Learning Site (the "Site Supervisor").

2.2 The University and/or faculty designee shall be available for consultation with both the Site Supervisor and the student in the event of any disagreement or problems concerning requirements.

2.3 The University shall be responsible for planning and execution of the education phase, including curriculum, administration, faculty appointments, and customary University functions, such as granting degrees and advising students.

2.4 The University shall advise the student of his or her responsibility to:

a. Participate in all training required by the Learning Site.
b. Exhibit professional, ethical and appropriate behavior when at the Learning Site.
c. Complete all assigned tasks and responsibilties in a timely and efficient manner.
d. Adhere to the policies, procedures, rules, standards and regulations of the Learning Site.
e. Maintain the confidentiality of the Learning Site's proprietary information, records and information concerning its clients.
f. Get a background check, a tuberculosis test, fingerprints and any other training and/or testing requirements if the Learning Site requires them.

3. Responsibilities of the Site:

3.1 **Orientation**. The Learning Site shall provide an orientation that includes a site tour, where applicable, an introduction to staff, a description of the characteristics of and risks associated with the Learning Site's operations, services and/or clients, a discussion concerning safety policies and emergency procedures, mandated reporting requirements and information detailing where students check-in and how they log their time.

3.2 **Site Supervision**. The Learning Site shall provide a supervised on-site experience. The Learning Site shall provide a supervisor, who shall meet with the student to provide support and to review progress on assignments and activities.

3.3 **Training**. The Learning Site shall provide appropriate training, equipment, materials and work space for students to conduct professional activities appropriate to the Learning Activity.

3.4 **Evaluation.** The Learning Site shall evaluate the student if requested by the University and contact the University if the student fails to perform assigned tasks or engages in misconduct.

3.5 **Safety**.

a. The Learning Site shall notify the University as soon as is reasonably possible of any injury or illness to a student participating in a Learning Site activity. The Learning Site agrees to arrange emergency care or provide first aid to students in the event of an accident, injury or illness resulting from the Learning Site activity.

b. The Learning Site shall not ask the student to transport any person, unless the Learning Site maintains business automobile liability insurance coverage for the student.

c. The Learning Site shall inform the student of any need for a background check, fingerprinting and/or a tuberculosis test, ensure that the student obtains the student's fingerprints, background check and/or tuberculosis test and maintain the confidentiality of any results as required by federal and state law. The University does not perform background checks, fingerprinting or drug testing of its students.

4. Status of Student:

4.1 Each party agrees that the student will be in a learning situation and that the primary purpose of the Learning Activity is for the student's learning. While engaged in the Learning Activity, the student shall retain the status of a student working towards the fulfillment of a degree requirement. The student is not an employee, agent, independent contractor or volunteer of the University.

4.2 With the exception of situations where the student is undertaking the Learning Activity as a paid employee of the Learning Site, the student shall not displace regular employees of the Learning Site.

To the extent that the student is participating in a paid internship or paid Learning Activity, the student shall be considered an employee of the Learning Site. The student shall be paid by the Learning Site and the student shall be covered under the Learning Site's worker's compensation and liability insurance.

5. Discipline of Student

5.1 The Learning Site may remove the student from placement for violating Learning Site rules or regulations and professional codes/standards for such actions as the Learning Site views as detrimental to its operations. The Learning Site shall notify the University immediately after final action is taken.

5.2 The University shall have full responsibility for the conduct of any student academic or disciplinary proceedings and shall conduct the same in accordance with all applicable codes, statutes, rules, regulations and law.

6. Insurance

6.1 The Learning Site shall procure and maintain General Liability insurance, comprehensive or commercial form with $1,000,000 minimum limit for each Occurrence and minimum limit of $2,000,000 General Aggregate or provide documentation that the Learning Site is self-Insured. If the Learning Activity provides services that are medical or clinical in nature, the Learning Site shall maintain medical malpractice insurance with limits of at least $1,000,000 per claim and $3,000,000 annual aggregate for each of its medical staff personnel and ensure that any contracted medical providers have current medical malpractice insurance in amounts equal to those provided by the Learning Site. The Learning Site shall procure and maintain Workers Compensation insurance if required by applicable state statute. If the student is participating in a paid internship or paid Learning Activity, the student shall be considered an employee of the Learning Site and shall be covered under the Learning Site's worker's compensation and liability insurance. If the student is not being paid, the student shall be considered a volunteer and the Learning Site shall provide insurance coverage for the volunteering student either under its workers' compensation policy or a volunteer accident insurance policy. The University shall be named as an additional insured for general liability arising from this Agreement and be added to the insurance policy as an "additional insured".

6.2 NSHE is self-insured for its general liability exposure in accordance with the provisions of NRS Chapter 41. As a state agency, the University and NSHE are included in this self-insured program.

7. Indemnification

7.1 Indemnification by Learning Site. The Learning Site shall indemnify, defend and hold harmless the University, its regents, officers, employees, agents and representatives from any and all claims, damages, losses, liabilities, liens, costs and/or expenses, including attorneys' fees, controversies, causes of action, lawsuits, proceedings, injuries (including death) and judgments arising either directly or indirectly from any act or failure to act by the Learning Site or any of its officers, employees or agents, which may occur during or which may arise out of the performance of this Agreement.

7.2 Indemnification by University. To the extent limited in accordance with NRS 41.0305 to NRS 41.039, the University shall indemnify, defend, and hold harmless Learning Site from any and all claims, damages, losses, liabilities, liens, costs and/or expenses, including attorneys' fees, controversies, causes of action, lawsuits, proceedings, injuries (including death) and judgments, arising either directly or indirectly from any act or failure to act by the University or any of its regents, officers, employees or agents, which may occur during or which may arise out of the performance of this Agreement. The University shall assert the defense of sovereign immunity as appropriate in all cases, including malpractice and indemnity actions. University's indemnity obligation for actions sounding tort is limited in accordance with the provisions of NRS 41.035 and any award for damages under NRS 41.035 may not exceed the sum of $150,000 if awarded on or after July 1, 2020 and may not exceed the sum of $200,000 if awarded on or after July 1, 2022.

8. Compliance With Federal, State and Local Laws. Each party shall continue to be in compliance with all applicable federal, state and local laws, codes, regulations, rules and orders.

8.1 **Discrimination.** Both parties agree to fully comply with all applicable state and federal non-discrimination laws. The Learning Site agrees to accept, assign, supervise, and evaluate qualified students regardless of a student's age, disability, whether actual or perceived by others (including service-connected disabilities), gender (including pregnancy related condition), military status or military obligations, sexual orientation, gender identity or expression, genetic information, national origin, race, or religion.

9. Confidentiality of Records

9.1 The Learning Site agrees to treat all records relating to the student confidentially and not to disclose student records except to the University and Learning Site officials who have a legitimate interest in the information, consistent with their official responsibilities.

9.2 The parties agree to comply with the Family Educational Rights and Privacy Act of 1974 ("FERPA"), and all requirements imposed by or pursuant to regulation of the Department of Education and the University to the end that the rights and privacy of the students enrolled in the University are not violated or invaded. No access to individual student data shall be granted by the parties to any other person, agency or organization without the written consent of the student, except for sharing with other persons within the University or the Learning Site, so long as those persons have a legitimate interest in the information.

10. Termination:

10.1 This Agreement may be terminated by either party for any reason upon ninety (90) days prior written notice.

10.2 Notwithstanding any termination under this Agreement, once a student has been accepted by the Learning Site, and so long as the student remains in good standing in the University and within the Learning Site's performance standards, and the student's assignment has not otherwise ended, the student shall be allowed to finish his or her Learning Activity experience at the Learning Site.

11. Miscellaneous

11.1 **Entire Agreement.** This Agreement contains the entire understanding of the parties with respect to the subject matter hereof and supersedes all prior agreements, oral or written, and all other communications between the parties relating to such subject matter. This Agreement may not be amended, supplemented or modified except by mutual written agreement by the parties.

11.2 **Invalid Provisions.** If any provision of this Agreement is held to be invalid or unenforceable for any reason, this Agreement shall remain in full force and effect in accordance with its terms, disregarding such unenforceable or invalid provision.

11.3 **Force Majeure.** Neither party shall be deemed to be in violation of this Agreement if it is prevented from performing any of its obligations hereunder due to strikes, failure of public transportation, civil or military authority, governmental restrictions, governmental regulations, governmental controls, act of public enemy, pandemics, epidemics or other outbreaks of diseases or other infections accidents, fires, explosions, or acts of God, including, without limitation, earthquakes, floods, winds, or storms. In such an event the intervening

cause must not be through the fault of the party asserting such an excuse, and the excused party is obligated to promptly perform in accordance with the terms of the Agreement after the intervening cause ceases.

11.4 Governing Law. This Agreement shall be governed, interpreted, construed and enforced in accordance with the laws of the State of Nevada, with venue in the City of Reno and County of Washoe.

11.5 **Assignment.** A party may not assign or transfer any of its rights, duties or obligations under this Agreement, in whole or in part, without the prior written consent of the other party.

11.6 **Binding Effect.** This Agreement shall be binding upon and inure to the benefit of the parties hereto, and their respective successors and assigns, and no other party shall be a beneficiary hereunder.

11.7 **Notice.** Notices required by this Agreement shall be in writing, delivered personally, by certified or registered mail, or by overnight courier, and shall be deemed to have been given when delivered personally or when deposited in the United States mail, postage pre-paid, or with an overnight courier, addressed as follows:

To Learning Site:

Name: Catherine Mees
Company: Washoe County Juvenile Services
Address: 650 Ferrari-McLeod Reno NV. 89512
Phone:775-325-7886
Email: cmees@washoecounty.gov

To University:

David K. Shintani
Vice Provost, Undergraduate Education
University of Nevada, Reno
1664 N. Virginia Street Clark Admin 110
Reno, Nevada 89557
Telephone No.: 775-784-1740
Email: shintani@unr.edu

11.8 **No Joint Venture.** In no event shall this Agreement be construed as establishing a partnership, joint venture or similar relationship between the parties hereto. Each party is an independent contractor, and neither is the agent, employee or servant of the other, and each is responsible only for its own conduct.

11.9 **Use of Name or Logo.** Nothing contained in this Agreement confers on either party the right to use the other party's name without prior written permission, or constitutes an endorsement of any commercial product or service by the University.

11.10 **Counterparts.** This Agreement may be executed in any number of counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

LEARNING SITE

__Washoe County Juvenile Services __
(Name)

Approved:

Signed: Catherine Mees
Printed: Catherine Mees
Title: Probation officer
Date: 11/1/21

BOARD OF REGENTS OF THE NEVADA SYSTEM OF HIGHER EDUCATION, ON BEHALF OF THE UNIVERSITY OF NEVADA, RENO

Recommended By:

By _____
Nevada Career Studio/OSCLE

Approved:

_____
David K. Shintani
Vice Provost Undergraduate Education
Date: 11/10/21