

DATE: December 19, 2022

TO: Honorable Mayor and Members of the City Council through City Manager

- FROM: Diane Ramirez, Project Manager, Capital Improvements Program, PW&U Patrick Carter, Assistant to the City Manager Christopher J Bolt, MPA, PE, CPM, ICMA-CM, Director of Public Works & Utilities
- SUBJECT: Public Hearing to Make Findings Pursuant to Government Code Section 4217.12 and Resolution Approving and Certifying an Addendum to the Environmental Impact Report for the Ellis Creek Water Recycling Facility and Making a Finding of Exemption in Accordance with CEQA, Making Energy Savings Findings in Accordance with Government Code Section 4217.12, and Authorizing the City Manager to Execute All Documents Necessary for Entering a Power Purchase Agreement for a Floating Solar Array at the Ellis Creek Water Recycling Facility With Ellis Creek Solar LLC

RECOMMENDATION

It is recommended the Council conduct a public hearing to make findings pursuant to Government Code Section 4217.12 and consider a Resolution (Attachment 1) approving and certifying an addendum to the Environmental Impact Report for the Ellis Creek Water Recycling Facility and making a finding of exemption in accordance with CEQA, making energy savings findings in accordance with Government Code Section 4217.12, and authorizing the City Manager to execute all documents necessary for entering a power purchase agreement for a Floating Solar Array at the Ellis Creek Water Recycling Facility with Ellis Creek Solar LLC.

BACKGROUND

The City's Ellis Creek Water Recycling Facility (ECWRF) operates continuously throughout the year and is the City's largest electricity user. In July 2021, all City electric accounts were moved to Sonoma Clean Power's (SCP) Evergreen Power which provides electricity from renewable sources. Staff have discussed leasing one of its oxidation ponds at ECWRF to SCP for solar installation, but the best and most economical use of solar energy is onsite, "behind the meter" for direct consumption by the facility.

An action similar to this project is the power purchase agreement (PPA) with Forefront Power to

install photovoltaic arrays at the Petaluma Airport (now Community Sports Field), Community Center, Police Department, and Swim Center. Combined, these arrays would produce 629 kW-DC of solar capacity, offset 83% of the energy use for those four facilities, resulting in a Year 1 savings of \$53,576 and save the City nearly \$2.9 million over the 20-year agreement. PPA and Energy Services Agreement (ESA) are used interchangeably in this document.

Over the past few years, several solar developers have approached the City with interest to develop a floating solar project at ECWRF. Staff determined that installing a floating solar array on Pond #3 would provide the greatest value to the City with the least impact to Ellis Creek operations.

Accordingly, staff drafted a Request for Qualifications and Proposal (RFQ/RFP) and advertised it on the City website November 5, 2021. Six responses were received by December 8, 2021. Staff reviewed and scored the proposals and interviewed the four highest ranked firms. After interviewing the four firms, staff selected two firms to engage in additional discussions related to base PPA price with contract mechanisms to increase or decrease the PPA price as the design process moves forward and certain assumptions are evaluated and finalized. The two firms in the final round were selected for their previous experience with floating solar projects, knowledge of the design and utility interconnection process, willingness to adjust PPA pricing based on project scope increases or decreases, and willingness to implement design alterations to mitigate potential mosquito habitat.

Through this process, it became clear to staff that technical assistance would be required, especially with the added complexity of locating a solar array on a facility that provides an essential function in a relatively new location type (floating, as opposed to ground-, roof-, or canopy-mounted). Staff interviewed multiple firms with extensive experience in providing technical assistance and subsequently entered into an agreement with Sage Energy, which was later acquired by NV5. As this technical assistance is an essential part of this process and would not be required if the floating solar project had not been under consideration, the cost of NV5's assistance will be financed through the PPA. The City's payments under the PPA will cover the cost of NV5's services.

With NV5's technical support and assistance, staff conducted multiple question and answer sessions with both developers. Ultimately, staff selected White Pine for exclusive negotiations of a PPA for the Council's consideration. White Pine Renewables is a firm based in San Francisco and was the principal firm in the development of the City of Healdsburg's wastewater treatment plant floating solar array.

If approved by Council, the PPA will be executed with Ellis Creek Solar, LLC, a special-purpose entity of White Pine that staff have vetted and will hold all the assets of the Ellis Creek solar project, including all project contracts, permits, and physical equipment. White Pine owns 100% of the equity interests in the Ellis Creek Solar, LLC entity. The other solar projects owned by White Pine are set up in a similar manner. This structure is standard for the real estate and renewable energy industries, as it enables White Pine to raise "project financing" for each individual solar project. In the case of Ellis Creek, White Pine's financing partners will be focused on issuing debt to support the construction and long-term operations of the project, and the return on their investments will come as the project successfully operates over the term of the PPA. For

the purposes of this staff report, staff will refer to White Pine Renewables and Ellis Creek Solar, LLC as White Pine.

DISCUSSION

Project initiation requires execution of a PPA with White Pine, the selected solar developer (note once again that PPA and ESA are used interchangeably in this report). The attached PPA includes an initial 20-year term during which the City would agree to purchase renewable electricity generated at the ECWRF from White Pine at a specified rate beginning at \$0.0962/kWh and escalating by 1.9% each year after the array has achieved initial commercial operation. White Pine would plan, design, obtain permits, provide for CEQA compliance, finance, furnish, and install the necessary equipment, and would maintain the equipment and guarantee output for the 20-year term. Two optional five-year extensions of the term are included in the PPA. According to the analysis performed by NV5, this project will reduce electricity costs to the Wastewater Enterprise fund by \$508,000 in the initial year, and by \$13.10M over the initial 20-year term.

The original PPA rate proposed by White Pine in response to the RFP was \$0.0875/kWh. Through subsequent negotiations (which led to inclusion of reimbursement of NV5's costs in the PPA), additional costs determined through PG&E's interconnection agreement execution (which exceeded cost estimates included in the RFP) were incorporated, as well as the costs to mitigate mosquito abatement through design alterations. Thus, the final PPA rate offered by White Pine is \$0.0962/kWh. Despite the increased PPA rate, which staff has vetted and considers essential to this project, the estimated cost savings analysis performed by NV5 (Attachment 3 to this staff report) indicates a Year 1 savings of \$508,000.

Under the terms of the proposed PPA, White Pine would reimburse the City for upfront costs and the City would realize energy cost savings in the first year, with the reimbursement financed through the PPA rates paid by the City. Furthermore, the City would not be responsible to operate or maintain the systems as repairs, replacements, and other warranty claims throughout the entire PPA term would be performed by White Pine. The cost of purchasing energy through a PPA with White Pine would be lower over the term of the agreement than projected PG&E and/or Sonoma Clean Power costs. At the end of the initial term, the City could elect to extend the PPA, purchase the system from White Pine, or have the equipment decommissioned and removed from City property at White Pine's sole cost.

California Government Code 4217.10 authorizes a public entity to enter into energy services contracts, facility financing contracts, and related agreements to implement the State's conservation and alternative energy supply source policy. While staff conducted a competitive process in compliance with the Petaluma City Charter, and reliance on California Government Code 4217.10 is not mandatory, compliance with the Government Code and the City Charter and Municipal Code purchasing requirements ensures the lawfulness of this action and provides a framework for treating all of the energy services provided by White Pine, including the solar array design, fabrication, installation, operation, and maintenance, as a specialized professional services agreement. The attached resolution makes the necessary findings for energy conservation projects under the Government Code and provides Council authorization for the City to enter into the proposed power purchase agreement with White Pine.

The following documents are attached to this staff report:

- 1. Resolution approving an addendum to the Ellis Creek Water Recycling Facility Environmental Impact Report and authorizing the City Manager to execute all necessary documents for the City to enter into a power purchase agreement with White Pine
- 2. Energy Services Agreement with additional supporting exhibits and attachments
- 3. ECWRF Floating Solar Financial Analysis Memo from NV5
- 4. SPAR Determination Memo
- 5. Addendum No. 8 to the 2002 Water Recycling Facility and River Access Improvements Environmental Impact Report for the floating solar array project
- 6. Mitigation Monitoring Program for the Ellis Creek Water Recycling Facility Floating Solar Array Project

Power Purchase Agreement Components

The Energy Services Agreement (ESA) is the main document incorporating the Exhibits and Attachments comprising the total PPA with White Pine. The ESA establishes document precedence, definitions, project milestones, renewal terms, operational requirements, and payments related to monthly PPA costs, reimbursement, early termination, and buy-out. The ESA exhibits include:

- 1. Exhibit A System Description and Site Plan
- 2. Exhibit B Insurance
- 3. Exhibit C General Terms and Conditions with Attachments
 - a. Attachment A Site License
 - b. Attachment B Certain Agreements for the Benefit of Financing Parties
 - c. Attachment C Requirements Applicable to the Installation Work
 - d. Attachment D City of Petaluma Living Wage Ordinance Acknowledgement and Certification
- 4. Exhibit D Technical Specifications Scope of Work, Supplementary Criteria, Review Process, Submittals, Commissioning, Closeout
- 5. Exhibit E Site Specific Requirements
- 6. Exhibit F Performance Test
- 7. Exhibit G Sample Invoice

Exhibit C, the General Terms and Conditions, includes definitions, terms, and termination clauses; defines roles in the construction, installation, and system testing phases; and describes system operations, payment, general covenants, warrantees, force majeure, default, assignment, indemnity and insurance. The site license included as an attachment to Exhibit C is an authorization for the solar developer to access the ECWRF property as necessary for installation, operation, and maintenance of the floating solar array and associated equipment. A preliminary site map, included as Exhibit A, will be updated upon issuance of permits.

Each of the remaining documents provides additional supporting information to the main contract, including description of the premises and system, insurance requirements, site-specific requirements including mosquito abatement, financial agreements, design process and installation

requirements, scope requirements, technical specifications, and commissioning and performance testing requirements. The major details are summarized below.

Power Purchase Rate

The energy rates in the PPA increase over the 20-year term at a rate of 1.9% per year. Staff also analyzed a 0% escalator, similar to the Forefront PPA, and determined that an escalating PPA rate provides greater initial savings and provides more stable savings over the term of the PPA (see financial discussion section for additional information).

Term Year	PPA Rate (\$/kWh)	Estimated	Estimated Annual
		Production (kWh)	Savings
1	0.0962	9,074,592	\$508,000
2	0.0980	9,029,219	\$521,000
3	0.0999	8,984,073	\$535,000
4	0.1018	8,939,153	\$549,000
5	0.1037	8,894,457	\$563,000
6	0.1057	8,849,985	\$580,000
7	0.1077	8,805,735	\$595,000
8	0.1097	8,761,706	\$610,000
9	0.1118	8,717,897	\$626,000
10	0.1140	8,674,308	\$642,000
11	0.1161	8,630,936	\$658,000
12	0.1183	8,587,782	\$675,000
13	0.1206	8,587,782	\$692,000
14	0.1229	8,502,119	\$709,000
15	0.1252	8,459,608	\$727,000
16	0.1276	8,417,310	\$745,000
17	0.1300	8,375,223	\$763,000
18	0.1325	8,333,347	\$782,000
19	0.1350	8,291,681	\$801,000
20	0.1376	8,250,222	\$821,000

Project Schedule:

If the agreement is approved by Council at the December 19, 2022, Council meeting, White Pine will take the necessary steps to deliver the project with an estimated commercial operation date of December 31, 2024.

Termination:

The City has the option to terminate the agreement without cause at any time during the operation of the system, but would be required to make significant payments to White Pine. Staff cannot predict conditions that would lead to recommending termination of the energy service agreement with White Pine nor would staff recommend this agreement for approval if potential issues were

known, but in the event that termination becomes necessary, there would be financial impacts for the City to compensate the solar developer for expected earnings from the project. The agreement also includes provisions for termination by the City for cause, and in such case the City would not be obligated to pay the early termination fee.

After the initial term of 20 years, the City would have no termination costs, and the City may choose to have White Pine remove the equipment at their cost. Exhibit C, Section 2.1 (a) describes the early termination fees over the course of the agreement, which range from \$4,046,500 immediately after execution of this agreement, to \$14,898,472 after receipt of building and electrical permits and before the first anniversary of the commercial operation date (maximum capital outlay by White Pine), and down to \$1,429,386 during year 20 of the initial term.

Purchase Option:

The City also has the option to purchase the solar energy system from White Pine six years or more after the Commercial Operation Date of the system. The City might choose this option if it believed that the City or another operator could more efficiently operate the system. If the City purchases the system, White Pine would not be required to remove the equipment, nor would White Pine continue to perform maintenance or warranty work on the equipment. Staff does not anticipate exercising this option but provides the information for transparency and to illustrate the flexibility the agreement contains. The amounts for the purchase option are the greater of the amounts listed in Exhibit C, Section 3 (a) i, ranging from \$8,586,610 on the sixth anniversary of the commercial operation date to \$1,071,908 last year of the initial term, and fair market value.

Mosquito Abatement:

One of the discussion points within the interview process with solar developers was how to modify the design of the floating system to prevent formation of additional mosquito larvae habitat. The oxidation ponds historically have lower mosquito populations than the constructed wetlands at ECRWF. However, the floating solar project will change the pond environment and has the potential to exacerbate mosquito issues. The Marin Sonoma Mosquito Vector Control District (MSMVCD) regularly visits ECWRF to evaluate the mosquito population and determine the correct control mechanisms to eliminate or reduce larvae. Large open water areas such as the oxidation ponds are not a typical mosquito breeding habitat. The solar array float structure, however, provides multiple small, sheltered areas throughout the array, and provides challenges for MSMVCD staff to access the pond for monitoring and treatment activities.

MSMVCD, White Pine, and staff have met frequently to discuss these issues. White Pine is working with the float structure manufacturer to develop potential design modifications to reduce open water areas and enable MSMVCD staff to more easily and efficiently conduct their work. Staff have also discussed these issues with the Town of Windsor and the City of Healdsburg, who have recently installed floating solar arrays, to identify design and operating strategies that have been successful in keeping the mosquito population low or non-existent. The ESA requires White Pine to pay up to \$10,000 per year of mosquito abatement costs for Pond #3 related to the addition of the floating solar array.

Site Plan and Architectural Review:

On Monday, December 12, 2022, an Administrative Site Plan and Architectural Review (SPAR) was approved for installation of a floating solar array on Pond No. 3 and associated electrical equipment (file no. PLSR-2022-0040). Currently, solar projects on public facilities are not exempt from SPAR review under the City's Implementing Zoning Ordinance. Ancillary electrical equipment associated with the floating solar array, including inverters, a low-voltage switchboard, a step-up transformer, and other system components, would be located adjacent to the northeastern corner of the pond on a structure elevated between two and three feet above grade and setback approximately 820 feet from the public frontage along Lakeville Highway. The maximum height of the equipment would be approximately 7.5-feet-tall above grade. The SPAR approval conditions the project to apply earth-tone paint to the electrical equipment and consider the use of sight-obscuring screening, to the extent practicable. The final determination memo is Attachment 4.

Energy Storage:

In developing the floating solar project at ECWRF, staff and its consultant considered the feasibility and value of installing battery storage to use in conjunction with the solar energy system. At this time, the high initial cost of a battery backup system would not be offset by savings in power costs or downtime avoidance. Current backup power supply for ECWRF is provided by a diesel generator, which is used approximately 20 hours per year. Staff is currently in the process of procuring an ongoing source of renewable diesel (distinguished from biodiesel), which reduces the greenhouse gas emissions intensity of the fuel by at least 50%, and will implement that fuel switch for the existing generator when the procurement process has concluded. Additionally, staff will continue to monitor the costs and funding opportunities to make battery storage systems feasible.

Analysis of Comparable Solar Installations:

As part of staff's due diligence, staff researched other floating solar installations within Sonoma County.

- The City of Healdsburg has a 4.7MW-DC floating solar system on their holding pond. The 7.6-acre array was installed in 2021 and the initial contract is for 25 years. No energy storage systems are included in this agreement.
- The Town of Windsor installed in 2019 a 1.7MW-DC floating solar array on pond 7 which covers approximately 21% of the surface. This project has a PPA rate of \$0.105/kWh, a 2% escalation rate, and 25-year term. Energy storage systems are not included in this project.

Pacific Gas and Electric Interconnection Agreement and System Impact Study:

To accomplish the floating solar project, the City must execute an Interconnection Agreement (IA) with PG&E and ensure payment of PG&E's cost for interconnection and distribution system upgrade. Staff have been tracking closely the modification of PG&E's Net Energy Metering rules. PG&E has proposed to the California Public Utilities Commission to modify the net energy

metering rules and kWh unit value. This change substantially reduces the financial value of the solar kilowatts shared to the utility grid. To ensure the more favorable NEM 2.0 staff worked with NV5 to file the Interconnect Application with PG&E. PG&E has completed the System Impact Study and determined the required distribution system upgrades and estimated costs at \$173,600. To meet PG&E deadlines, the City has placed funds from the Wastewater Fund into an escrow account and will sign the IA after Council approval. After execution of the Energy Services Agreement, the solar developer will reimburse the City for these costs, replace the City's escrow account and assume future responsibility for payments to PG&E. The IA costs will be financed through the City's energy services payments under the PPA.

Ellis Creek Switchgear Assessment

The ECWRF main switchgear and electrical components were evaluated to determine if they could accommodate the additional electrical load from the addition of a 5.8 MW-DC / 4MW-AC solar system. Staff worked with NV5 to assess the current condition of the main switchgear and electrical components and determined that the system is sufficient to incorporate the additional load from the solar system. The solar array will be connected via underground conduit from the pond area to the main electrical switchgear.

Retention of Renewable Energy Credits (RECs)

City retains ownership of the RECs associated with this project and has full authority to hold, sell, or retire, in the City's sole discretion. The value of these RECs is currently estimated at \$9.50/MWh starting in 2024 and reducing to \$6.50/MWh in 2027.

City Manager Delegated Authority to Fully Execute PPA:

There are items required for the successful implementation of this project, such as the Site License, that cannot be executed at this time, as relevant details will not be known until the project is fully designed. As such, the Resolution delegates authority to the City Manager to fully execute all the necessary documents related to this project, provided they are substantially in the form presented at this meeting, subject to such changes, insertions or omissions as the City Manager reasonably deems necessary following the Council's adoption of the Resolution.

PUBLIC OUTREACH

This item was placed on the Tentative Agenda approved at the December 5, 2022, City Council meeting giving notice that a public hearing related to the California Government Code Section 4217 and consideration of this ESA would take place at the December 19, 2022, City Council meeting. The tentative agenda provided the advance notice of the public hearing on the PPA as required by Government Code Section 4217.12.

The weekly Community Update for December 15, 2022, included an announcement about the floating solar project and the upcoming presentation to Council.

Staff announced this item's consideration during the Climate Action Commission's December 8, 2022, meeting.

COUNCIL GOAL ALIGNMENT

The proposed action meets the following Council Goals:

#42: Find way for City Operations to reduce greenhouse gas emissions... and minimize use of fossil fuels...

#49: Install solar panels on city-owned facilities where appropriate...

#166: Make the City's Wastewater collection system more resilient, by repairing and replacing damaged sewer mains, and implementing the sewer masterplan

CLIMATE ACTION/SUSTAINABILITY EFFORTS

In May 2019 the City adopted the Climate Emergency Resolution which commits City operations to achieving greenhouse gas carbon neutrality by 2030. Though the electricity produced by Sonoma Clean Power Evergreen is 100% carbon-free, production of renewable energy at the source of energy demand (distributed generation) reduces transmission and distribution energy losses which results in reduced greenhouse gas emissions. The overall net environmental impact of installing renewable solar energy on this facility for the next twenty years is positive.

Installation and operation of 5.8MW-DC / 4MW-AC of renewable solar energy is expected to result in 9,074,592 kWh of energy in the first year.

ENVIRONMENTAL REVIEW

The power purchase agreement is a discretionary action and as such is subject to the California Environmental Quality Act (CEQA). The agreement would facilitate the installation of a photovoltaic system at an existing city facility for which an Environmental Impact Report was previously certified (State Clearinghouse #2001052089). An addendum to the certified EIR has been prepared in accordance with CEQA Guidelines Section 15164.

Environmental Impact Report

The EIR for the ECWRF (Water Recycling Facility and River Access Improvements EIR – State Clearinghouse #2001052089) included construction of new facilities, including secondary treatment and ammonia reduction upstream of the ponds and maintenance to the existing oxidation ponds. The proposed new floating solar array is within the footprint of the approved Project as analyzed in the 2002 Certified EIR. However, the approved Project did not consider inclusion of a floating solar array on top of an oxidation pond. This minor change to the approved Project is evaluated in the Floating Solar Array EIR Addendum (Attachment 5). The original EIR was certified by the City of Petaluma in 2002 and subsequently amended by certified addenda in 2004, 2005, 2006, 2007, twice in 2016, and in 2022.

The Addendum amends the original Water Recycling Facility and River Access Improvements EIR. Seven prior Addenda to the 2002 Certified EIR have previously been adopted. The first four EIR Addenda evaluated changes in design before the ECWR Facility was completed. The fifth EIR Addendum evaluated the addition of Biofuel to Biomass infrastructure to the ECWR Facility, the sixth EIR Addendum analyzed the relocation of a previously proposed bridge that had never

been constructed, and the seventh EIR Addendum analyzed the relocation and construction of a new outfall pipeline and outfall structure to replace the existing outfall structure.

This EIR Addendum concludes that installation of a floating solar array on Pond No. 3 does not result in new significant impacts and does not cause substantially more severe significant impacts relative to the impacts previously disclosed in the 2002 Certified EIR. Thus, an Addendum to the 2002 Certified EIR is appropriate, pursuant to CEQA Guidelines Sections 15162 and 15164. While certification of the addendum is not required, each prior addendum has been certified by the City Council. Furthermore, the Mitigation Monitoring Program (Attachment 6) does need to be adopted as part of the Floating Solar Project.

Permitting

The project is located within areas that require great care in protecting the environment and habitat. The project has been designed to minimize the work within the wetlands and waterways. A Mitigation Monitoring Plan has been developed to ensure that the project is constructed in compliance with best practices. No other regulatory agency permits and approvals would be required for the Floating Solar Array Project. The project has been designed to avoid impacts to wetlands and waters of the U.S. and State; therefore, a Clean Water Act Section 404 permit, California Fish and Game Code Section 1602 Lake and Streambed Alteration Agreement, and Clean Water Act Section 401 permit are not required.

Staff is recommending the Floating Solar EIR Addendum be certified and the Mitigation Monitoring Plan be adopted, the project approved, and award of a contract authorized at this time so that construction may begin immediately upon finalization of permits.

FINANCIAL IMPACTS

Since this agreement is a PPA, other than staff time, the only capital outlay costs (consultant and interconnection s) for the projects will be reimbursed by White Pine during the implementation phase. After paying all project costs, the project still generates substantial annual savings for the City for the 20-year term.

Staff recommends executing the PPA with White Pine for the initial kwh rate of \$0.0962 with the 1.9% rate escalator to allow for more even savings for the term of the agreement. Staff, with assistance from NV5, calculated and discussed the financial benefits of a 0% yearly escalator as compared to the recommendation. The 1.9% rate escalator offers flatter and slowly increasing savings over the 20-year term. The 0% rate escalator provides a fixed kWh rate over the life of the contract, with less savings in the early years and a more dramatic rise over the 20-year term. Year 1 cost reductions to the Wastewater Enterprise Funds for utility bill savings is estimated at \$508,000. The PPA cost per kWh will escalate at a rate of 1.9% annually over the course of the 20-year agreement, and utility rates historically rise approximately 3% per year. The resulting avoided cost is estimated to be \$13.1 million over the 20-year term.

The City's due diligence (development, environmental analysis, consultant support and PG&E system impacts) will initially be funded by Wastewater Enterprise funds. The consultant, and

utility expenditures are expected to cost approximately \$475,000, and these outlays will be reimbursed by the developer who will in turn be reimbursed through the City's energy services payments under the PPA.

ALTERNATIVES

If the Council does not authorize the award of the contract, the developer will not proceed with system design and it is unlikely that construction could be initiated within 2023. The project, and resulting energy savings, would be delayed. The PGE Interconnection Agreement will expire in February 2023 and the more favorable NEM 2.0 kWh credits may be lost.

Alternatively, the Council may direct staff to identify a funding source and contract with a design firm specializing in floating solar to develop design documents and equipment specifications suitable for public advertisement for construction bids. At construction completion the City would be the owner and operator of the floating solar system, requiring a contract with a maintenance and operations firm to assist with the periodic maintenance and any issue resolution.

ATTACHMENTS

- 1. Resolution
- 2. Energy Services Agreement with additional supporting exhibits and attachments
- 3. ECWRF Floating Solar Financial Analysis Memo from NV5
- 4. SPAR Determination Memo dated December 12, 2022
- 5. Addendum No. 8 to the 2002 Water Recycling Facility and River Access Improvements Environmental Impact Report for the floating solar array project
- 6. Mitigation Monitoring Program for the Ellis Creek Water Recycling Facility Floating Solar Array Project