



September 10, 2021

Jean Thurston-Keller
BOEM California Intergovernmental
Renewable Energy Task Force Coordinator
BOEM, Office of Strategic Resources
760 Paseo Camarillo (Suite 102)
Camarillo, CA 93010

Dear Ms. Thurston-Keller:

**RE: Bureau of Ocean Energy Management Docket No. BOEM-2021-0044
Commercial Leasing for Wind Power Development on the Outer Continental Shelf
Offshore Morro Bay, California, East and West Extensions—Call for Information
and Nominations**

Arevia Power, LLC (Arevia) appreciates the opportunity to submit these qualifications as a prospective lessee and grantee to hold renewable energy leases and grants on the Outer Continental Shelf (OCS) under 30 CFR 585.106 and 585.107. The information provided below is consistent with the “Qualification Guidelines to Acquire and Hold Renewable Energy Leases and Grants and Alternate Use Grants on the U.S. Outer Continental Shelf,” prepared by BOEM and dated May 27, 2020. Any questions or requests for additional information can be addressed to Mark Boyadjian, Managing Partner, Arevia Power at mark@areviapower.com or (917) 653-8116.

LEGAL QUALIFICATION

Arevia Power, LLC is a person, as defined in 30 CFR 585.112, who is eligible to hold a lease or grant, as set forth in 30 CFR 585.106 and 107. Arevia Power, LLC is a limited liability company formed under the laws of the State of California. Arevia is authorized to hold leases or grants on the OCS under the company’s operating rules.

Arevia Power, LLC has not been excluded or disqualified from participating in transactions covered by the Federal nonprocurement debarment and suspension system (2 CFR part 1400); has never failed to meet or exercise due diligence under any OCS lease or grant; and has never violated any of the terms and conditions of any lease or grant issued under the OCS Lands Act. No legal or regulatory actions have been taken against the company or its principals in the last five years.

Refer to Appendix A for supporting documents of legal qualification.

TECHNICAL AND FINANCIAL CAPABILITY

Arevia was established in 2017 by a team of developers having a combined 25 years of experience with permitting, interconnection, environmental review, financing, power marketing, and construction of renewable energy facilities in the Western U.S., Hawaii, and Puerto Rico.

Key Staff

Mark Boyadjian – Since starting Arevia Power, Mr. Boyadjian has led the company’s power marketing and fundraising efforts. This included power purchase agreement (PPA) negotiations and



contracting for 845MW. Over the last 12 years, Mr. Boyadjian has financed nearly 950 MW and acquired over 150 MW of solar projects. In addition to fundraising, Mark has deep experience in tax credit and PPA structuring. Before coming to the solar industry, Mark held positions in Real Estate Private Equity. He holds a B.S. in Finance from New York University Stern and an M.B.A. from University of Pennsylvania – The Wharton School.

Ricardo Graf – Since co-founding Arevia, Mr. Graf has led Arevia’s project development efforts including permitting, interconnection, regulatory affairs and construction. Mr. Graf was responsible for greenfielding and completing the development of the Gemini 690 MW Solar plus 380 MW Battery Storage project. Mr. Graf manages overall project portfolio execution and is seasoned in all facets of utility-scale solar PV plus battery development and manages wind project development for Arevia. Over the past 13 years, he created over 2.5GW of project pipeline/backlog in the Western U.S., Hawaii, Puerto Rico. Before coming to the solar industry, Ricardo held roles in residential real estate development. He holds a B.S. in Public Relations from Pacific Union College and an M.B.A. from La Sierra University.

Tim Derrick – Mr. Derrick has worked in renewable energy development for 20 years. He began his energy career in 2001 in the wind industry at Enron Wind and GE Wind Energy. He was co-founder and CEO of one of the first North American utility-scale solar developers, Axio Power, from 2007-2011. Axio Power assembled a pipeline of over 1 GW of solar projects in the U.S. and Canada and was acquired by SunEdison in 2011. At SunEdison, Tim became the President and General Manager of North American Project Development, including solar, wind, and energy storage which developed, financed, constructed, and operated over 1.5 GW of projects. He also led the sale of \$500 million of solar assets in 2016. Tim later was co-founder and CEO of Lightsource North America, a subsidiary of U.K.-based Lightsource, which was acquired by BP forming Lightsource BP in 2018. Tim holds a B.A. from Dartmouth College, an M.B.A. in from the University of Michigan, and served as a U.S. Army officer for eight years.

Rafik Albert – Mr. Albert, Vice President of Planning at EPD Solutions, Inc., has provided due diligence, entitlement, and project management services for over 2 GW of renewable energy facilities throughout the western U.S., ranging from small community generation sites to utility-scale facilities covering thousands of acres. His 15 years of expertise as a consultant has required coordination with a wide range of local and state governments, and stakeholders including tribes, environmental organizations, and community groups. He holds a B.S. in City and Regional Planning from California Polytechnic State University, San Luis Obispo and an M.B.A. from California State University, Long Beach.

Tania Treis – Ms. Treis, Principal at Panorama Environmental, Inc., brings the project team broad knowledge of the National Environmental Policy Act (NEPA) and other regulatory processes. Ms. Treis has managed the preparation of hundreds of environmental studies over the last 20 years, including permitting due diligence, environmental programs, plans of development and operation, Environmental Assessments (EAs), and Environmental Impact Statements (EISs). Within Panorama, she has built and managed extensive project teams composed of in-house and subcontracted technical specialists. She has worked on the preparation of all sections of NEPA documents and has performed quality control and technical editing of client deliverables. She also



has managed the permitting process and led public outreach programs on contentious projects, including Arevia's 690-MW Gemini Solar project.

Ms. Treis's program and project management experience includes establishing team collaboration environments across multiple companies; managing task orders, schedules, budgets, and administrative records; and serving as the liaison between project applicants, technical teams, and jurisdictional agencies. She holds a B.A. in Mathematical Biology and an M.A. in Biology from the University of Pennsylvania and an M.S. in Geology from San Jose State University.

Linda Bullen – Ms. Bullen is an attorney specializing in environmental law, renewable energy, NEPA, and the Endangered Species Act. She has extensive expertise supporting the siting and construction of utility scale solar, wind, geothermal, and transmission projects throughout the western U.S. Earlier in her career, Ms. Bullen served as Assistant Regional Counsel, Region V, Chicago for the U.S. Environmental Protection Agency and as an Assistant Attorney General in Minnesota. Ms. Bullen is a Fellow and Program Chair at the American College of Environmental Lawyers. She holds a B.A. from the University of Wisconsin – La Crosse and a J.D. from the University of Wisconsin Law School.

Chris Brooks – Chris has more than 25 years of experience in the contracting, renewable energy, and utility industries. Chris is one of the first IBEW signatory renewable energy companies in the country, led one of the largest IBEW solar EPC contractors in the country, and eventually became the Executive Vice President of Valley Electric Association (VEA). Chris has been an IBEW member for over 20 years, started the solar training program at the NJATC of Southern Nevada where he was an instructor, and was on the NJATC Curriculum Development Committee helping to create renewable energy and storage training materials. Chris Brooks currently works as a consultant for energy developers, contractors, and utilities, and has worked with Arevia Power since 2017 on several large renewable energy and storage project across the Western United States.

Project Experience

Arevia was the developer of one of the largest solar and battery projects in the U.S., Gemini Solar in Clark County, Nevada, a short distance from Las Vegas. The 690 MWac solar/380 MWac battery project was processed through the federal Bureau of Land Management (BLM) with an environmental impact statement. A Record of Decision was issued in May 2020 and a Right of Way Grant was subsequently provided, with construction commencing in 2021. Through the project SPV, Arevia invested in Gemini Solar, with exhaustive assessments of the site (emphasizing biological and cultural resources issues) and extensive outreach with local, State, tribal, and federal entities in order to obtain the collaborative support needed for the project to succeed. Arevia also managed PPA and interconnection negotiations, ultimately resulting in agreements to provide power to NV Energy, the major electric utility in Nevada.

Arevia is currently developing the following projects:

- Libra Solar, 700 MW solar/700 MW battery in Nevada. This project is in review with BLM and interconnection studies will be initiated in 2021.
- Gold Dust Solar, 1,500 MW solar/1,000 MW battery in Nevada. This project is in review with BLM and interconnection studies will be initiated in 2021.



- Stagecoach Wind, 600 MW wind/200 MW battery in Nevada. BLM has accepted an application for wind testing at this site, which is expected to be initiated in 2022.
- Virgo Solar, 400 MW solar/400 MW battery in Nevada. An application has been filed with BLM for review of this project to begin.
- Solar 373, 400 MW solar/400 MW battery in Nevada. An application has been filed with BLM for review of this project to begin.

Subconsultants

Arevia makes effective use of consultants for specialized services to ensure the success of projects. This includes:

- NEPA consultants;
- Biological resources, cultural resources, visual resources, air quality, and other technical consultants;
- Power system modeling, interconnection support; and
- Entitlement and outreach support.

Our proposed team for activities with BOEM includes the following highly experienced firms:



Panorama Environmental, Inc. (Panorama), established in 2011, provides environmental planning, analysis, and regulatory permitting services to public- and private-sector clients. Panorama prepares environmental reports required by NEPA and applicable state-level environmental legislation, as well as environmental and social impact assessments required by international organizations such as the World Bank. Panorama prepares the following NEPA environmental compliance documents:

- Preliminary Environmental Assessments (PEAs)
- Environmental Assessments (EAs)
- Findings of No Significant Impact (FONSI)
- Environmental Impact Statements (EIS)

Panorama is especially adept at preparing joint federal/state environmental documents with multiple-agency jurisdictions.

Among the projects completed by Panorama are:

- Gemini Solar EIS (Arevia Power), 690 MW in Nevada;
- Santa Isabel Wind Farm EIS (Pattern Energy), 101 MW in Puerto Rico;
- Sycamore-Peñasquitos 230-kV Transmission Line Environmental Impact Report (EIR) (California Public Utilities Commission), 16.7-mile line in California; and
- Soda Mountain Solar EIS/EIR (Caithness, Bechtel Enterprises), 350 MW in California.

E | P | D
SOLUTIONS, INC

EPD Solutions, Inc. (EPD), established in 2013, manages complex projects by combining due diligence, technical studies, entitlement coordination, regulatory permitting, and construction permitting services in a single team. The company also offers environmental services for California Environmental Quality Act compliance.

Among the projects completed by EPD are:

- Gemini Solar EIS (Arevia Power), 690 MW in Nevada;
- Hemet Solar (SunEdison), 20 MW in California;
- Due diligence for over 3 GW of solar fields in Arizona, California, Colorado, Idaho, Massachusetts, Nevada, North Carolina, Texas, and Utah.
- Downtown Commercial Core Specific Plan (City of Tustin, California), 887 residential units and 300,000 square feet of commercial space.

BULLEN LAW, LLC Bullen Law specializes in environmental law, renewable energy, NEPA compliance, and the Endangered Species Act. Led by Linda Bullen, Bullen Law is a leading advisor on complex environmental matters such as hazardous waste, water, air, renewable energy, federal land use, permitting, and NEPA issues. Bullen Law has worked with developers siting and constructing utility scale solar, wind, geothermal and transmission projects throughout the western United States.

Preliminary Assessment of Permitting Requirements

Numerous authorizations, including state and federal permits, will need to be obtained in addition to site characterizations per 30 CFR part 585, Subpart F, Renewable Energy and Alternative Uses of Existing and Facilities on the Outer Continental Shelf.

The following list summarizes federal approvals that could be needed to address offshore and onshore facilities.

- **Bureau of Ocean Energy Management**
 - Site Assessment Plan approval
 - Construction and Operations Plan (COP) approval
 - National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS)
 - Consultation under Section 7 of the Endangered Species Act with National Marine Fisheries Service and US Fish and Wildlife Service, coordination with states under the Coastal Zone Management Act, government-to-government tribal consultation, consultation under Section 106 of the National Historic Preservation Act, and consultation with National Marine Fisheries Service for Essential Fish Habitat (EFH).
- **US Environmental Protection Agency**
 - National Pollutant Discharge Elimination System (NDPES) General Permit for Construction Activities
 - Outer Continental Shelf Air Permit

- **US Army Corps of Engineers**
 - Individual Clean Water Act Section 404 (Required for side-casting of dredged material and placement of foundations, scour protection, and cable protection)
 - Rivers and Harbors Act of 1899 Section 10 Permit (Required for all offshore structures and dredging activities)
- **US National Marine Fisheries Service**
 - Marine Mammal Protection Act (MMPA) Authorization/ Incidental Harassment Authorization (IHA)/Letter of Authorization (LOA)
- **US Coast Guard**
 - Private Aids to Navigation authorization
- **Federal Aviation Administration**
 - No Hazard Determination

State permits will be needed for the transmission cable for the project in federal waters as well as for onshore facilities in California. California permits could include:

- **California State Lands Commission**
 - Application for Use of State Lands
 - Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA)
- **California Coastal Commission (CCC)**
 - Coastal Zone Consistency Certification Coastal Development Permit for any specific project by a private developer
- **Central Coast Regional Water Quality Control Board (RWQCB)**
 - Section 401 of the Clean Water Act Water Quality Certification
 - Clean Water Act National Pollutant Discharge Elimination System Permit
- **California Department of Fish and Wildlife**
 - Scientific Collection Permit
 - California Endangered Species Act Incidental Take Permits
 - Section 1600 Streambed Alteration Agreement
- **San Luis Obispo County Air Pollution Control District**
 - Dust Control Plan
- **California Public Utilities Commission**
 - Permit to Construct (possibly needed by Investor Owned Utilities)

Local permits could include:

- **County of San Luis Obispo**
 - Local Coastal Program - Central Coast District
 - Coastal Development Permit
 - Ministerial approvals, such as building, grading, electrical, sewer, waste, and/or encroachment permits.

Studies will also be required per the Site Assessment Plan, which addresses geologic setting, coastal habitats, water quality, benthic resources, fisheries and Essential Fish Habitat, Marine Mammals and sea turtles, coastal and marine birds and bats, archeological resources, social and economic resources, coastal and marine uses, and air quality impacts. Additional support studies could include:

- Equipment Specifications and Modelling Results
- Visual Impact Assessment
- A Site Characterization Report
- A Marine Archaeological Resource Assessment Report
- A Benthic Assessment
- Essential Fish Habitat Assessment
- A Health and Safety Plan

Geophysical studies may be needed that could include:

- Multibeam echosounder bathymetry– to determine water depths and topographic features on the seabed and initial review of surficial sediment;
- Sidescan sonar imagery – acoustic seabed imagery used to map surficial sediment distributions and bedforms, as well as detect possible natural and anthropogenic hazards on the seabed such as boulders, debris, and shipwrecks;
- Sub-bottom profiler – a subsurface investigation using a pinger shallow-penetration sub-bottom profiler to investigate shallow (up to 66 ft./20 m) sediment stratigraphy;
- Magnetometer – fluctuations in the magnetic field were measured to detect ferrous items on the seabed that could be potential hazards or cultural deposits, included debris and shipwrecks;
- Sediment grab samples – to ground-truth interpretation of the geophysical data; and
- Underwater video imagery – collected using a remotely operated camera to identify natural and human-caused obstructions, as well as aid in benthic habitat assessment.

Financial Capability

Arevia currently estimates it will need \$20 million in development capital to fund the initial investment in a Site Assessment Plan (SAP). This will include environmental collection studies for protected species, fisheries, and marine sanctuaries. It will also include geotechnical investigations, geophysical surveys, and archaeological surveys such as bathymetry, geomorphology, sediment



transport, and meteorology. It will also include hazard surveys for cables, pipelines, hydrocarbon and navigational aids.

Arevia intends to fund these initial costs directly through equity, including all direct and indirect project costs and any potential deposits that may arise. Arevia is currently in commercial negotiations with a number of union pension funds, such as the IBEW, private equity funds, and infrastructure funds to invest in the entirety of development and construction.

For subsequent phases of project development, Arevia will use the following means of financing:

Construction Period Financing

At Financial Notice to Proceed, Arevia will use a construction loan covering approximately 80% of the total construction cost, with Arevia and its partners will fund the remaining 20% as equity. The permanent debt and tax equity commitments, which will be in place at the outset of construction, provide the source of repayment to the construction lender.

Operating Period Financing

For the operating period of the project, Arevia will use a combination of sponsor equity, tax equity investment and permanent debt. Both the permanent debt and tax equity providers sign firm commitments before construction begins to fund the project at the COD. Permanent debt is typically ~40% of the capital structure and is sized against net operating income from the project. Tax equity typically funds ~40% of the capital structure. The sponsor equity, also known as Developer's Equity will be ~20% of the capital structure.

The senior management of Arevia has successfully financed over 2 GW of renewable projects requiring, sponsor equity, tax equity financings and debt in the United States. The combined team has executed tax equity financings with Deutsche Bank, Morgan Stanley, GE Energy Financial Services, Citigroup, and US Bank.

Company Profile:

- Name, location, and description of your business entity;
 - **Arevia Power LLC, California, renewables developer, including Wind Power, Solar Photovoltaics and Battery Energy Storage Systems .**
- A description of your corporate structure (parent company(s), subsidiary(s), publicly disclosed investor(s), and the relationships between these parties, as applicable). BOEM considers a chart or other illustration depicting this information to be an acceptable format for submitting this documentation;
 - **Arevia Power LLC is the parent company to a number of 100% owned subsidiaries. Arevia Power LLC is a partnership owned and managed by both Managing Members**
- Bank references: **Arlen Shirvanian, VP Banc of California, 310-728-1139**
- Years in operation: **4 years, incorporated in February 2017**
- Current audited financial statement from an independent certified public accountant, preferably using accounting standards accepted by the Securities and Exchange Commission, if available. If not available, please include a statement to this effect;
 - **Please see attached**



- Information regarding any bankruptcy or other adverse financial proceedings within the last 5 years, if applicable. If not applicable, please include a statement to this effect;
 - **None**

Refer to Appendix B for supporting documents for technical and financial capability.



APPENDIX A – Legal Qualifications



September 1, 2021

Mr. Mark Boyadjian
Managing Partner
Arevia Power
500 N. Central Ave Suite 600
Glendale, CA 91203

Dear Mr. Boyadjian,

This letter is to affirm that Panorama Environmental, Inc. has an existing business relationship with Arevia Power providing environmental planning support services for various renewable energy projects. Our team brings years of expertise in the overall management of compliance with the National Environmental Policy Act (NEPA), various resource permitting and entitlement processes, and in leading and managing technical support studies for the initial engineering and permitting processes for renewable energy and other infrastructure projects. We have discussed and agreed that we can support Arevia Power in their development of offshore wind projects in the Morro Bay Call Area and Morro Bay 399 Area, including with the NEPA process, state environmental review processes, and overseeing technical teams to conduct the numerous studies that would be needed. We would support Arevia Power as a contractor under a detailed services agreement that clearly defines our roles, responsibilities, accomplishments, and fees, similar to past and other, on-going engagements.

Sincerely,

A handwritten signature in blue ink that reads 'Tania Treis'.

Tania Treis, President
Panorama Environmental, Inc.

ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

September 3, 2021

Mark Boyadjian
Managing Partner
Arevia Power
500 N. Central Ave., Suite 600
Glendale, CA 91203

Dear Mr. Boyadjian:

This letter affirms the existing business relationship between EPD Solutions, Inc. and Arevia Power in the provision of due diligence, permitting and entitlement support, and project management for various renewable energy projects.

Our team brings decades of expertise in due diligence for various project types, resource permitting and entitlement processes, management of consultants, and technical analyses related to air pollution, greenhouse gas emissions, energy use, and traffic. We have discussed and agreed that we can support Arevia Power in their development of offshore wind projects in the Morro Bay Call Area, Morro Bay 399 Area, and other areas offshore California, including with project management, Bureau of Ocean Energy Management coordination, and preparation and management of technical analyses. We would support Arevia Power as a contractor under a detailed services agreement that clearly defines our roles, responsibilities, accomplishments, and fees, similar to past and other, on-going engagements.

Please contact me at (949) 794-1182 or rafik@epdsolutions.com with any questions.

Respectfully submitted,
EPD Solutions, Inc.

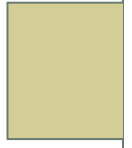


Rafik Albert, AICP
Vice President of Planning

BULLEN LAW, LLC

8635 W. SAHARA AVE. #454 LAS VEGAS NV 89117 702.279.4040

LINDA@BULLENLAW.COM



September 3, 2021

Mr. Mark Boyadjian
Managing Partner
Arevia Power
500 N. Central Ave Suite 600
Glendale, CA 91203

Dear Mr. Boyadjian,

This letter is to affirm that Bullen Law, LLC (the “Firm” or “Bullen Law”) has an existing business relationship with Arevia Power providing legal services for a number of solar and wind renewable energy projects. Bullen Law brings over thirty years of years of environmental law expertise and over fifteen years of experience in permitting and entitlement associated with renewable energy and other infrastructure projects.

Bullen Law and Arevia have discussed and agreed that the Firm can support Arevia Power in its development of offshore wind projects. Bullen Law would support Arevia Power in conformance with a legal engagement letter that clearly defines Bullen Law and Arevia’s roles, responsibilities and fees, as the two companies have engaged in in previous and ongoing matters.

Best Regards,

/s/ Linda M. Bullen

Linda M. Bullen

Founder

Bullen Law, LLC