C.14 – WASTE MANAGEMENT

Testimony of Ellen Townsend-Hough

C.14.1 SUMMARY OF CONCLUSIONS

Management of the waste generated during construction and operation of the Calico Solar Project (formerly the Stirling Energy Systems Solar One Project) would not generate a significant impact under the California Environmental Quality Act (CEQA) guidelines or National Environmental Protection Act (NEPA). There is sufficient landfill capacity, and the project would be consistent with the applicable waste management laws, ordinances, regulations, and standards if the measures proposed in the Application for Certification and staff's proposed conditions of certification are implemented. Similar to the proposed project, staff considers project compliance with California Environmental Quality Act guidelines (Appendix G: Environmental Checklist Section XVI-Utilities and Service Systems); applicable waste management laws, ordinances, regulations, and standards; and staff's conditions of certification to be sufficient to ensure that no significant impacts would occur as a result of waste management associated with the Reduced Acreage Alternative, and the No Project/No Action Alternative. Southern California Edison's transmission upgrades would comply with all applicable laws, ordinances, regulations, and standards regulating the management of hazardous and non-hazardous and non-hazardous waste during both construction and operation. Implementing mitigation measures similar to the Conditions of Certification that are proposed in the Calico Solar Project Staff Assessment for construction and operation would avoid impacts to construction workers and the environment if applied to the Southern California Edison transmission upgrade options.

C.14.2 INTRODUCTION

This section presents an analysis of issues associated with wastes generated from the proposed construction and operation of the Calico Solar Project. The technical scope of this analysis encompasses solid and liquid wastes existing on site and wastes that would likely be generated during facility construction and operation. Management and discharge of wastewater is addressed in the **SOIL AND WATER RESOURCES** section of this document. Additional information related to waste management may also be covered in the **WORKER SAFETY** and **HAZARDOUS MATERIALS MANAGEMENT** sections of this document.

The Energy Commission staff's objectives in conducting this waste management analysis are to ensure that:

- the management of project wastes would be in compliance with all applicable laws, ordinances, regulations, and standards (LORS). Compliance with LORS ensures that wastes generated during the construction and operation of the proposed project would be managed in an environmentally safe manner.
- the disposal of project wastes would not result in significant adverse impacts to existing waste disposal facilities.
- upon project completion, the site is managed in such a way that project wastes and waste constituents would not pose a significant risk to humans or the environment.

C.14.3 METHODOLOGY AND THRESHOLDS FOR DETERMINING ENVIRONMENTAL CONSEQUENCES

In accordance with California Environmental Quality Act (CEQA) guidelines (Appendix G: Environmental Checklist Section XVI – Utilities and Service Systems), staff evaluated project wastes in terms of landfill capacity and LORS compliance. The following federal, state, and local environmental laws, ordinances, regulations, and standards (LORS) have been established to ensure the safe and proper management of both solid and hazardous wastes in order to protect human health and the environment, and absent any unusual circumstances, compliance would be sufficient to ensure that no significant impacts would occur as a result of project waste management.

Waste Management Table 1
Laws, Ordinances, Regulations, and Standards (LORS)

Applicable Law	Description
Federal	
Title 42, United States Code (U.S.C.), §6901, et seq. Solid Waste Disposal Act of 1965 (as amended and revised by the Resource Conservation and Recovery Act of 1976, et al.)	The Solid Waste Disposal Act, as amended and revised by the Resource Conservation and Recovery Act (RCRA) et al., establishes requirements for the management of solid wastes (including hazardous wastes), landfills, underground storage tanks, and certain medical wastes. The statute also addresses program administration, implementation and delegation to states, enforcement provisions, and responsibilities, as well as research, training, and grant funding provisions. RCRA Subtitle C establishes provisions for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing: • Generator record keeping practices that identify quantities of hazardous wastes generated and their disposition; • Waste labeling practices and use of appropriate containers; • Use of a manifest when transporting wastes; • Submission of periodic reports to the United States Environmental Protection Agency (U.S. EPA) or other authorized agency; and • Corrective action to remediate releases of hazardous waste and contamination associated with RCRA-regulated facilities. RCRA Subtitle D establishes provisions for the design and operation of solid waste landfills. RCRA is administered at the federal level by U.S. EPA and its 10 regional offices. The Pacific Southwest regional office (Region 9) implements U.S. EPA programs in California, Nevada, Arizona, and Hawaii.

Applicable Law	Description
Title 42, U.S.C., §9601, et seq. Comprehensive Environmental Response, Compensation and Liability Act	The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), also known as *Superfund*, establishes authority and funding mechanisms for cleanup of uncontrolled or abandoned hazardous waste sites, as well as cleanup of accidents, spills, or emergency releases of pollutants and contaminants into the environment. Among other things, the statute addresses: • Reporting requirements for releases of hazardous substances; • Requirements for remedial action at closed or abandoned hazardous waste sites, and brownfields; • Liability of persons responsible for releases of hazardous substances or waste; and • Requirements for property owners/potential buyers to conduct "all appropriate inquiries" into previous ownership and uses of the property to 1) determine if hazardous substances have been or may have been released at the site, and 2) establish that the owner/buyer did not cause or contribute to the release. A Phase I Environmental Site Assessment is commonly used to satisfy CERCLA "all appropriate inquiries" requirements.
Title 40, Code of Federal Regulations (CFR), Subchapter I – Solid Wastes	These regulations were established by U.S. EPA to implement the provisions of the Solid Waste Disposal Act and RCRA (described above). Among other things, the regulations establish the criteria for classification of solid waste disposal facilities (landfills), hazardous waste characteristic criteria and regulatory thresholds, hazardous waste generator requirements, and requirements for management of used oil and universal wastes. • Part 257 addresses the criteria for classification of solid waste disposal facilities and practices. • Part 258 addresses the criteria for municipal solid waste landfills. • Parts 260 through 279 address management of hazardous wastes, used oil, and universal wastes (i.e., batteries, mercury-containing equipment, and lamps). U.S. EPA implements the regulations at the federal level. However, California is an RCRA-authorized state, so most of the solid and hazardous waste regulations are implemented by state agencies and authorized local agencies in lieu of U.S. EPA.
Title 49, CFR, Parts 172 and 173. Hazardous Materials Regulations	These regulations address the United States Department of Transportation (DOT) established standards for transport of hazardous materials and hazardous wastes. The standards include requirements for labeling, packaging, and shipping of hazardous materials and hazardous wastes, as well as training requirements for personnel completing shipping papers and manifests. Section 172.205 specifically addresses use and preparation of hazardous waste manifests in accordance with Title 40, CFR, section 262.20.
Federal CWA, 33 USC § 1251 *et seq.*	The Clean Water Act controls discharge of wastewater to the surface waters of the U.S.

Applicable Law	Description
Title 40 CFR Section 112	This establishes procedures, methods, equipment, and other requirements to prevent the discharge of oil from non-transportation-related onshore and offshore facilities into or upon the navigable waters of the United States or adjoining shorelines, or into or upon the waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or the Deepwater Port Act of 1974. Subpart B - The Spill Prevention, Control and Countermeasures (SPCC) Plan includes procedures, methods, and equipment at the facility to prevent discharges of petroleum from reaching navigable waters.
State	
California Health and Safety Code (HSC), Chapter 6.5, §25100, et seq. Hazardous Waste Control Act of 1972, as amended	This California law creates the framework under which hazardous wastes must be managed in California. The law provides for the development of a state hazardous waste program that administers and implements the provisions of the federal RCRA program. It also provides for the designation of California-only hazardous wastes and development of standards (regulations) that are equal to or, in some cases, more stringent than federal requirements. The California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) administers and implements the provisions of the law at the state level. Certified Unified Program Agencies (CUPAs) implement some elements of the law at the local level.
Title 22, California Code of Regulations (CCR), Division 4.5. Environmental Health Standards for the Management of Hazardous Waste	These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal RCRA. As with the federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting the waste off site; and use only permitted treatment, storage, and disposal facilities. Generator standards also include requirements for record keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters. The standards addressed by Title 22, CCR include: • Identification and Listing of Hazardous Waste (Chapter 11, §66261.1, et seq.). • Standards Applicable to Generator of Hazardous Waste (Chapter 12, §66262.10, et seq.). • Standards Applicable to Transporters of Hazardous Waste (Chapter 13, §66263.10, et seq.). • Standards for Universal Waste Management (Chapter 23, §66273.1, et seq.). • Standards for the Management of Used Oil (Chapter 29, §66279.1, et seq.). • Requirements for Units and Facilities Deemed to Have a Permit by Rule (Chapter 45, §67450.1, et seq.). The Title 22 regulations are established and enforced at the state level by DTSC. Some generator and waste treatment standards are also enforced at the local level by CUPAs.

Applicable Law	Description
HSC, Chapter 6.11 §§25404 – 25404.9 Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program)	The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of the six environmental and emergency response programs listed below. • Aboveground Petroleum Storage Act requirements for Spill Prevention, Control, and Countermeasure (SPCC) Plans. • Hazardous Materials Release and Response Plans and Inventories (Business Plans). • California Accidental Release Prevention (CalARP) Program. • Hazardous Materials Management Plan / Hazardous Materials Inventory Statements. • Hazardous Waste Generator / Tiered Permitting Program. • Underground Storage Tank Program. The state agencies responsible for these programs set the standards for their programs while local governments implement the standards. The local agencies implementing the Unified Program are known as CUPAs. The DTSC's Calexico Field Office is the CUPA for the Calico Solar Project. Note: The Waste Management analysis only considers application of the Hazardous Waste Generator/Tiered Permitting element of the Unified Program.
Title 27, CCR, Division 1, Subdivision 4, Chapter 1, §15100, et seq. Unified Hazardous Waste and Hazardous Materials Management Regulatory Program	While these regulations primarily address certification and implementation of the program by the local CUPAs, the regulations do contain specific reporting requirements for businesses. • Article 9 – Unified Program Standardized Forms and Formats (§§ 15400–15410). • Article 10 – Business Reporting to CUPAs (§§15600–15620).
Public Resources Code, Division 30, §40000, et seq. California Integrated Waste Management Act of 1989	The California Integrated Waste Management Act (CIWMA) establishes mandates and standards for management of solid waste in California. The law addresses solid waste landfill diversion requirements; establishes the preferred waste management hierarchy (source reduction first, then recycling and reuse, and treatment and disposal last); sets standards for design and construction of municipal landfills; and addresses programs for county waste management plans and local implementation of solid waste requirements.

Applicable Law	Description
Title 14, CCR, Division 7, §17200, et seq. California Integrated Waste Management Board	These regulations implement the provisions of the California Integrated Waste Management Act and set forth minimum standards for solid waste handling and disposal. The regulations include standards for solid waste management, as well as enforcement and program administration provisions. • Chapter 3 – Minimum Standards for Solid Waste Handling and Disposal. • Chapter 3.5 – Standards for Handling and Disposal of Asbestos Containing Waste. • Chapter 7 – Special Waste Standards. • Chapter 8 – Used Oil Recycling Program. • Chapter 8.2 – Electronic Waste Recovery and Recycling.
HSC, Division 20, Chapter 6.5, Article 11.9, §25244.12, et seq. Hazardous Waste Source Reduction and Management Review Act of 1989	This law was enacted to expand the state's hazardous waste source reduction activities. Among other things, it establishes hazardous waste source reduction review, planning, and reporting requirements for businesses that routinely generate more than 12,000 kilograms (approximately 26,400 pounds) of hazardous waste in a designated reporting year. The review and planning elements are required to be done on a 4-year cycle, with a summary progress report due to DTSC every fourth year.
Title 22, CCR, §67100.1 et seq. Hazardous Waste Source Reduction and Management Review	These regulations further clarify and implement the provisions of the Hazardous Waste Source Reduction and Management Review Act of 1989 (noted above). The regulations establish the specific review elements and reporting requirements to be completed by generators subject to the act.
Title 23, CCR Division 3, Chapters 16 and 18	These regulations relate to hazardous material storage and petroleum UST cleanup, as well as hazardous waste generator permitting, handling, and storage. The DTSC San Bernardino County CUPA is responsible for local enforcement.
HSC, Chapter 6.67, §25270 Aboveground Petroleum Storage Act	Aboveground Petroleum Storage Act is part of the California HSC, gives local CUPAs authority over APSA. APSA incorporates by reference the Federal standards for preparing an SPCC plan. Specifically, APSA subject "tank facilities" must prepare an SPCC plan in accordance with the requirements of 40CFR112, conduct periodic tank inspections in accordance with the requirements of 40CFR112, and the Plan must be implemented in accordance with 40CFR112
Local	
County of San Bernardino General Plan	The General Plan ensures all new development complies with applicable provisions of the County Integrated Solid Waste Management Plan.
San Bernardino County, Countywide Integrated Waste Management Plan	This document sets forth the county's goals, policies, and programs for reducing dependence on landfilling solid wastes and increasing source reduction, recycling, and reuse of products and waste, in compliance with the CIWMA. The plan also addresses the siting and development of recycling and disposal facilities and programs within the county.

C.14.4 PROPOSED PROJECT

C.14.4.1 SETTING AND EXISTING CONDITIONS

Proposed Project

The proposed Calico Solar Project site is approximately 6,215 acres of Bureau of Land Management (BLM) land located in San Bernardino County, California (Tessera Solar 2010ah). The site is located on Hector Road north of Interstate 40, 17 miles east of Newberry Springs and 115 miles east of Los Angeles, California in the Mojave Desert (SES 2008f page 1-1). The project consists of 17 contiguous parcels (SES 2008f Appendix T). The Burlington Northern Santa Fe (BNSF) railroad bisects the site from west to east (SES 2008f 3-22).

The proposed project would utilize SunCatchers – 40-foot tall Stirling dish technology developed by the applicant – which track the sun and focus solar energy onto Power Conversion Units (PCU) (SES 2008f 3-2) to generate electricity. Each PCU consists of a solar receiver heat exchanger and a closed-cycle, high-efficiency Solar Stirling Engine specifically designed to convert solar power to rotary power via a thermal conversion process. The engine drives an electrical generator to produce grid-quality electricity.

Phase I would be limited to 275 MW, with the remaining 575 MW as part of Phase II. There will be one 10-acre laydown area, located within the Main Services Complex area. In addition, the project will also have within the main services complex a 15 acre construction laydown staging area (Tessera Solar 2010ag). In addition to the proposed Calico Solar Project site and construction areas, there are other features and facilities associated with the proposed project (the majority of which are located on the proposed project site or construction laydown area), including:

- Approximately 34,000 SunCatchers and associated equipment and infrastructure within a fenced boundary;
- An onsite, 52 acre Main Services Complex located in the northern portion of the Phase I section of the project site for administration and maintenance activities. The complex would include buildings, parking and access roads (Tessera Solar 2010ag); and
- An onsite, 2.8-acre 850-MW Calico Solar Project Substation located in the southern portion of the Phase I section of the site (SES 2008f page 3-62 and Figure3-4).

C.14.4.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

This waste management analysis addresses: a) existing project site conditions and the potential for contamination associated with prior activities on or near the project site, and b) the impacts from the generation and management of wastes during project construction and operation.

Existing Project Site Conditions and Potential for Contamination

For any site in California proposed for the construction of a power plant, the applicant must provide documentation about the nature of any potential or existing releases of

hazardous substances or contamination at the site. If potential or existing releases or contamination at the site are identified, the significance of the release or contamination would be determined by site-specific factors, including, but not limited to: the amount and concentration of contaminants or contamination; the proposed use of the area where the contaminants/contamination is found; and any potential pathways for workers, the public, or sensitive species or environmental areas to be exposed to the contaminants. Any unmitigated contamination or releases of hazardous substances that pose a risk to human health or environmental receptors would be considered significant by Energy Commission staff.

As a first step in documenting existing site conditions, the Energy Commission's power plant site certification regulations require that a Phase I Environmental Site Assessment (ESA) be prepared[1] and submitted as part of an AFC. The Phase I ESA is conducted to identify any conditions indicative of releases and threatened releases of hazardous substances at the site and to identify any areas known to be contaminated (or a source of contamination) on or near the site.

In general, the Phase I ESA uses a qualified environmental professional to conduct inquiries into past uses and ownership of the property, research hazardous substance releases and hazardous waste disposal at the site and within a certain distance of the site, and visually inspect the property, making observations about the potential for contamination and possible areas of concern. After conducting all necessary file reviews, interviews, and site observations, the environmental professional then provides findings about the environmental conditions at the site. In addition, since the Phase I ESA does not include sampling or testing, the environmental professional may also give an opinion about the potential need for any additional investigation. Additional investigation may be needed, for example, if there were significant gaps in the information available about the site, an ongoing release is suspected, or to confirm an existing environmental condition.

If additional investigation is needed to identify the extent of possible contamination, a Phase II ESA may be required. The Phase II ESA usually includes sampling and testing of potentially contaminated media to verify the level of contamination and the potential for remediation at the site.

In conducting its assessment of a proposed project, staff will review the project's Phase I ESA and work with the appropriate oversight agencies as necessary to determine if additional site characterization work is needed and if any mitigation is necessary at the site to ensure protection of human health and the environment from any hazardous substance releases or contamination identified.

Impacts from Generation and Management of Wastes during Construction, Operation and Project Closure/Decommissioning

As mentioned previously, staff considers project waste management to result in no significant impacts (as defined per CEQA guidelines in Checklist Section XVI) if there is

[1] Title 20, California Code of Regulations, section 1704(c) and Appendix B, section (g)(12)(A). Note that the Phase I ESA must be prepared according to American Society for Testing and Materials protocol or an equivalent method agreed upon by the applicant and the Energy Commission staff.

available landfill capacity and the project complies with LORS. Staff reviewed the applicant's proposed solid and hazardous waste management methods during project construction, operation, and closure/decommissioning, and determined if the methods proposed are consistent with the LORS identified for waste disposal and recycling. Staff also reviewed the capacity available at off-site treatment and disposal sites and determined whether or not the proposed power plant's waste would impact the available capacity.

C.14.4.3 DIRECT/INDIRECT IMPACTS AND MITIGATION

Existing Site Conditions

A Phase I ESA, dated November 14, 2008, was prepared by URS in accordance with the American Society for Testing and Materials Standard Practice E 1527-05 for ESAs. The Phase I ESA addressed conditions on the Calico Solar Project site located near Hector Road north of Interstate 17 east of Newberry Springs, San Bernardino County, California 92365 and is included as Appendix T of the project AFC. The ESA did not identify any Recognized Environmental Conditions (RECs) in connection with historic or current site operations. A REC is the presence or likely presence of any hazardous substances or petroleum products on a property under the conditions that indicated an existing release, past release, or a material threat of a release of any hazardous substance or petroleum products into structures on the property or in the ground, groundwater, or surface water of the property.

The Phase I ESA was prepared for 17 contiguous parcels totaling approximately 8,328 acres of vacant, undeveloped BLM desert land and privately owned land. The site is bisected by the BNSF railroad easement. There is a former rock crusher/ore processing area located in the northeastern corner of the site. The processing area was once a part of Logan Mine (SES 2008f, Appendix T and Tessera Solar 2009g, Data Response 88). The Logan Mine produced primarily manganese and iron with trace production of phosphorus-phosphates, silica and sulfur (SES 2008a, Appendix T and Tessa Solar 2009g, Data Response 89). Staff spoke with George Kenline, senior geologist, County of San Bernardino Land Use Services Division, and verified that manganese and iron ore production and processing were not considered hazardous operations (Kenline 2009). Manganese is a common metal, present in many minerals and in ground water. Naturally occurring manganese ores are not particularly hazardous and are not known to be a carcinogen. Most manganese related health problems have historically been found as an occupational hazard, from inhalation and/or ingestion with workers that mine and process these ores. Recommendations for people working around mining areas particularly metal mines include dust suppression and or respiratory protection (Springer 2009).

In the event that contamination is identified during any phase of construction, staff proposes Condition of Certification **WASTE-1** that would require that an experienced and qualified Professional Engineer or Professional Geologist be available for consultation in the event contaminated soil is encountered. If contaminated soil is identified, **WASTE-2** would require that the Professional Engineer or Professional Geologist inspect the site, determine what is required to characterize the nature and

extent of contamination, and provide a report to the Energy Commission Compliance Project Manager (CPM) and DTSC with findings and recommended actions.

Proposed Project

Proposed Project - Construction Impacts and Mitigation

Site preparation and construction of Phases I and II of the proposed Calico Solar Project and its associated facilities would last approximately 48 months and generate both non-hazardous and hazardous wastes in solid and liquid forms (SES 2008f 5.14-1). Before construction can begin, the project owner will be required to develop and implement a Construction Waste Management Plan per proposed Condition of Certification **WASTE-3** to ensure that the waste will be recycled when possible and properly landfilled when necessary.

Non-Hazardous Wastes

Construction activities (including construction of the substation and portable SunCatcher assembly buildings) would generate an estimated 40 cubic yards per week of non-hazardous solid wastes, consisting of scrap wood, steel, glass, plastic, and paper. Of these items, recyclable materials would be separated and removed as needed to recycling facilities. Non-recyclable materials (insulation, other plastics, food waste, roofing materials, vinyl flooring and base, carpeting, paint containers, packing materials, etc.) would be disposed at a Class III landfill; the Applicant expects emptying of a 40-cubic yard container of non-recyclable waste on a weekly basis during construction of the buildings, and once a month thereafter (SES 2008f, Table 5.14-2). Construction of the substation would generate an estimated 1,050 cubic yards of waste (Tessera Solar 2009z, Data Response 173). The SunCatcher assembly buildings would be removed from the site after construction. Decommissioning and removal of the buildings would generate approximately 80 cubic yards of waste consisting of surplus packing materials, lumber, cardboard, lighting, gaskets, and wiring (Tessera Solar 2009z, Data Response 172). Concrete pads under the buildings would remain after the buildings are removed.

Non-hazardous liquid wastes would be generated during construction, and would include storm water runoff and sanitary waste. Storm water runoff would be managed in accordance with appropriate LORS. Sanitary wastes would be pumped to tanker trucks by licensed contractors for transport to a sanitary water treatment plant. Please see the **SOIL AND WATER RESOURCES** section of this document for more information on the management of project wastewater.

Hazardous Wastes

During construction, anticipated hazardous wastes include waste paint, spent construction solvents, waste cleaners, waste oil, oily rags, waste batteries, and spent welding materials. Estimated amounts are 1 cubic yard of empty containers (per week), 200 gallons of oils, solvents, and adhesives (every 90 days), and 20 batteries (per year). Empty hazardous material containers would be returned to the vendor or disposed at a hazardous waste facility; solvents, used oils, paint, oily rags, and adhesives would be recycled or disposed at a hazardous waste facility; and spent batteries would be disposed at a recycling facility (SES 2008f, Table 5.14-2).

The generation of hazardous waste requires a unique hazardous waste generator identification number. The hazardous waste generator number is determined based on site location and therefore, both the construction contractor and the project owner/operator could be considered the generator of hazardous wastes at the site. The project owner would be required to obtain a unique hazardous waste generator identification number for the site prior to starting construction, pursuant to proposed Condition of Certification **WASTE-4**. This would ensure compliance with California Code of Regulation Title 22, Division 4.5.

Hazardous waste would be collected in hazardous waste accumulation containers and stored in a laydown area, warehouse/shop area, or storage tank on equipment skids for less than 90 days. The accumulated wastes would then be properly manifested, transported, and disposed of at a permitted hazardous waste management facility by licensed hazardous waste collection and disposal companies. Staff reviewed the disposal methods and concluded that all wastes would be disposed of in accordance with all applicable LORS. Should any construction waste management-related enforcement action be taken or initiated by a regulatory agency, the project owner would be required by the proposed Condition of Certification **WASTE-5** to notify the Compliance Project Manager (CPM) whenever the owner becomes aware of this action.

Staff has reviewed the proposed waste management methods described in AFC section 5.14.2.1, and in the responses to data requests, and concludes that project construction wastes would be managed in accordance with all applicable LORS.

In the event that construction excavation, grading, or trenching activities for the proposed project encounter potentially contaminated soils, specific waste handling, disposal, or other precautions may be necessary pursuant to hazardous waste management LORS. Staff finds that proposed Conditions of Certification **WASTE-1** and **-2** would be adequate to address any soil contamination contingency that may be encountered during construction of the project and would further support compliance with LORS.

Proposed Project - Construction and Demolition (C&D) Waste Diversion and Mitigation

The Integrated Waste Management Act of 1989 [Assembly Bill (AB) 939, Sher, Chapter 1095, Statutes of 1989] set landfill waste diversion goals of 50 percent (by 2000) for local jurisdictions. To meet this goal, many jurisdictions require applicants for construction and demolition projects to submit a reuse/recycling plan for at least 50 percent of C&D materials prior to the issuance of a building or demolition permit. The San Bernardino Integrated Waste management Authority does not have a County Demolition Waste Diversion Program (Tessera Solar 2009g, Data Response 86). While the Calico Solar Project is not responsible to a local jurisdiction staff will require the applicant to meet the 50 percent waste diversion rate. Adoption of Condition of Certification **WASTE-6** will ensure the applicant meets the waste diversion goals of the C&D program. Staff believes that compliance with proposed Condition of Certification **WASTE-6** would also help ensure that project wastes are managed properly and further reduce potential impacts to local landfills from project wastes.

Proposed Project - Operation Impacts and Mitigation

The proposed Calico Solar Project would generate both non-hazardous and hazardous wastes in solid and liquid forms under normal operating conditions. Table 5.14-2 of the project AFC gives a summary of the anticipated operation waste streams, estimated waste volumes and generation frequency, and proposed management methods. Before operations can begin, the project owner would be required to develop and implement an Operations Waste Management Plan as required in the proposed Condition of Certification **WASTE-7**. This would ensure that an accurate record is maintained of the project's waste storage, generation, and disposal, and compliance with waste regulations is maintained during operation.

Non-Hazardous Solid Wastes

Non-hazardous solid wastes generated during project operations would consist of glass, paper, wood, plastic, cardboard, deactivated equipment and parts, defective or broken electrical materials, empty non-hazardous containers, and other miscellaneous solid wastes. The project would generate approximately 10 cubic yards of non-hazardous solid waste per week (SES 2008f Table 5.14-3). Such wastes would be recycled to the greatest extent possible, and the remainder would be removed on a regular basis for disposal in a Class III landfill. Non-hazardous oily rags (one 55-gallon drum per month) would be laundered at an authorized recycle facility. Sanitary wastewater solids would be treated with an onsite septic system, and sludge would be delivered to an off-site disposal facility.

Non-Hazardous Liquid Wastes

Non-hazardous liquid wastes would be generated during facility operation and are discussed in the **SOIL AND WATER RESOURCES** section of this document.

Hazardous Wastes

The project owner/operator would be considered the generator of hazardous wastes at the site during facility operations. Therefore, the project owner's unique hazardous waste generator identification number, obtained prior to construction in accordance with proposed Condition of Certification **WASTE-4**, would be retained and used for hazardous waste generated during facility operation.

Hazardous wastes that may be generated during routine project operation include motor oil and coolant from the PCU, batteries, oily absorbent and spent oil filters, and used hydraulic fluid (SES 2008af p. 5.14-11). In addition, spills and unauthorized releases of hazardous materials or hazardous wastes may generate contaminated soils or cleanup materials that may also require management and disposal as hazardous waste. Proper hazardous material handling and good housekeeping practices would help keep spill wastes to a minimum. However, to ensure proper cleanup and management of any contaminated soils or waste materials generated from hazardous materials spills, staff proposes Condition of Certification **WASTE-8,** requiring the project owner/operator to document, clean up, and properly manage and dispose of wastes from any hazardous materials spills or releases in accordance with all applicable federal, state, and local requirements. More information on project hazardous materials management spill reporting, containment, and spill control and countermeasures plan provisions for the

project are provided in the **HAZARDOUS MATERIALS MANAGEMENT** section of this document.

The amount of hazardous wastes generated during operation of the Calico Solar Project would be minor, with source reduction and recycling of wastes implemented whenever possible. The hazardous wastes would be accumulated on site, transported off site by licensed hazardous waste haulers, and recycled or disposed of at authorized disposal facilities in accordance with established standards applicable to generators of hazardous waste (Title 22, CCR, §66262.10 et seq.). Should any operations waste management-related enforcement action be taken or initiated by a regulatory agency, the project owner would be required by proposed Condition of Certification **WASTE-5** to notify the CPM when advised of any such action.

Each solar Stirling engine contains 4 quarts of oil (Tessera Solar 20090z, Data Response 167). The PCU engine oil will be stored in four 150-gallon capacity double-walled storage tanks (Tessera Solar 2009z, Data Response 168). Two tanks will store oil recovered from the PCU's while the oil is waiting to be filtered for re-use in the engine. Maintenance of the Power Conversion Units (PCU) and other mechanical devices (e.g., drive repair) will be performed in onsite service stations. These service stations consist of modular, containerized work stations to perform equipment prewash and inspection, disassembly/reassembly, parts storage, end of service inspection, etc. The prewash and inspection station will include heated, pressurized water spray to clean engine components before maintenance performance. Expected waste water production is 15 gallons per wash (3 gpm sprayer for 5 minutes). The waste water generated will be captured in the service station and diverted to containers (e.g., drums) for offsite recycling by 3rd party provider(s). Prior to disassembly of engines, the fluids will be drained and captured for recycling. This includes 10.1 gallons of coolant (Thermocool HS Coolant – ethylene glycol and deionized water) and 1 gallon of engine oil (Mobil 1 Synthetic 10W-30). These engine fluids will be captured, aggregated in containers (e.g., drums) and recycled by 3rd party provider(s). Staff recommends that the collection and recycling of this waste water be managed in accordance with applicable BMP's and LORS.

A Hazardous Materials Business Plan, which outlines hazardous materials handling, storage, spill response, and reporting procedures, will be prepared before construction activities. If a spill or release of hazardous materials should occur during operations, the spill area will be bermed or controlled as quickly as practical to minimize the footprint of the spill. Finally, catch pans will be placed under equipment hose connections to catch potential spills during fueling and servicing (Tessera Solar 2009z, Data Response 169).The Lahontan Regional Water Quality Control Board would require a Spill Prevention, Control and Countermeasure Plan (SPCC) (Tessera Solar 2009z, Data Responses 170 & 171) in accordance with Title 40 CFR, Section 112.

The Calico Solar Project will have more than 34,000 gallons of oil contained within the SunCatchers on site. Federal Code of Regulations (40 CFR 112 Subpart B, Spill Prevention, Control and Countermeasures Plan (SPCC)) requires owners or operators of non-transportation-related bulk petroleum storage facilities that have an aggregate aboveground storage capacity greater than 1,320 gallons or a buried storage capacity greater than 42,000 gallons to prepare and maintain a site-specific SPCC Plan for their

facility, if a risk to "Waters of the United States" due to an oil spill at the project site is established. Since there are no known Waters of the United States[2] in the project area, a SPCC Plan is not required by the federal regulation,

The California Aboveground Storage Act (California Health and Safety Code, Sections 25270 through 25270.13) does require that a SPCC Plan must be prepared when "Waters of the State"[3], which include groundwater, may be at risk due to an oil spill at the project site. Therefore, the Calico Solar Project will be required to prepare a SPCC Plan. The above regulations would also require the immediate reporting of a spill or release of 42 gallons or more to the California Office of Emergency Services and the Certified Unified Program Agency (CUPA). There will be considerably more oil stored on site for future use, for additional information, and the requirements for a SPCC Plan for the project are further discussed in the **HAZARDOUS MATERIALS MANAGEMENT** section of this document.

Proposed Project - Closure and Decommissioning Impacts and Mitigation

The closure or decommissioning of the Calico Solar Project would produce both hazardous and non-hazardous solid and liquid waste. The project's General Compliance Conditions of Certification, including Compliance Monitoring and Closure Plan (Compliance Plan) have been established as required by Public Resources Code section 25532. The plan provides a means for assuring that the facility is constructed, operated and closed in compliance with public health and safety, environmental and other applicable regulations, guidelines, and conditions adopted or established by the California Energy Commission. Required elements of a facility's closure would be outlined in a facility closure plan as specified in Conditions of Certification **Compliance-11**, **-12**, and **-13**. To ensure adequate review of a planned project closure, the project owner shall submit a proposed facility closure plan to the Energy Commission for review and approval at least 12 months (or other period of time agreed to by the CPM) prior to commencement of closure activities. The facility closure plan will document non-hazardous and hazardous waste management practices including: the inventory, management, and disposal of hazardous materials and wastes, and permanent disposal of permitted hazardous materials and waste storage units.

The handling and management of waste generated by the Calico Solar Project will follow the hierarchical approach of source reduction, recycling, treatment, and disposal as specified in California Public Resources Code Sections 40051 and 40196. The first priority of the project owner will be to use materials that reduce the waste that is generated. The next level of waste management will involve reusing or recycling wastes. For wastes that cannot be recycled, treatment will be used, if possible, to make the waste nonhazardous. Finally, waste that cannot be reused, recycled or treated would be transported off site to a permitted treatment, storage, or disposal facility. Staff expects that there will be adequate landfill capacity available to dispose of both non-hazardous and hazardous waste from the closure or decommissioning of the proposed

[2] Waters of the United States essentially includes all surface waters like navigable waters and their tributaries, all interstate waters and tributaries, all adjacent wetlands, all impoundments of these waters and all areas connected via Commerce Clause connections.

[3] Waters of the state means any surface water or groundwater, including saline waters, within the boundaries of the state.

project. Conditions of Certification **WASTE-3** through **-8** would continue to apply to the Calico Solar Project during closure or decommissioning of the project.

Proposed Project - Impact on Existing Waste Disposal Facilities

Non-Hazardous Solid Wastes

Construction and operation of the proposed project would respectively generate 41 cubic yards and 10 cubic yards per week of nonhazardous solid waste (wood, paper/cardboard, glass, plastic, insulation, and concrete), respectively. The waste would be stored onsite for less than 30 days, and then recycled or disposed of in a Class III landfill.

Table 5.14-1 of the project AFC identifies four waste disposal facilities in San Bernardino County that could potentially take the non-hazardous construction and operation wastes generated by the Calico Solar Project. The remaining combined capacity of the four landfill facilities that are currently operating is over 93 million cubic yards Table 5.14-1. The total amount of non-hazardous solid waste generated from project construction is estimated to be 7,872 cubic yards (41 cubic yards per week for 48 months), and the total amount from lifetime operations is estimated to be 20,800 cubic yards (10 cubic yards per week for 40 years). These quantities include both recyclable and non-recyclable wastes; Additional non-recyclable sanitary sludge (the non-liquid portion of 5,000 gallons of wastewater per month during operation) and saltcake (90,200 pounds per year of operation) would also be disposed off-site (SES 2008f Table 5.14-3). The total non-recyclable solid waste would contribute much less than 1 percent of the available landfill capacity. Staff finds that disposal of the solid wastes generated by the Calico Solar Project can occur without significantly impacting the capacity or remaining life of any of these facilities.

Hazardous Wastes

AFC Table 5.14-1 lists landfills and recycling facilities that could be used to manage project wastes. Two hazardous waste (Class I) disposal facilities are currently accepting waste and could be used to manage Calico Solar Project wastes: the Clean Harbors Buttonwillow Landfill in Kern County and the Chemical Waste Management Kettleman Hills Landfill in Kings County. The Kettleman Hills facility also accepts Class II and Class III wastes. In total, there is a combined excess of 16 million cubic yards of remaining hazardous waste disposal capacity at these landfills, with at least 30 years remaining in their operating lifetimes (EEC2006a, Section 8.14.3.5.2). In addition, the Kettleman Hills facility is in the process of permitting an additional 4.6 to 4.9 million cubic yards of disposal capacity (Waste Management 2009), and the Buttonwillow facility has 40 years to reach its capacity at its current disposal rate (CEC2008aa).

Hazardous wastes generated during construction and operation would be recycled to the extent possible and practical. Those wastes that cannot be recycled would be transported off site to a permitted treatment, storage, or disposal facility. As calculated from waste streams presented in AFC Tables 5.14-2 and 5.14-3 (SES 2008f), staff calculated that approximately 225 cubic yards of recyclable and non-recyclable hazardous waste would be generated over the 48 month construction period. Approximately 50 cubic yards of hazardous non-recyclable waste would be generated

over the 40-year operating lifetime. Thus hazardous wastes from the Calico Solar Project requiring off-site disposal would be significantly less than the remaining capacity of either Class 1 waste facility.

C.14.4.4 CEQA LEVEL OF SIGNIFICANCE

Absent any unusual circumstances, staff considers project compliance with LORS and staff's conditions of certification to be sufficient to ensure that no significant impacts (per guidelines in CEQA Appendix G: Environmental Checklist Section XVI – Utilities and Service systems) would occur as a result of project waste management.

C.14.5 REDUCED ACREAGE ALTERNATIVE

The Reduced Acreage alternative would essentially be a 275 MW solar facility located within the central portion of the proposed 850 MW project. It was developed because it could be constructed without the necessity of a new 500 kV transmission line, and would avoid several other environmental impacts. This alternative's boundaries and the revised locations of the transmission line, substation, laydown, and control facilities are shown in **Alternatives Figure 1**.

C.14.5.1 SETTING AND EXISTING CONDITIONS

The general setting and existing conditions would remain as described in C.14.4.1 although the land requirements would be proportionately reduced to reflect the smaller project size. Locations of laydown areas may also vary.

C.14.5.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

The Reduced Acreage Alternative would generate similar types of hazardous and non-hazardous wastes from construction, demolition and operation of the project. However, the quantities of waste would be reduced by 66 percent. The amount of non-hazardous and hazardous solid wastes generated under a Reduced Acreage Alternative that would require landfill/treatment would be approximately 3,000 and 74 cubic yards, respectively. Similar to the proposed project, wastes requiring off-site disposal would be significantly less than the remaining capacity of off-site disposal facilities. Similar to the proposed project, staff will not require investigation and remediation of soil and groundwater contamination. Disposal methods would remain the same as for the proposed project and the same Conditions of Certification (**WASTE 1 through 8)** would apply.

C.14.5.3 CEQA LEVEL OF SIGNIFICANCE

Similar to the proposed project, staff considers project compliance with LORS and staff's conditions of certification to be sufficient to ensure that no significant impacts would occur as a result of waste management associated with the Reduced Acreage Alternative.

C.14.6 AVOIDANCE OF DONATED AND ACQUIRED LANDS ALTERNATIVE

The analysis of the Donated and Acquired Lands Alternative has been moved to Section B.2 (Alternatives) of this document.

C.14.7 NO PROJECT/NO ACTION ALTERNATIVE

There are three No Project / No Action Alternatives evaluated as follows:

No Project / No Action Alternative #1: No Action on the Calico Solar Project application and on CDCA land use plan amendment

Under this alternative, the proposed Calico Solar Project would not be approved by the CEC and BLM and BLM would not amend the CDCA Plan. As a result, no solar energy project would be constructed on the project site and BLM would continue to manage the site consistent with the existing land use designation in the CDCA Land Use Plan of 1980, as amended.

The result of the No Project / No Action Alternative would be the following:

- The impacts of the proposed project would not occur. However, the land on which the project is proposed would become available to other uses that are consistent with BLM's land use plan, including another renewable energy project.

If the proposed project is not approved, renewable projects would likely be developed on other sites in San Bernardino County, the Mojave Desert, or in adjacent states as developers strive to provide renewable power that complies with utility requirements and State/Federal mandates. For example, there are dozens of other wind and solar projects that have applications pending with BLM in the California Desert District. There would be no impacts on waste management under this no action alternative.

No Project / No Action Alternative #2: No Action on the Calico Solar Project and amend the CDCA land use plan to make the area available for future solar development

Under this alternative, the proposed Calico Solar Project would not be approved by the CEC and BLM and BLM would amend the CDCA Land Use Plan of 1980, as amended, to allow for other solar projects on the site. As a result, it is possible that another solar energy project could be constructed on the project site. However, there would be no impacts on waste management as a result of this no action alternative; any future project would be evaluated for waste management impacts in a project-specific NEPA analysis.

No Project / No Action Alternative #3: No Action on the Calico Solar Project application and amend the CDCA land use plan to make the area unavailable for future solar development

Under this alternative, the proposed Calico Solar Project would not be approved by the CEC and BLM and the BLM would amend the CDCA Plan to make the proposed site unavailable for future solar development. As a result, no solar energy project would be

constructed on the project site and BLM would continue to manage the site consistent with the existing land use designation in the CDCA Land Use Plan of 1980, as amended. There would be no impacts on waste management under this no action alternative.

C.14.8 PROJECT-RELATED FUTURE ACTIONS - WASTE MANAGEMENT

This section examines the potential impacts of future transmission line construction, line removal, substation expansion, and other upgrades that may be required by Southern California Edison Company (SCE) as a result of the Calico Solar Project. The SCE upgrades are a reasonably foreseeable event if the Calico Solar Project is approved and constructed as proposed.

The SCE project will be fully evaluated in a future EIR/EIS prepared by the BLM and the California Public Utilities Commission. Because no application has yet been submitted and the SCE project is still in the planning stages, the level of impact analysis presented is based on available information. The purpose of this analysis is to inform the Energy Commission and BLM, interested parties, and the general public of the potential environmental and public health effects that may result from other actions related to the Calico Solar Project.

The project components and construction activities associated with these future actions are described in detail in Section B.3 of this Staff Assessment/EIS. This analysis examines the construction and operational impacts of two upgrade scenarios

- The **275 MW Early Interconnection Option** would include upgrades to the existing SCE system that would result in 275 MW of additional latent system capacity. Under the 275 MW Early Interconnection option, Pisgah Substation would be expanded adjacent to the existing substation, one to two new 220 kV structures would be constructed to support the gen-tie from the Calico Solar Project into Pisgah Substation, and new telecommunication facilities would be installed within existing SCE ROWs.
- The **850 MW Full Build-Out Option** would include replacement of a 67-mile 220 kV SCE transmission line with a new 500 kV line, expansion of the Pisgah Substation at a new location and other telecommunication upgrades to allow for additional transmission system capacity to support the operation of the full Calico Solar Project.

C.14.8.1 ENVIRONMENTAL SETTING

The environmental setting described herein incorporates both the 275 MW Early Interconnection and the 850 MW Full Build-Out options. The setting for the 275 MW Early Interconnection upgrades at the Pisgah Substation and along the telecomm corridors is included within the larger setting for the project area under the 850 MW Full Build-Out option, which also includes the Lugo-Pisgah transmission corridor.

The transmission lines and related facilities would be routed mostly through undeveloped publicly-owned desert and mountainous land with relatively few activities

that could generate hazardous wastes or contaminated areas. In the event that contamination is identified during any phase of construction, staff proposes Conditions of Certification **WASTE-1** and **WASTE-2** which would require that a Professional Engineer or Professional Geologist inspect the site, determine what is required to characterize the nature and extent of contamination, and provide a report to the Energy Commission Compliance Project Manager (CPM) and DTSC with findings and recommended actions.

Under the 850 MW Full Build-Out option, all existing 220 kV structures on the 67-mile Lugo-Pisgah 220 kV transmission line would be removed (more than 250 structures), as well as two existing 500 kV structures on the Lugo–Eldorado transmission line. Transmission line equipment to be removed would include existing 220 kV and 500 kV lattice steel structures and associated hardware (i.e., cross arms, insulators, vibration dampeners, suspension clamps, ground wire clamps, shackles, links, nuts, bolts, washers, cotters pins, insulator weights, and bond wires), as well as the transmission line conductor. Steel lattice tower footings, concrete caps and anchors would likely be cut/removed below ground level. Holes would be filled and compressed, and then the area would be smoothed to match surrounding grade. The disposal of or recycling of these structures would occur at permitted facilities.

At the Pisgah Substation, any excavated soil would likely be spread on a portion of the substation property. At the end of construction, all construction materials and debris would be removed from the area and recycled or properly disposed of offsite.

The closest landfills within San Bernardino County near the Pisgah Substation would be the Newberry Springs Medium Volume Transfer/Processing Facility in Newberry Springs (along I-40, approximately 20 miles west of the town of Pisgah), which has a maximum permitted throughput of 15 tons/day and allows Mixed Municipal waste, and the Barstow Sanitary Landfill, which is approximately 3 miles south of Barstow along Highway 247. The Barstow Sanitary Landfill allows a maximum permitted throughput of 750 tons/day, has a remaining capacity of 924,401 cubic yards, and accepts the following waste types: Agricultural, Construction/demolition, Industrial, Mixed municipal, Other designated, and Sludge (BioSolids). Other landfills along the transmission corridor include the Camp Rock Transfer Station in the Lucerne Valley and four other landfills in the Victorville/Hesperia area (Victorville Sanitary Landfill, Advance Disposal Transfer/Processing Facility, Victor Valley MRF & Transfer Station, and Victor Valley Regional Composting Facility) (CIWMB 2009).

Waste management activities associated with the proposed action would include the storage, transport, recycling, or disposal of all project waste streams. Waste streams generally include solid waste and liquid waste. For the purposes of this analysis, discharges to the atmosphere are not included as waste streams. Atmospheric discharges and air quality are described in the **AIR QUALITY** section. Solid waste would include office type materials (paper, cardboard, newspaper, etc.) and any other solid material that is stored or disposed of as a non hazardous waste. Liquid waste may include human septic waste, process fluid waste, and storm water runoff.

All waste streams are regulated and discharges or disposal of any waste material either requires specific permitting or disposal at a permitted facility based on the type of waste.

Both solid and liquid waste streams can be either hazardous or non hazardous, depending on the constituents in the waste stream and the characteristics (ignitability, reactivity, toxicity, and corrosivity) of the waste. The status of the waste stream determines both the storage options for the material, and the disposal method for the material.

Solid waste disposal sites are permitted as either Class III facilities, which accept municipal solid waste, or Class I facilities which accept hazardous waste. Within San Bernardino County, there are seven existing Class III commercial solid waste disposal facilities (CIWMB 2008). The proposed transmission line route has not been reviewed to determine the location of the transmission line relative to existing and proposed solid waste disposal facilities.

Liquid waste disposal facilities include municipal waste water treatment plants and individual sewage disposal systems (ISDS). Municipal waste treatment plants are allowed to receive residential, commercial, and industrial human sewage material, and some regulated industrial liquid waste streams. Residential human sewage waste can also be disposed of in ISDS. Any liquid waste stream that is considered hazardous must be disposed of in a Class I land fill or through a combination of recycling and disposal at a permitted facility.

Uncontrolled solid waste disposal facilities may be present within the proposed transmission line ROW area. These facilities may include historic fill areas associated with urban solid waste disposal, areas of domestic solid waste present on private property, or areas of illegal solid waste disposal on public lands. These types of facilities may or may not be publicly known, mapped, and identified. Public records for these facilities would be reviewed as part of a Phase 1 ESA completed prior to permitting of the project. Unknown areas of solid waste disposal may be encountered during project construction activities.

C.14.8.2 ENVIRONMENTAL IMPACTS

Construction would generate waste largely in the form of soil from structure/substation excavation, concrete from existing foundations, utility line cable, and scrap metal from the replacement of existing structures. The transmission structures, insulators, cross arms and all other associated hardware would be disposed of at an offsite location. This Staff Assessment also discusses impacts in the event contaminated soil is encountered. Hazardous wastes generated during construction and operation would be recycled to the extent possible and practical. Those wastes that cannot be recycled would be transported off site to a permitted treatment, storage, or disposal facility.

In addition, although Polychlorinated biphenyls (PCB) have been banned from use with electrical distribution and substation transformers by the U.S. EPA since 1985 (U.S. EPA 2009), some older pieces of electrical equipment within SCE's system may still contain PCBs. There is a likelihood that some PCB containing equipment would need to be removed from some of the project locations during the construction of the project and removal of the existing line. Therefore, there would be a potential for a PCB release to contaminate the environment in the event of a spill while handling and transporting PCBs.

Excavation required to construct the components of the project would primarily be limited to areas at existing and proposed structure locations, at underground fiber optic trench locations, and at the expanded Pisgah Substation locations. A contamination site record search would need to be conducted to determine existing known contaminated sites in the project vicinity. Therefore, it is possible that subsurface construction activities could accidentally disturb documented contamination sites, potentially mobilizing soil and/or groundwater contamination.

Finally, previously undocumented soil and or groundwater contamination could be encountered during tower and pole installation, trenching, grading, or other excavation related activities despite the steps taken to identify and avoid contamination. The applicant would be required to conduct site surveys prior to construction to determine whether these conditions could exist.

The presence of oil in a quantity greater than 1,320 gallons invokes Spill Prevention Control and Countermeasures (SPCC) regulations. The quantity of oil contained in any one of the planned 500/220 kV transformers would be in excess of the minimum quantity that requires such regulations. See **HAZARDOUS MATERIALS** for further discussion on this regulation.

C.14.8.3 MITIGATION

Mitigation, including preparation of a waste management plan, is recommended that would ensure that all construction materials and debris would be removed from the area and recycled or properly disposed of offsite. Conditions of Certification **WASTE-3** and **WASTE-6** outline proposed construction waste management plans and recycling mitigation methods that should be required. Although impacts to solid waste facilities and waste management would not be significant and no mitigation measure would be required, to further reduce adverse effects of the overall volume of waste from all of the project components, mitigation that would require SCE to recycle construction waste where feasible is recommended for implementation to ensure that maximum recycling activities would occur over the course of the entire project.

SCE would also be required to properly store, package, and label all hazardous waste; use only approved transporters; prepare hazardous waste manifests; keep detailed records; and appropriately train employees, in accordance with state and federal hazardous waste management requirements. Hazardous wastes would be accumulated onsite in accordance with accumulation time limits and then properly manifested, transported to, and disposed of at a permitted hazardous waste management facility by licensed hazardous waste collection and disposal companies. Utilization of portable liquid waste systems (port-a-potties) at all construction locations, including regular maintenance of the facilities, is recommended.

To identify and avoid documented contamination sites relative to the project sites, record searches specifically for the project locations would need to be conducted. Implementation of mitigation measures should require identification and avoidance of documented contamination sites, thus ensuring that the potential impacts caused by documented contaminated sites would be reduced to less than significant levels.

Soils testing should be conducted and analyzed by a professional, licensed Geotechnical Engineer or Geologist, to determine existing soil conditions. Borings in a sufficient quantity to adequately gather variations in the site soils should be conducted to remove sample cores for testing. The type of soils, soil pressure, relative compaction, resistivity, and percolation factor are among the items that should be tested for. If contaminants are encountered, special studies and remediation measures in compliance with environmental regulations should be implemented by qualified professionals.

During trenching, grading, or excavation work, mitigation measures should be developed that would require the contractor to observe the exposed soil for visual evidence of contamination. If visual contamination indicators are observed during construction, the contractor should be required to stop work until the material is properly characterized and appropriate measures are taken to protect human health and the environment. The contractor would also have to comply with the all local, State, and federal requirements for sampling and testing, and subsequent removal, transport, and disposal of hazardous materials. Requiring Conditions of Certification **WASTE-1** and **WASTE-2** would ensure the appropriate measures are taken to mitigate potential impacts due to the presence and disturbance of contaminated soils.

C.14.8.4 CONCLUSION

SCE transmission upgrades would comply with all applicable LORS regulating the management of hazardous and non-hazardous wastes during both project construction and operation. The Conditions of Certification included in the **WASTE MANAGEMENT** section of this Staff Assessment, SCE should be required to recycle construction waste where feasible, and identify potential soil contamination. In addition, the site should be managed such that contaminants would not pose a significant risk to humans or to the environment.

Implementing mitigation measures similar to the Conditions of Certification that are proposed in the Calico Solar Project Staff Assessment for construction and operation would avoid impacts to construction workers and environment if applied to the SCE transmission upgrade options.

C.14.9 CUMULATIVE IMPACTS

A project may result in a significant adverse cumulative impact where its effects are cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (California Code Regulation, Title 14, section 15130). NEPA states that cumulative effects can result from individually minor but collectively significant actions taking place over a period of time” (40 CFR §1508.7).

There is the potential for substantial future development in the San Bernardino Valley area and throughout the southern California desert region. Analysis of cumulative impacts is based on data provided in the following maps and tables (see **CUMULATIVE SCENARIO**):

- Cumulative Impacts Figure 1, Regional Renewable Applications;
- Cumulative Impacts Figure 2, Renewable Applications in the Barstow & Needles District Areas;
- Cumulative Impacts Figure 3, Newberry Springs/Ludow Area - Existing and Future/Foreseeable Projects;
- Cumulative Impacts Table 1, Renewable Energy Projects in the California Desert District
- Cumulative Impacts Table 2, Existing Projects in the Newberry Springs/Ludow Area; and
- Cumulative Impacts Table 3, Future Foreseeable Projects in the Newberry Springs/Ludlow Area.

The analysis in this section first defines the geographic area over which cumulative impacts related to waste management could occur. The cumulative impact analysis itself describes the potential for cumulative impacts to occur as a result of implementation of the Calico Solar Project along with the listed local and regional projects.

C.14.9.1 GEOGRAPHIC EXTENT

Cumulative impacts can occur within San Bernardino County if implementation of the Calico Solar Project could combine with those of other local or regional projects. Cumulative impacts could also occur as a result of development of some of the many proposed solar and wind development projects that have been or are expected to be under consideration by the BLM and the Energy Commission in the near future. Many of these projects are located within the California Desert Conservation Area, as well as on BLM land in Nevada and Arizona.

The geographic extent for the analysis of the cumulative impacts associated with the Calico Solar Project includes San Bernardino County. This geographic scope is appropriate because waste disposal facilities in San Bernardino County could easily handle all waste generated by the Calico Solar Project.

C.14.9.2 CUMULATIVE IMPACT ANALYSIS

Local Projects

The Calico Solar Project would generate non-hazardous solid waste that would add to the total waste generated in San Bernardino County. Non-hazardous solid waste generated by all of the past, present, and reasonably foreseeable projects presented in **Cumulative Impacts Table 2** and **Cumulative Impacts Table 3** would also be disposed of within San Bernardino County. However, project wastes would be generated in modest quantities, waste recycling would be employed wherever practical, and sufficient capacity is available at several treatment and disposal facilities to handle the volumes of wastes that would be generated by the project. Most of the reasonably foreseeable projects identified in **Cumulative Impacts Table 3** would generate smaller volumes of non-hazardous waste than the Calico Solar Project. The total amount of

available solid waste landfill capacity in San Bernardino County expected exceeds 93 million cubic yards (SES 2008f Table 5.14-1). Therefore, even if all 11 of these reasonably foreseeable projects were constructed, staff concludes that the non-hazardous waste generated by the Calico Solar Project would not result in significant cumulative waste management impacts.

As stated above, the non-recyclable component of the 225 cubic yards of hazardous construction waste and the less than 50 cubic yards per year of non-recyclable operations waste from the Calico Solar Project would be far less than staff's threshold of significance and would therefore not significantly impact the capacity or remaining life of the Class I waste facilities. The very small quantities of project hazardous waste and the similarly small quantities of hazardous waste that would potentially be generated by the reasonably foreseeable projects would not result in significant cumulative waste management impacts.

Regional Projects

Implementation of the multiple solar and wind projects proposed to be developed in southeastern California, southern Nevada, and western Arizona would result in an increase in generation of hazardous and non-hazardous solid and liquid waste and would add to the total quantity of waste generated in the states of California and Nevada. However, project wastes would be generated in modest quantities, waste recycling would be employed wherever practical, and sufficient capacity is available at several treatment and disposal facilities to handle the volumes of wastes that would be generated by the project. Therefore, impacts of the Calico Solar Project, when combined with impacts of the future solar and wind development projects currently proposed within southeastern California, southern Nevada, and western Arizona, would not result in significant and unavoidable cumulative impacts with regard to waste management.

C.14.9.3 CUMULATIVE IMPACT CONCLUSION

Impacts of the Calico Solar Project would combine with impacts of past, present, and reasonably foreseeable projects to result in a contribution to local and regional cumulative impacts related to waste management.

The amount of non-hazardous and hazardous wastes generated during construction and operation of the Calico Solar Project would add to the total quantity of hazardous and non-hazardous waste generated in San Bernardino County. However, project wastes would be generated in modest quantities, waste recycling would be employed wherever practical, and sufficient capacity is available at several treatment and disposal facilities to handle the volumes of wastes that would be generated by the project. Therefore, staff concludes that the waste generated by the Calico Solar Project would not make accumulatively considerable contribution to any cumulative waste management impacts in San Bernardino County or region (Tessera Solar 2010s).

C.14.10 COMPLIANCE WITH LORS

Energy Commission staff concludes that the proposed Calico Solar Project would comply with all applicable LORS regulating the management of hazardous and non-

hazardous wastes during both facility construction and operation. The applicant is required to recycle and/or dispose hazardous and non-hazardous wastes at facilities licensed or otherwise approved to accept the wastes.

Because hazardous wastes would be produced during both project construction and operation, the Calico Solar Project would be required to obtain a hazardous waste generator identification number from U.S. EPA. The Calico Solar Project would also be required to properly store, package, and label all hazardous waste; use only approved transporters; prepare hazardous waste manifests; keep detailed records; and appropriately train employees, in accordance with state and federal hazardous waste management requirements.

C.14.11 NOTEWORTHY PUBLIC BENEFITS

Staff has not identified any noteworthy public benefits associated with Waste Management.

C.14.12 RESPONSE TO COMMENTS

Staff received several comments from the applicant on the **Waste Management** section of the SA/DEIS (Tessera Solar 2010s). The comments and staff's responses to the applicant's comments are outlined below.

Comment: On Page C.14-13 of the SA/DEIS, staff states that hazardous wastes would be temporarily stored on site. The Applicant requests that the language be changed from "temporarily store" hazardous waste onsite to "accumulate" waste onsite.

Response: Staff has no objection to replacing "temporarily store" with "accumulate" and has made the corresponding change in this SSA.

Comment: On Page C.14-25 of the SA/DEIS, staff provides a "Cumulative Impact Conclusion." In order for the "Cumulative Impact Conclusion" to capture the cumulative impact analysis that precedes it, the applicant suggests the following revision to the last sentence of Section C.14.9.3:

> "Therefore, staff concludes that the waste generated by the Calico Solar Project would not ~~result in significant~~ <u>make a cumulatively considerable contribution to</u> any cumulative waste management impacts either locally in San Bernardino County or in the regionally."

Response: Staff has no objection to the clarifying language proposed and has made the corresponding change in this SSA.

Comment: On Page C.14-25 of the SA/DEIS, the applicant requests that the submittal timeline for the reuse/recycling plan in the Verification of Condition of Certification **WASTE-6** be revised from 60 days to 30 days.

Response: Staff agrees that the proposed modification to the Verification of Condition of Certification **WASTE-6** is appropriate and has made the corresponding change.

C.14.13 FACILITY CLOSURE

Staff has addressed facility closure and decommissioning impacts to Waste Management under individual headings in Assessment of Impacts and Discussion of Mitigation above. Conditions of Certification **Compliance-11**, **-12**, and **-13** also address the requirements for facility closure that would relate to Waste Management.

C.14.14 PROPOSED CONDITIONS OF CERTIFICATION/APPROVAL

WASTE-1 The project owner shall provide the resume of an experienced and qualified professional engineer or professional geologist, who shall be available during site characterization (if needed), demolition, excavation, and grading activities, to the CPM for review and approval. The resume shall show experience in remedial investigation and feasibility studies.

The professional engineer or professional geologist shall be given authority by the project owner to oversee any earth moving activities that have the potential to disturb contaminated soil and impact public health, safety and the environment.

Verification: At least 30 days prior to the start of site mobilization, the project owner shall submit the resume to the CPM for review and approval.

WASTE-2 If potentially contaminated soil is identified during site characterization, demolition, excavation or grading at either the proposed site or linear facilities, as evidenced by discoloration, odor, detection by handheld instruments, or other signs, the professional engineer or professional geologist shall inspect the site, determine the need for sampling to confirm the nature and extent of contamination, and provide a written report to the project owner, representatives of Department of Toxic Substances Control or Regional Water Quality Control Board, and the CPM stating the recommended course of action.

Depending on the nature and extent of contamination, the professional engineer or professional geologist shall have the authority to temporarily suspend construction activity at that location for the protection of workers or the public. If in the opinion of the professional engineer or professional geologist, significant remediation may be required, the project owner shall contact the CPM and representatives of the Department of Toxic Substances Control or Regional Water Quality Control Board, for guidance and possible oversight.

Verification: The project owner shall submit any reports filed by the professional engineer or professional geologist to the CPM within 5 days of their receipt. The project owner shall notify the CPM within 24 hours of any orders issued to halt construction.

WASTE-3 The project owner shall prepare a Construction Waste Management Plan for all wastes generated during construction of the facility and shall submit the plan to the CPM for review and approval prior to the start of construction. The plan shall contain, at a minimum, the following:

- A description of all construction waste streams, including projections of frequency, amounts generated, and hazard classifications; and
- Management methods to be used for each waste stream, including temporary on-site storage, housekeeping and best management practices to be employed, treatment methods and companies providing treatment services, waste testing methods to assure correct classification, methods of transportation, disposal requirements and sites, and recycling and waste minimization/source reduction plans.

Verification: The project owner shall submit the Construction Waste Management Plan to the CPM for approval no less than 30 days prior to the initiation of construction activities at the site.

WASTE-4 The project owner shall obtain a hazardous waste generator identification number from the United States Environmental Protection Agency (U.S.EPA) prior to generating any hazardous waste during project construction and operations.

Verification: The project owner shall keep a copy of the identification number on file at the project site and provide documentation of the hazardous waste generation and notification and receipt of the number to the CPM in the next scheduled Monthly Compliance Report after receipt of the number. Submittal of the notification and issued number documentation to the CPM is only needed once unless there is a change in ownership, operation, waste generation, or waste characteristics that requires a new notification to U.S.EPA. Documentation of any new or revised hazardous waste generation notifications or changes in identification number shall be provided to the CPM in the next scheduled compliance report.

WASTE-5 Upon notification of any impending waste management-related enforcement action by any local, state, or federal authority, the project owner shall notify the CPM of any such action taken or proposed against the project itself, or against any waste hauler or disposal facility or treatment operator with which the owner contracts, and describe how the violation will be corrected.

Verification: The project owner shall notify the CPM in writing within 10 days of becoming aware of an impending enforcement action. The CPM shall notify the project owner of any changes that will be required in the way project-related wastes are managed.

WASTE-6 The project owner shall provide a reuse/recycling plan for at least 50 percent of construction and demolition materials prior to any building or demolition. The project owner shall ensure compliance and shall provide proof of compliance documentation to the CPM, including a recycling and reuse summary report, receipts, and records of measurement. Project mobilization and construction shall not proceed until the CPM issues an approval document.

Verification: At least 30 days prior to the start of any construction or demolition activities, the project owner shall submit a reuse recycling plan to the CPM for review

and approval. The project owner shall ensure that project activities are consistent with the approved reuse/recycling plan and provide adequate documentation of the types and volumes of wastes generated, how the wastes were managed, and volumes of wastes diverted. Project mobilization and construction shall not proceed until CPM issues an approval document. Not later than 60 days after completion of project construction, the project owner shall submit documentation of compliance with the diversion program requirements to the CPM. The required documentation shall include a recycling and reuse summary report along with all necessary receipts and records of measurement from entities receiving project wastes.

WASTE-7 The project owner shall prepare an Operation Waste Management Plan for all wastes generated during operation of the proposed project and shall submit the plan to the CPM for review and approval. The plan shall contain, at a minimum, the following:

- A detailed description of all operation and maintenance waste streams, including projections of amounts to be generated, frequency of generation, and waste hazard classifications;
- Management methods to be used for each waste stream, including temporary on-site storage, housekeeping and best management practices to be employed, treatment methods and companies providing treatment services, waste testing methods to assure correct classification, methods of transportation, disposal requirements and sites, and recycling and waste minimization/source reduction plans;
- Information and summary records of conversations with the local Certified Unified Program Agency and the Department of Toxic Substances Control regarding any waste management requirements necessary for project activities. Copies of all required waste management permits, notices, and/or authorizations shall be included in the plan and updated as necessary;
- A detailed description of how facility wastes will be managed, and any contingency plans to be employed, in the event of an unplanned closure or planned temporary facility closure; and
- A detailed description of how facility wastes will be managed and disposed of upon closure of the facility.

Verification: The project owner shall submit the Operation Waste Management Plan to the CPM for approval no less than 30 days prior to the start of project operation. The project owner shall submit any required revisions to the CPM within 20 days of notification from the CPM that revisions are necessary.

The project owner shall also document in each Annual Compliance Report the actual volume of wastes generated and the waste management methods used during the year; provide a comparison of the actual waste generation and management methods used to those proposed in the original Operation Waste Management Plan; and update the Operation Waste Management Plan as necessary to address current waste generation and management practices.

WASTE-8 The project owner shall ensure that all spills or releases of hazardous substances, hazardous materials, or hazardous waste are documented and cleaned up and that wastes generated from the release/spill are properly managed and disposed of, in accordance with all applicable federal, state, and local requirements.

Verification: The project owner shall document management of all unauthorized releases and spills of hazardous substances, hazardous materials, or hazardous wastes that occur on the project property or related linear facilities. The documentation shall include, at a minimum, the following information: location of release; date and time of release; reason for release; volume released; how release was managed and material cleaned up; amount of contaminated soil and/or cleanup wastes generated; if the release was reported; to whom the release was reported; release corrective action and cleanup requirements placed by regulating agencies; level of cleanup achieved and actions taken to prevent a similar release or spill; and disposition of any hazardous wastes and/or contaminated soils and materials that may have been generated by the release. A copy of the unauthorized release/spill documentation shall be provided to the CPM within 30 days of the date the release was discovered.

C.14.15 CONCLUSIONS

Consistent with the three main objectives for staff's waste management analysis (as noted in the Introduction section of this analysis), staff provides the following conclusions:

After review of the applicant's proposed waste management procedures, staff concludes that project wastes would be managed in compliance with all applicable waste management LORS. Staff notes that construction, demolition, and operation wastes would be characterized and managed as either hazardous or non-hazardous waste. All non-hazardous wastes would be recycled to the extent feasible, and nonrecyclable wastes would be collected by a licensed hauler and disposed of at a permitted solid waste disposal facility. Hazardous wastes would be accumulated onsite in accordance with accumulation time, and then properly manifested, transported to, and disposed of at a permitted hazardous waste management facility by licensed hazardous waste collection and disposal companies.

However, to help ensure and facilitate ongoing project compliance with LORS, staff proposes Conditions of Certification **WASTE-1** through **-8**. These conditions would require the project owner to do all of the following:

- Ensure the project site is investigated and any contamination identified is remediated as necessary, with appropriate professional and regulatory agency oversight (**WASTE-1** and **-2**).
- Prepare Construction Waste Management and Operation Waste Management Plans detailing the types and volumes of wastes to be generated and how wastes will be managed, recycled, and/or disposed of after generation (**WASTE-3** and **-7**).
- Obtain a hazardous waste generator identification number (**WASTE-4**).

- Ensure that all spills or releases of hazardous substances are reported and cleaned-up in accordance with all applicable federal, state, and local requirements (**WASTE-8**).
- Comply with waste recycling and diversion requirements (**WASTE-6**).
- Report any waste management-related LORS enforcement actions and how violations will be corrected (**WASTE-5**).

The existing available capacity for the Class III landfills that may be used to manage nonhazardous project wastes exceeds 3.73 million cubic yards, with another 600 million cubic yards of capacity expected in the future with full operation of the Mesquite Regional Landfill. The total amount of non-hazardous wastes generated from construction, demolition and operation of the Calico Solar Project would contribute much less than 1 percent of the projected landfill capacity. Therefore, disposal of project generated non-hazardous wastes would have a less than significant impact on Class III landfill capacity.

In addition, the two Class I disposal facilities that could be used for hazardous wastes generated by the construction and operation of Calico Solar Project have a combined remaining capacity in excess of 16 million cubic yards, with another 4.6 to 4.9 million cubic yards of proposed capacity. The total amount of hazardous wastes generated by the Calico Solar Project would be less than significant in relation to the remaining permitted capacity. Therefore, impacts from disposal of Calico Solar Project generated hazardous wastes would also have a less than significant impact on the remaining capacity at Class I landfills.

Staff concludes that management of the waste generated during construction and operation of the Calico Solar Project would not result in any significant adverse impacts, and would comply with applicable LORS, if the waste management practices and mitigation measures proposed in the Calico Solar Project AFC and staff's proposed conditions of certification are implemented.

C.14.16 REFERENCES

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CEC 2008k – BLM and Energy Commission staff's Data Requests Set 1 Part 1 (1-52). November 14, 2008.

CEC 2008l – Energy Commission staff's Issues Identification Report. November 17, 2008.

CEC 2008m – BLM and Energy Commission staff's Data Requests Set 1 Part 2 (53-127). December 2, 2008.

CEC 2009d – Energy Commission staff's Approach to Cumulative Analysis and Alternatives. February 10, 2009.

CEC 2009p – Data Requests Set 1 (tn: 52052), June 17, 2009.

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SES (Stirling Energy Systems Solar Two, LLC) 2008a – Application for Certification for the Stirling Energy Systems (SES) Solar Two Project, Volumes 1 and 2. Submitted to the California Energy Commission, June 30, 2008.

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Kenline 2010 – George Kenline, Senior Geologist, County of San Bernardino, Land Use Services Department, December 30, 2009 discussed Logan Mine operation and hazards of manganese mining operations.

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SES 2008f – SES Solar One Project Application for Certification, December 1, 2008 (tn: 49181).

SES 2008g – Applicant's Response to BLM and Energy Commission Data Request Set 1, Part 1 (1-52), December 8, 2008.

SES 2009h – Applicant's Response to BLM and Energy Commission Data Requests 1-3, 5-10, 24-26, 31-33, 36-38, 44, and 111-127, March 19, 2009.

SES 2009i – Applicant's Response to BLM and Energy Commission Data Requests 53-110, March 26, 2009.

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Springer 2009 – Marc Springer, Geologist, BLM California State Office email, January 4, 2010, discussed manganese mining hazards.

Tessera Solar 2009g – Applicant's Responses to CEC and BLM Data Requests Set 1 Part 1 (tn: 52466), July 17, 2009.

Tessera Solar 2009l – Applicants' Response to CEC & BLM Data Requests 113-127 CEC Data Requests Set 1, Part 2 (tn: 52956), August 20, 2009.

Tessera Solar 2009o – Applicant's Responses to CEC & BLM Data Request 1-91 Data Request Set 1, Part 1 (tn: 53067), August 28, 2009.

Tessera Solar 2009q – Applicant's Responses to CEC and BLM Data Requests 1-48, 81, and 109-112 Set 1 Parts 1 and 2 (tn: 53093), August 31, 2009.

Tessera Solar 2009z – Applicant's Response to CEC & BLM Data Requests Set 2 (tn: 54386), December 4, 2009.

Tessera Solar 2009bb – Applicant's Updated Project Map (tn: 54427), December 10, 2009.

Tessera Solar 2010s – Applicant's Submittal of Comments on the SA-DEIS (tn: 56287), April 14, 2010.

Tessera Solar 2010ag – Applicant's Submittal of Alternative Site Layout No. 2 (tn: 57018), June 2, 2010.

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Tessera Solar 2010aj – Clarifications to Applicant’s Responses to CEC email (tn: 57234), June 16, 2010.

Waste Management 2009 – Kettleman Hills Facility Project Update. <http://www.kettlemanhillsfacts.com/project_update.html>

C.15 – WORKER SAFETY AND FIRE PROTECTION

Testimony of Rick Tyler and Alvin J. Greenberg, Ph.D.

C.15.1 SUMMARY OF CONCLUSIONS

Energy Commission Staff (hereafter referred to as staff) conclude that if the applicant for the proposed Calico Solar Project (formerly the Stirling Energy Systems Solar One Project) provides project construction safety and health and project operations and maintenance safety and health programs, as required by conditions of certification **WORKER SAFETY-1** through **-8**, the project would incorporate sufficient measures to both ensure adequate levels of industrial safety and comply with applicable laws, ordinances, regulations, and standards. These proposed conditions of certification ensure that these programs, proposed by the applicant, will be reviewed by the appropriate agencies before they are implemented. The conditions also require verification that the proposed plans adequately ensure worker safety and fire protection and comply with applicable laws, ordinances, regulations, and standards. Therefore, with mitigation, no adverse impacts to worker safety and fire protection are expected under CEQA.

Staff has also determined that the project will have a significant impact on the local fire protection services. The proposed facility would be located in an area that is currently served by the San Bernardino County Fire Department (SBCFD). While staff believes that the SBCFD is adequately staffed, trained, and equipped to respond to a fire, hazardous materials spill, or a need for Emergency Medical Services in a reasonable time period given the great distances involved in a desert location, the added emergency response needs will pose significant added demands on local fire protection services, thus resulting in shifting equipment and personal from station to station to cover the entire county (the largest county in California and in the continental United States) and therefore staff proposes Condition of Certification **WORKER SAFETY-7** as mitigation to reduce the impacts to less than significant.

C.15.2 INTRODUCTION

Worker safety and fire protection are regulated through federal, state, and local laws, ordinances, regulations, and standards (LORS). Industrial workers at the facility both operate equipment and handle hazardous materials daily, and could face hazards resulting in accidents and serious injury. Protection measures are employed to eliminate or reduce these hazards or minimize their risk through special training, protective equipment, and procedural controls. The purpose of this **Worker Safety and Fire Protection** section of this Supplemental Staff Assessment (SAA) is to assess the worker safety and fire protection measures proposed by the Calico Solar applicant and determine whether the applicant has proposed adequate measures to:

- Comply with applicable safety LORS;
- Protect workers during the construction and operation of the facility;
- Protect against fire; and
- Provide adequate emergency response procedures.

C.15.3 METHODOLOGY AND THRESHOLDS FOR DETERMINING ENVIRONMENTAL CONSEQUENCES

C.15.3.1 LAWS, ORDINANCES, REGULATION, AND STANDARDS

Worker Safety and Fire Protection Table 1
Laws, Ordinances, Regulations, and Standards

Applicable Law	Description
Federal	
29 U.S. Code sections 651 et seq. (Occupational Safety and Health Act of 1970)	This Act mandates safety requirements in the workplace, with the purpose of "[assuring] so far as possible every working man and woman in the nation safe and healthful working conditions and to preserve our human resources" (29 USC § 651).
29 CFR sections 1910.1 to 1910.1500 (Occupational Safety and Health Administration Safety and Health Regulations)	These sections define the procedures for promulgating regulations and conducting inspections to implement and enforce safety and health procedures to protect workers, particularly in the industrial sector.
29 CFR sections 1952.170 to 1952.175	These sections provide federal approval of California's plan for enforcement of its own safety and health requirements, in lieu of most of the federal requirements found in 29 CFR §1910.1 to 1910.1500.
State	
2007 Edition of California Fire Code and all applicable NFPA standards (24 CCR Part 9)	NFPA standards are incorporated into the California State Fire Code. The fire code contains general provisions for fire safety, including road and building access, water supplies, fire protection and life safety systems, fire-resistive construction, storage of combustible materials, exits and emergency escapes, and fire alarm systems.
Title 24, California Code of Regulations (24 CCR § 3, et seq.)	The California Building Code is comprised of 11 parts containing building design and construction requirements as they relate to fire, life, and structural safety. It incorporates current editions of the International Building Code, including the electrical, mechanical, energy, and fire codes applicable to the project.
8 CCR all applicable sections (Cal/OSHA regulations)	Requires that all employers follow these regulations as they pertain to the work involved. This includes regulations pertaining to safety matters during the construction, commissioning, and operation of power plants, as well as safety around electrical components, fire safety, and hazardous materials usage, storage, and handling.
24 CCR section 3, et seq.	Incorporates the current edition of the International Building Code.
Health and Safety Code sections 25500 to 25541	Requires a Hazardous Materials Business plan detailing emergency response plans for hazardous materials emergencies at a facility.

Applicable Law	Description
Local (or locally enforced)	
Fire and Hazardous Materials: San Bernardino County Code, Title 2, Division 3, Chapter 1 et seq.	Includes California Fire Code and specific codes to regulate permits activities and administrative penalties. Adopts the 2007 California Fire Code and adopts State requirements and guidelines as governing hazardous materials release response plans and inventories.
Health and Safety: San Bernardino County Code Title 3, Division 1, et seq.	Includes specific codes to regulate permits, activities (e.g., solid waste management), and administrative penalties.
Building and Construction: San Bernardino County Code, Title 6, Division 3, Chapter 1 et seq.	Adopts national standards such as Uniform Building Code and National Electrical Code.

C.15.4 PROPOSED PROJECT

C.15.4.1 SETTING

The originally proposed Calico Solar Project site was approximately 8,230 acres of Bureau of Land Management (BLM) land located in San Bernardino County, California (SES 2008f page 3-3). The proposed project site was reduced in acreage to 6,215 acres to avoid environmental resources. The site is located on Hector Road north of Interstate 40 (I-40), 17 miles east of Newberry Springs, about 37 miles east of Barstow, and 115 miles east of Los Angeles, California in the Mojave Desert (SES 2008a). The project consists of 29 contiguous parcels and the Burlington Northern Santa Fe (BNSF) railroad bisects the site from west to east. The project would be located in an undeveloped part of San Bernardino County adjacent to Interstate 40; lands in this part of the Mojave Desert are managed predominantly by the Bureau of Land Management (BLM). Land uses in the vicinity of the proposed project include transportation use, open space, and resource conservation (SES 2008a, Section 5.9.1). There are a total of three residences within a 3-mile radius of the proposed site, the nearest of which is located approximately 1,300 feet south of the property boundary on the other side of I-40. There are no sensitive receptors in the vicinity of the project site (SES 2008a, Section 5.16.1 and Figure 5.16-1).

The site elevation slopes gently to the northeast and ranges from 1,925 to 3,050 feet above sea level (SES 2008a, Section 5.2). Topography in the vicinity of the project is varied in elevation, with regions of elevated terrain existing mostly to the north and east, where the sloping grade continues beyond the project boundary (SES 2008a, Section 5.2.1 and Figure 5.2-1).

The proposed project would utilize SunCatchers — 40-foot-tall Stirling dish technology developed by the applicant — which track the sun and focus solar energy onto Power

Conversion Units (PCU) to generate electricity. Each PCU consists of a solar receiver heat exchanger and a closed-cycle, high-efficiency Solar Stirling Engine specifically designed to convert solar power to rotary power via a thermal conversion process. The engine drives an electrical generator to produce grid-quality electricity.

Fire support services to the site would be under the jurisdiction of the San Bernardino County Fire Department (SBCFD). However, the nearest fire station is that of Newberry Springs Fire Department and the applicant has stated that "emergency services will be coordinated" with that fire district (SES 2008a, page 5.17-14). Staff believes that the proper jurisdiction is the SBCFD and that all emergency services should be coordinated with San Bernardino County. The applicant appears to agree with staff's opinion in that the Application for Certification (AFC) also states that the SBCFD "will provide primary fire protection, fire fighting, and emergency response services to the Project Site (SES 2008 a, page 5.17-17).

There are a total of twenty fire stations within the SBCFD North Desert Division, the closest of which would be the Harvard and Amboy stations. The response time can range from 40 minutes to no response if they are unavailable. In addition to the SBCFD stations and that of Newberry, the Barstow Fire Protection District located about 37 miles away would respond to the Calico site though a mutual aid agreement. All personnel at the SBCFD are trained as Emergency Medical Technicians (EMT) Level-1 and as first responders to hazardous materials incidents. The large majority of personnel are also trained paramedics (SBCFD 2010).

The applicant has stated that certain plant personnel would be trained as a hazardous materials response team and that one or more spill response kits would be available on-site. In the event of a large incident involving hazardous materials, backup support would be provided by the SBCFD which has a hazmat response unit capable of handling any incident at the proposed Calico site. The SBCFD Hazmat unit is located at Station #322 in Adelanto, about one hour away.

Staff has reviewed the response times for fire, HazMat release, rescue, and EMS and has discussed the issues with the SBCFD. Upon further in-depth review of the need for emergency response to the Calico facility and the capabilities of the SBCFD, staff has determined that, given the remote location of the Calico facility, and the extremely large amount of hydrogen gas that will be used and stored at this facility, the proposed Calico solar project will have a direct and cumulative impact on the SBCFD. This matter is discussed more fully below and mitigation is proposed.

In addition to construction and operations worker safety issues, the potential exists for exposure to contaminated soil during site preparation. A Phase I Environmental Site Assessment (ESA), dated November 14, 2008, was prepared by URS in accordance with the American Society for Testing and Materials Standard Practice E 1527-05 for ESAs. The ESA did not identify any "Recognized Environmental Conditions." That is, there was no evidence or record of any use, spillage, or disposal of hazardous substances on the site, nor was there any other environmental concern that would require remedial action. To address the unlikely possibility that soil contamination would be encountered during construction of the Calico Solar Project, proposed Conditions of Certification **WASTE-1** and **WASTE-2** require a registered professional engineer or geologist to be

available during soil excavation and grading to ensure proper handling and disposal of contaminated soil. See the staff assessment section on **Waste Management** for a more detailed analysis of this topic.

C.15.4.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

Method and Threshold for Determining Significance

Two issues are assessed in **Worker Safety and Fire Protection:**

1. The potential for impacts on the safety of workers during demolition, construction, operations, and closure and decommissioning activities; and
2. Fire prevention/protection, emergency medical response, and hazardous materials spill response during demolition, construction, operations, and closure and decommissioning activities.

Worker safety is essentially a LORS compliance matter and if all LORS are followed, workers will be adequately protected. Thus, the standard for staff's review and determination of significant impacts on worker health is whether the applicant has demonstrated adequate knowledge of and commitment to implementation of all pertinent and relevant Cal-OSHA standards.

Staff reviews and evaluates the on-site fire-fighting systems proposed by the applicant, as well as the time needed for off-site local fire departments to respond to a fire, medical, or hazardous material emergency at the Calico Solar Project site. If on-site systems do not follow established codes and industry standards, staff recommends additional measures. Staff reviews local fire department capabilities and response times. If Staff determines that the presence of the power plant would cause a significant impact on a local fire department. Staff will recommend that the applicant mitigate this impact.

DIRECT/INDIRECT IMPACTS AND MITIGATION

Proposed Project Worker Safety

Industrial environments are potentially dangerous during both construction and operation. Workers at the proposed project will be exposed to loud noises, moving equipment, trenches, and confined space entry and egress. Workers may sustain falls, trips, burns, lacerations, and other injuries. They may be exposed to falling equipment or structures, chemical spills, hazardous waste, fires, explosions, and electrical sparks or electrocution. It is important that the Calico Solar Project has well-defined policies and procedures, training, and hazard recognition and control to minimize these hazards and protect workers. If the facility complies with all LORS, workers will be adequately protected from health and safety hazards.

A Safety and Health Program will be prepared by the applicant to minimize worker hazards during construction and operation of the project. "Safety and Health Program," for staff, refers to measures that will be taken to ensure compliance with the applicable LORS during the construction and operation of the project.

Construction Safety and Health Program

The Calico Solar Project includes the construction and operation of a Stirling solar power plant. The project will present construction risks and operational risks to workers typical of other solar power projects. In addition the facility will pose risks associated with use of hydrogen as a working gas. The risk to workers is minimized through onsite generation (which reduces storage of hydrogen) and through rigorous safety management practices required by applicable LORS.

Construction safety orders are published at Title 8 of the California Code of Regulations, section 1502 et seq. These requirements are promulgated by Cal/OSHA and apply to the construction phase of the project. The construction safety and health program will include the following:

- Construction injury and illness prevention program (8 CCR § 1509);
- Construction fire prevention plan (8 CCR § 1920);
- Personal protective equipment program (8 CCR §§ 1514–1522); and
- Emergency action program and plan.

Additional programs under General Industry Safety Orders (8 CCR §§ 3200 to 6184), Electrical Safety Orders (8 CCR §§2299 to 2974) and Unfired Pressure Vessel Safety Orders (8 CCR §§ 450 to 544) will include:

- Electrical safety program;
- Motor vehicle and heavy equipment safety program;
- Forklift operation program;
- Excavation/trenching program;
- Fall protection program;
- Scaffolding/ladder safety program;
- Articulating boom platforms program;
- Crane and material handling program;
- Housekeeping and material handling and storage program;
- Respiratory protection program;
- Employee exposure monitoring program;
- Hand and portable power tool safety program;
- Hearing conservation program;
- Back injury prevention program;
- Hazard communication program;
- Heat and cold stress monitoring and control program;
- Pressure vessel and pipeline safety program;
- Hazardous waste program;

- Hot work safety program;
- Permit-required confined space entry program; and
- Demolition procedure (if applicable).

The AFC includes adequate outlines for each of the above programs (SES 2008a). Prior to the project's start of construction, detailed programs and plans will be provided pursuant to Condition of Certification **WORKER SAFETY-1**.

Operations and Maintenance Safety and Health Program

Prior to the start-up of the Calico Solar Project, an operations and maintenance safety and health program will be prepared. This program will include the following programs and plans:

- Injury and illness prevention program (8 CCR § 3203);
- Fire prevention program (8 CCR § 3221);
- Personal protective equipment program (8 CCR §§ 3401 to 3411); and
- Emergency action plan (8 CCR § 3220).

In addition, the requirements under General Industry Safety Orders (8 CCR §§ 3200 to 6184), Electrical Safety Orders (8 CCR §§2299 to 2974) and Unfired Pressure Vessel Safety Orders (8 CCR §§ 450 to 544) will apply to this project. Written safety programs for the Calico Solar Project, which the applicant will develop, will ensure compliance with those requirements.

The AFC includes adequate outlines for an injury and illness prevention program, an emergency action plan, a fire prevention program, and a personal protective equipment program (SES 2008a). Prior to operation of the Calico Solar Project, all detailed programs and plans will be provided pursuant to Condition of Certification **WORKER SAFETY-2**.

Safety and Health Program Elements

As mentioned above, the applicant provided the proposed outlines for both a Construction Safety and Health Program and an Operations Safety and Health Program. The measures in these plans are derived from applicable sections of state and federal law. The major items required in both Safety and Health Programs are as follows:

Injury and Illness Prevention Program (IIPP)

The IIPP will include the following components (BSE2007a, section 5.16.4.4):

- Identify persons with the authority and responsibility for implementing the program;
- Establish the safety and health policy of the plan;
- Define work rules and safe work practices for construction activities;
- Establish a system for ensuring that employees comply with safe and healthy work practices;
- Establish a system to facilitate employer-employee communication;

- Develop procedures for identifying and evaluating workplace hazards and establish necessary program(s);
- Establish methods for correcting unhealthy/unsafe conditions in a timely manner;
- Determine and establish training and instruction requirements and programs;
- Specify safety procedures; and
- Provide training and instruction.

Fire Prevention Plan

The California Code of Regulations requires an operations fire prevention plan (8 CCR § 3221). The AFC outlines a proposed fire prevention plan that is acceptable to staff (SOLAR 2007a, section 6.18.3.1). The plan will include the following:

- Determine general program requirements;
- Determine fire hazard inventory, including ignition sources and mitigation;
- Develop good housekeeping practices and proper materials storage;
- Establish employee alarms and/or communication system(s);
- Provide portable fire extinguishers at appropriate site locations;
- Locate fixed firefighting equipment in suitable areas;
- Specify fire control requirements and procedures;
- Establish proper flammable and combustible liquid storage facilities;
- Identify the location and use of flammable and combustible liquids;
- Provide proper dispensing and determine disposal requirements for flammable liquids;
- Establish and determine training and instruction requirements and programs; and
- Identify contacts for information on plan contents.

Staff proposes that the applicant submit a final fire prevention plan to the California Energy Commission compliance project manager (CPM) for review and approval and to the SBCFD for review and comment to satisfy proposed conditions of certification **WORKER SAFETY-1** and **-2**.

Personal Protective Equipment Program

California regulations require personal protective equipment (PPE) and first aid supplies whenever hazards in the environment, or from chemicals or mechanical irritants, could cause injury or impair bodily function through absorption, inhalation, or physical contact (8 CCR sections 3380 to 3400). The Calico Solar Project operational environment will require PPE.

All safety equipment must meet National Institute of Safety and Health (NIOSH) or American National Standards Institute (ANSI) standards and will carry markings, numbers, or certificates of approval. Respirators must meet NIOSH and Cal/OSHA

standards. Each employee must be provided with the following information about protective clothing and equipment:

- Proper use, maintenance, and storage;
- When protective clothing and equipment are used;
- Benefits and limitations; and
- When and how protective clothing and equipment are replaced.

The PPE program ensures that employers comply with applicable requirements for PPE and provides employees with the information and training necessary to protect them from potential hazards in the workplace, and will be required as per proposed Conditions of Certification **WORKER SAFETY-1** and **-2**.

Emergency Action Plan

California regulations require an emergency action plan (8 CCR § 3220). The AFC contains a satisfactory outline for an emergency action plan (SES 2008a).

The outline lists the following features:

- Establishes emergency procedures for the protection of personnel, equipment, the environment, and materials;
- Identifies fire and emergency reporting procedures;
- Determines response actions for accidents involving personnel and/or property;
- Develops response and reporting requirements for bomb threats;
- Specifies site assembly and emergency evacuation route procedures;
- Defines natural disaster responses (for example, earthquakes, high winds, and flooding);
- Establishes reporting and notification procedures for emergencies (including on-site, off-site, local authorities, and/or state jurisdictions);
- Determines alarm and communication systems needed for specific operations;
- Includes a spill response, prevention, and countermeasure (SPCC) plan;
- Identifies emergency personnel (response team) responsibilities and notification roster;
- Specifies emergency response equipment and strategic locations; and
- Establishes and determines training and instruction requirements and programs.

An emergency action plan is required by applicable LORS and Staff's proposed Conditions of Certification **WORKER SAFETY-1** and **-2**

Written Safety Program

In addition to the specific plans listed above, additional LORS called "safe work practices" apply to the project. Both the construction and operations safety programs will address

safe work practices in a variety of programs. The components of these programs include, but are not limited to, the programs found under the heading “Construction Safety and Health Program” in this staff assessment.

In addition, the project owner would be required to provide personnel protective equipment and exposure monitoring for workers involved in activities where contaminated soil and/or contaminated groundwater exist, per staff’s proposed Conditions of Certification **WORKER SAFETY-1** and**-2**.

These proposed conditions of certification ensure that workers are properly protected from any hazardous wastes at the site.

Safety Training Programs

Employees will be trained in the safe work practices described in the above-referenced safety programs.

Additional Safety Issues

This solar power plant will present a unique work environment that includes a solar field located in the high desert. The area under the SunCatchers must be kept free from weeds and thus herbicides will be applied as necessary. Exposure to workers via inhalation and ingestion of dusts containing herbicides poses a health risk. Finally, workers will inspect the SunCatcher arrays for hydrogen leaks and broken apparatus on a frequent basis by driving up and down dirt paths between the rows of solar catchers. Cleaning the SunCatchers will also be conducted on a routine schedule. All these activities will take place year-round and especially during the summer months of peak solar power generation, when outside ambient temperatures routinely reach 115 °F and above.

The applicant has indicated that workers will be adequately trained and protected, but has not included specific precautions against heat stress and exposure to herbicides. Therefore, to ensure that workers are indeed protected, staff has proposed additional requirements to proposed Conditions of Certification **WORKER SAFETY-1** and **-2**. These requirements consist of the following provisions:

- A worker heat stress protection plan that implements and expands on existing Cal OSHA regulations (8 CCR 3395) requiring heat illness prevention; and
- The development and implementation of Best Management Practices (BMP) for the storage and application of herbicides used to control weeds beneath and around the solar array.
- All herbicide applications would comply with the Record of Decision for BLM’s Programmatic EIS for Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States (see http://www.blm.gov/wo/st/en/prog/more/veg_eis.html). Only herbicides approved in that ROD would be used, and all herbicide use would comply with the use protocol, consultation requirements, monitoring requirements, and standard operating procedures listed therein.

Staff believes that effective implementation of a Heat Stress Protection Plan will mitigate the potential for significant risks to workers from heat during both construction and operations. A BMP requiring proper herbicide storage and application will mitigate

potential risks to workers from exposure to herbicides and reduce the chance that herbicides will contaminate either surface water or groundwater. Staff suggests that a BMP follow either the guidelines established by the U.S. EPA (EPA 1993), or more recent guidelines established by the State of California or U.S. EPA.

Additional Mitigation Measures

Protecting construction workers from injury and disease is one of the greatest challenges today in occupational safety and health. The following facts are reported by NIOSH:

- More than 7 million persons work in the construction industry, representing 6% of the labor force. Approximately 1.5 million of these workers are self-employed;
- Of approximately 600,000 construction companies, 90% employ fewer than 20 workers. Few have formal safety and health programs;
- From 1980-1993, an average of 1,079 construction workers were killed on the job each year, with more fatal injuries than any other industry;
- Falls caused 3,859 construction worker fatalities, or 25.6% of the total, between 1980 and 1993;
- 15% of workers' compensation costs are spent on construction-related injuries;
- Ensuring safety and health in construction is a complex task involving short-term work sites, changing hazards, and multiple operations and crews working in close proximity to one another;
- In 1990, Congress directed NIOSH to conduct research and training to reduce diseases and injury among construction workers in the United States. Under this mandate, NIOSH funds both intramural and extramural research projects.

The hazards associated with the construction industry are well documented. These hazards increase in complexity in the multi-employer worksites typical of large, complex industrial projects like gas-fired power plants. In order to reduce and/or eliminate these hazards, it has become standard industry practice to hire a construction safety supervisor to ensure a safe and healthful environment for all workers. This has been evident in the audits of power plants recently conducted by the staff. The Federal Occupational Safety and Health Administration (OSHA) has also entered into strategic alliances with several professional and trade organizations to promote and recognize safety professionals trained as construction safety supervisors, construction health and safety officers, and other professional designations. The goal of these partnerships is to encourage construction subcontractors to improve their safety and health performance; to assist them in striving to eliminate the four major construction hazards (falls, electrical, caught in/between, and struck-by hazards) that account for the majority of fatalities and injuries in this industry and have been the focus of targeted OSHA inspections; to prevent serious accidents in the construction industry through implementation of enhanced safety and health programs and increased employee training; and to recognize subcontractors that have exemplary safety and health programs.

There are no OSHA or Cal-OSHA requirements that an employer hire or provide for a construction safety officer. OSHA and Cal-OSHA regulations do, however, require that safety be provided by an employer and the term “Competent Person” appears in many

OSHA and Cal-OSHA standards, documents, and directives. A “Competent Person” is defined by OSHA as an individual who, by way of training and/or experience, is knowledgeable of standards, is capable of identifying workplace hazards relating to the specific operations, is designated by the employer, and has authority to take appropriate action. Therefore, in order to meet the intent of the OSHA standard to provide for a safe workplace during power plant construction, staff proposes Condition of Certification **WORKER SAFETY-3,** which would require the applicant/project owner to designate and provide for a project site construction safety supervisor.

As discussed above, the hazards associated with the construction industry are well documented. These hazards increase in complexity in the multi-employer worksites typical of large, complex industrial projects like power plants.

Accidents, fires, and a worker death have occurred at Energy Commission-certified power plants in the recent past because of both the failure to recognize and control safety hazards and the inability to adequately monitor compliance with occupational safety and health regulations. Safety problems have been documented by Energy Commission staff in safety audits, conducted in 2005, at several power plants under construction. The findings of the audit include, but are not limited to, safety oversights like:

- Lack of posted confined-space warning placards/signs;
- Confusing and/or inadequate electrical and machinery lockout/tagout permitting and procedures;
- Confusing and/or inappropriate procedures for handing over lockout/tagout and confined space permits from the construction team to the commissioning team, and then to operations;
- Dangerous placement of hydraulic elevated platforms under one another;
- Inappropriate placement of fire extinguishers near hotwork;
- Dangerous placement of numerous power cords in standing water on the site, increasing the risk of electrocution;
- Inappropriate and unsecure placement of above-ground natural gas pipelines inside the facility, but too close to the perimeter fence; and
- Lack of adequate employee or contractor written training programs that address the proper procedures to follow in the event of the discovery of suspicious packages or objects either onsite or offsite.

In order to reduce and/or eliminate these hazards, it is necessary for the Energy Commission to require a professional Safety Monitor on-site to track compliance with Cal-OSHA regulations and periodically audit safety compliance during construction, commissioning, and the hand-over to the operations staff. These requirements are outlined in Condition of Certification **WORKER SAFETY-4**. A Safety Monitor, hired by the project owner but reporting to the Chief Building Official (CBO) and the Compliance Project Manager (CPM), will serve as an extra set of eyes to ensure that safety procedures and practices are fully implemented during construction at all power plants certified by the Energy Commission. During audits conducted by staff, most site safety professionals welcomed the audit team and actively engaged them in questions about

the team's findings and recommendations. These safety professionals recognized that safety requires continuous vigilance and that the presence of an independent audit team provides a "fresh perspective" of the site.

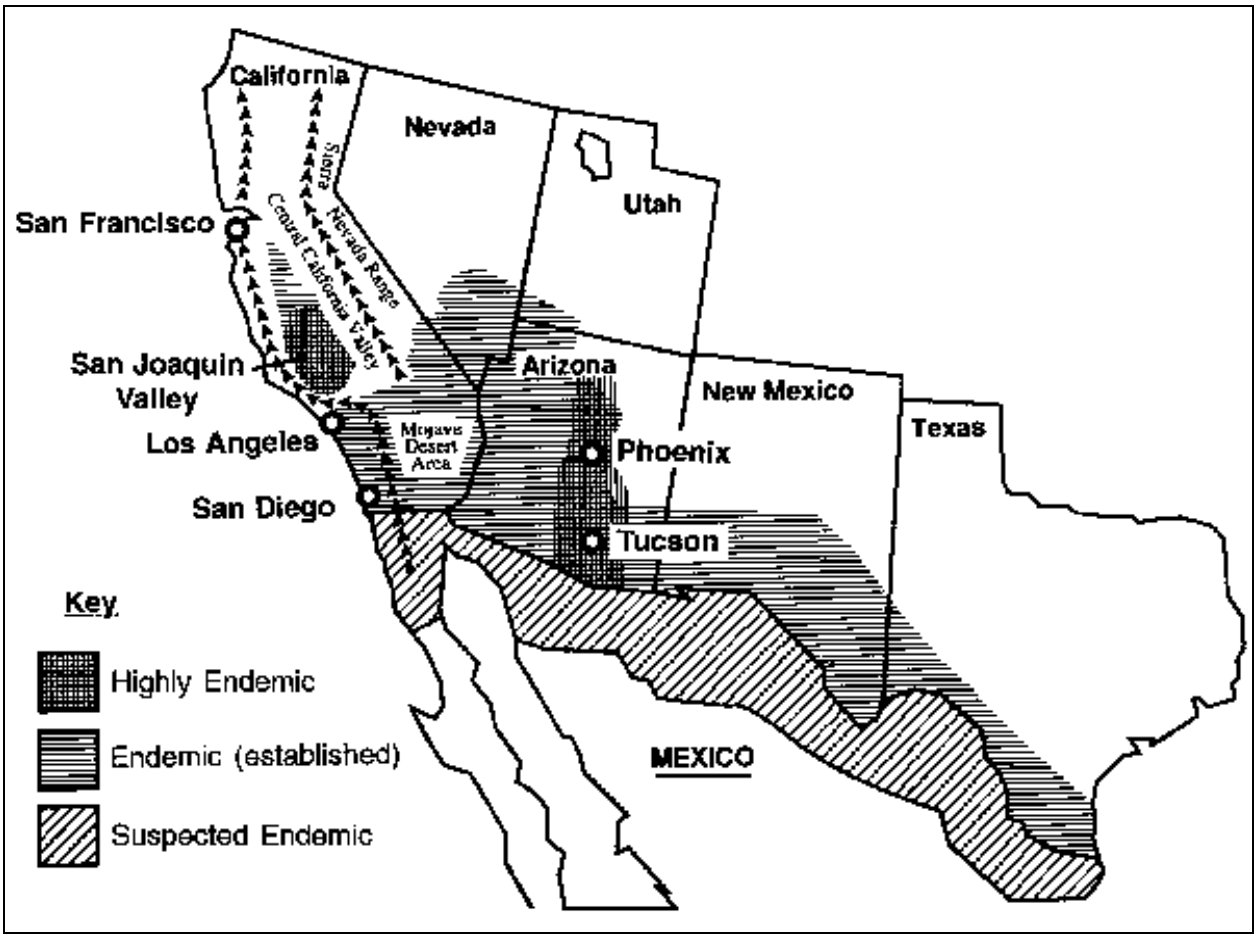
Valley Fever (Coccidioidomycosis)

Coccidioidomycosis or "Valley Fever" (VF) is primarily encountered in southwestern states, particularly in Arizona and California. It is caused by inhaling the spores of the fungus *Coccidioides immitis*, which are released from the soil during soil disturbance (e.g., during construction activities) or wind erosion. The disease usually affects the lungs and can have potentially severe consequences, especially in at-risk individuals such as the elderly, pregnant women, and people with compromised immune systems. Trenching, excavation, and construction workers are often the most exposed population. Treatment usually includes rest and antifungal medications. No effective vaccine currently exists for Valley Fever. VF is endemic to the San Joaquin Valley in California, which presumably gave this disease its common name. Kern County, located at the southern end of San Joaquin valley, is where valley fever occurs most frequently (Valley Fever Vaccine Project of the Americas 2010; KCDPH 2008). While the area where the highest rate was found is that part of Kern County to the west of the Sierra Nevada-Tehachapi Range, the eastern side along with the Mojave Desert in San Bernardino County experiences high rates as well. The proposed Calico project will be in located in the Mojave Desert part of San Bernardino County and thus staff feels that the following discussion which focuses on Kern County is applicable to this project site as well.

In 1991, 1,200 cases of VF were reported to the California Department of Health Services (CDHS) compared with an annual average of 428 cases per year for the period of 1981 to 1990. In 1992, 4,516 cases were reported in California and 4,137 cases in 1993. Seventy percent of VF cases were reported from Kern County (CDC 1994; Flaherman 2007; CDHS 2010).

A 2004 CDC report found that the number of reported cases of coccidioidomycosis in the US increased by 32% during 2003-2004, with the majority of these cases occurring in California and Arizona. The report attributed these increases to changes in land use, demographics, and climate in endemic areas, although certain cases might be attributable to increased physician awareness and testing (CDC 2006). According to the CDC Morbidity and Mortality Weekly Report of February 2009, incidences of valley fever have increased steadily in Arizona and California in the past decade. Cases of coccidioidomycosis averaged about 2.5 per 100,000 population annually from 1995 to 2000 and increased to 8.0 per 100,000 population between 2000 and 2006 (incidence rates tripled). In 2007 there was a slight drop in cases, but the rate was still the highest it has been since 1995. The report identified Kern County as having the highest incidence rates (150.0 cases per 100,000 population), and non-Hispanic blacks having the highest hospitalization rates (7.5 per 100,000 population). In addition, between the years 2000 and 2006, the number of valley fever related hospitalizations climbed from 1.8 to 4.3 per 100,000 population (611 cases in 2000 to 1,587 cases in 2006) and then decreased to 1,368 cases in 2007 (3.6 per 100,000 population). Overall in California, during 2000-2007, a total of 752 (8.7%) of the 8,657 persons hospitalized for coccidioidomycosis died (CDC 2009).

Worker Safety and Fire Protection Figure 1
Geographic Distribution of Coccidioidomycosis

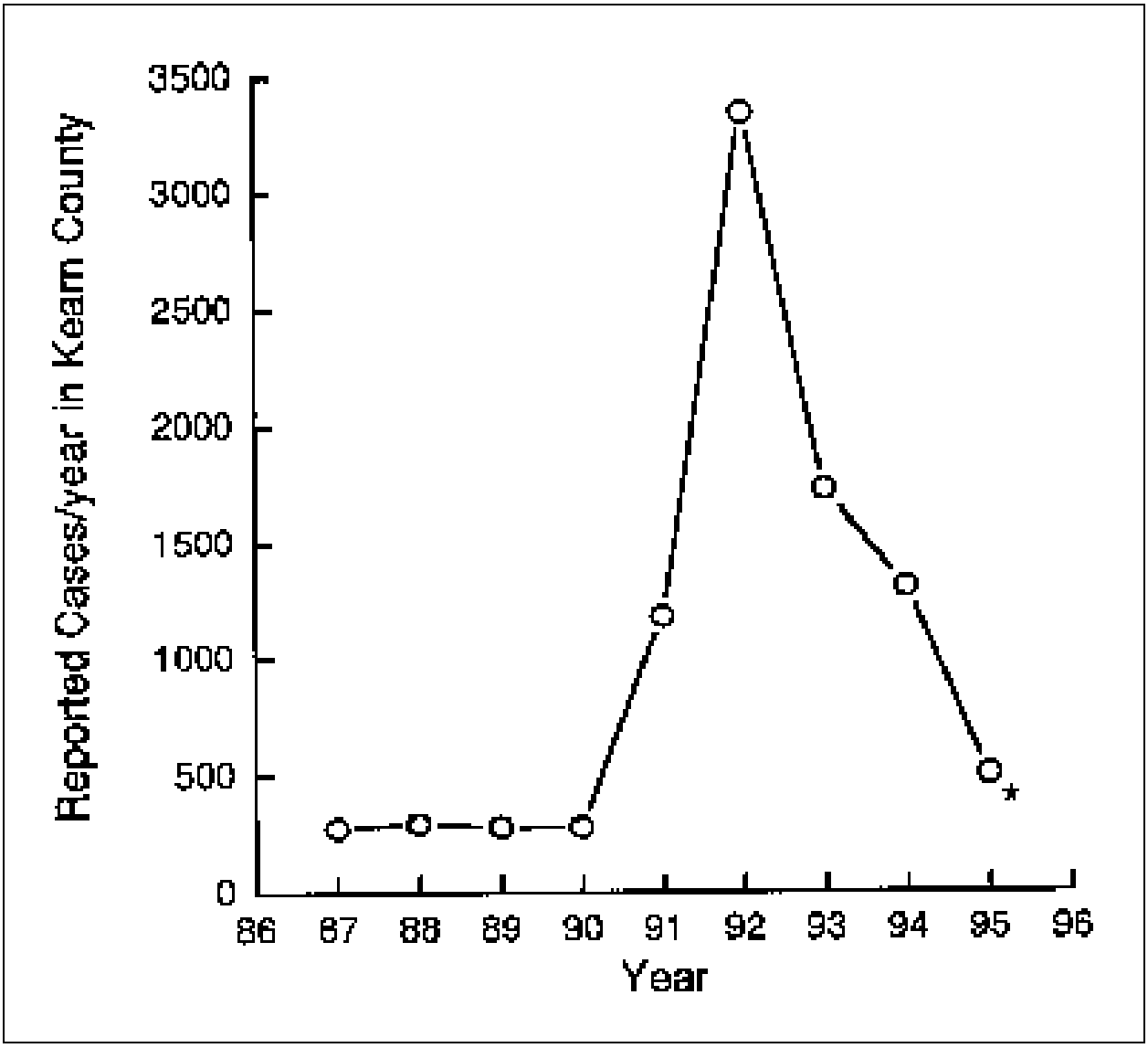


Source: CDC 2006, Figure 2

A 2007 study published in the Emerging Infectious Diseases journal of the Center for Disease Control and Prevention (CDC), found the frequency of hospitalization for coccidioidomycosis in the entire state of California to be 3.7 per 100,000 residents per year for the period between 1997 and 2002 (see **Worker Safety and Fire Protection Table 2**). There were 417 deaths from VF in California in those years, resulting in a mortality rate of 2.1 per 1 million California residents annually. The data shows that Kern County had the highest total number and highest frequency of hospitalizations (Flaherman 2007).

A 1996 paper that tried to explain the sudden increase in Coccidioidomycosis cases that began in the early 1990s found that the San Joaquin Valley in California has the largest population of *C. immitis*, which is found to be distributed unevenly in the soil and seems to be concentrated around animal burrows and ancient Indian burial sites. It is usually found 4 to 12 inches below the surface of the soil (CDC 2006). The paper also reported that incidences of coccidioidomycosis vary with the seasons; with highest rates in late summer and early fall when the soil is dry and the crops are harvested. Dust storms are frequently followed by outbreaks of coccidioidomycosis (CDC 2006). A modeling attempt to establish the relationship between fluctuations in VF incidence rates and weather conditions in Kern County found that there is only a weak connection between weather and VF cases (weather patterns correlate with up to 4% of outbreaks). The study.

Worker Safety and Fire Protection Figure 2
Number of Coccidioidomycosis Cases Identified by Serologic Testing at the Kern County Public Health Laboratory between 1986 and 1996



Source: CDC 2006, Figure 4

concluded that the factors that cause fluctuations in VF cases are not weather-related but rather biological and anthropogenic (i.e. human activities, primarily construction on previously undisturbed soil) (Talamantes 2007).

Data from the Kern County Department of Public Health (KCDPH) on the period between 1995 and 2008 shows that VF cases increased in Kern County during the early 1990's, decreased during the late 1990's, increased again between 2000 and 2005, and have been declining slightly in the last several years. The majority of VF cases are recorded in the Bakersfield area where 50% to 70% of all Kern County VF cases occur. Delano, Lamont, and Taft have the next highest recorded incidences of VF. With the exception of the year 2004 when 26 cases of VF were reported in the Ridgecrest area, less than 15 cases have been recorded annually in Ridgecrest since 1995, representing less than 5% of the total cases recorded in Kern County (KCDPH 2008).

Worker Safety and Fire Protection Table 2
Hospitalizations for Coccidioidomycosis, California, 1997–2002

Category	Total Hospitalizations	Total Person-Years ($\times 10^6$)	Frequency of Hospitalization[1]	Frequency of Hospitalization for Coccidioidal Meningitis[1]
Total	7,457	203.0	3.67	0.657
Year				
1997	1,269	32.5	3.90	0.706
1998	1,144	32.9	3.50	0.706
1999	1,167	33.4	3.5	0.61
2000	1,100	34.0	3.23	0.62
2001	1,291	34.7	3.7	0.58
2002	1,486	35.3	4.2	0.71
Highest Incidence Counties				
Kern	1,700	3.97	42.8	
Tulare	479	2.21	21.7	
Kings	133	0.77	17.4	
SLO	170	1.48	11.5	

Notes:
1 - Per 100,000 residents per year
Source: Flaherman 2007

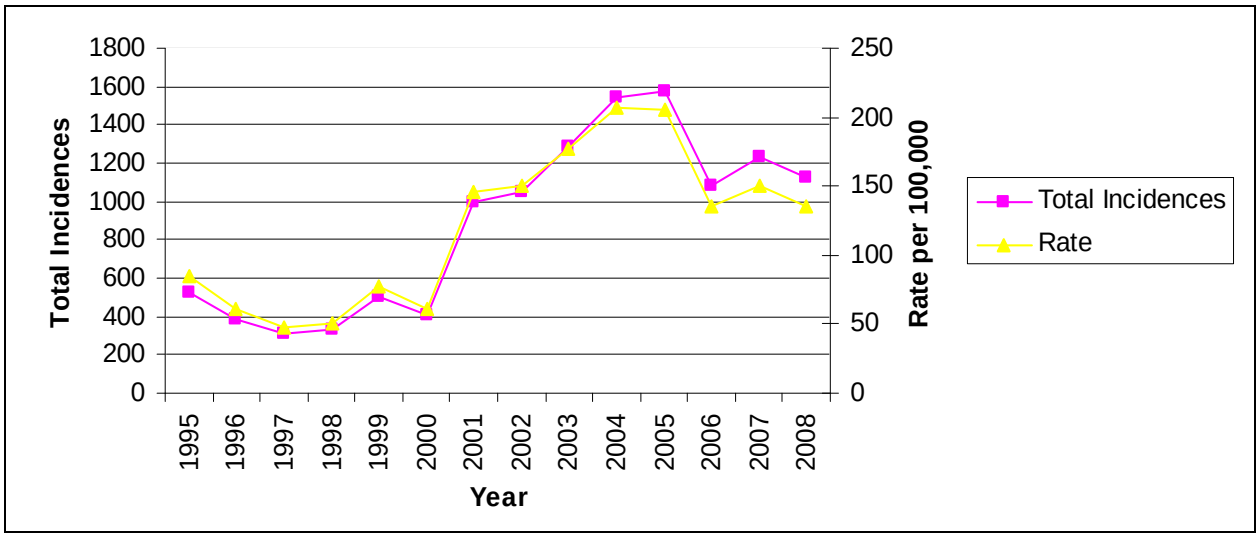
Worker Safety and Fire Protection Table 3
Valley Fever Cases In Kern County 1995-2008

	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
Cases	523	382	307	328	504	406	994	1,055	1,281	1,540	1,578	1,081	1,229	1,128
Rate per 100,000	84.5	61	48.3	51.2	77.1	61	145.7	150.9	177.7	206.9	204.9	135.2	150.4	135.1

Source: KCDPH 2008, Table 1

During correspondence with Dr. Michael MacLean of the Kings County Health Department, he noted that according to his experience and of those who study VF, it is very hard to find the fungus in soil that was previously farmed and irrigated, which greatly reduces the risk of infection resulting from disturbance of farmed lands. This does not apply to previously undisturbed lands where excavation, grading, and construction may correlate with increases in VF cases. Dr. MacLean feels that with the current state of knowledge, we can only speculate on the causes and trends influencing VF cases and he does not feel that construction activities are necessarily the cause of VF outbreaks (KCEHS 2009).

Worker Safety and Fire Protection Figure 3
VF Cases in Kern County 1995-2008



Source: KCDPH 2008, Figure 2

Valley Fever is spread through the air. If soil containing the fungus is disturbed by construction, natural disasters, or wind, the fungal spores become airborne and are thus available for inhalation by people. The disease is not spread from person to person. Occupational or recreational exposure to dust is an important consideration. Agricultural workers, construction workers, or others (such as archeologists) who dig in the soil in the disease-endemic area of the Central Valley are at the highest risk for the disease (CDC 2006; CDHS 2010). The risk for disseminated coccidioidomycosis is much higher among some ethnic groups, particularly African-Americans and Filipinos. In these ethnic groups, the risk for disseminated coccidioidomycosis is tenfold that of the general population (CDC 2006).

A VF website claims that most cases of valley fever do not require treatment. Even though 30% to 60% of the population in areas where the disease is highly prevalent — such as in the southern San Joaquin Valley of California — have positive skin tests indicating previous infection, most were unaware of ever having had valley fever (“Valley Fever Vaccine Project of the Americas” 2010).

Worker Safety and Fire Protection Table 4
Disease Forms

Categories	Notes
Asymptomatic	• Occurs in about 50% of patients
Acute Symptomatic	• Pulmonary syndrome that combines cough, chest pain, shortness of breath, fever, and fatigue. • Diffuse pneumonia affects immunosuppressed individuals • Skin manifestations include fine papular rash, erythema nodosum, and erythema multiforme • Occasional migratory arthralgias and fever

Categories	Notes
Chronic Pulmonary	• Affects between 5% to 10% of infected individuals • Usually presents as pulmonary nodules or peripheral thin-walled cavities
Extrapulmonary/Disseminated Varieties	
Chronic skin disease	• Keratotic and verrucose ulcers or subcutaneous fluctuant abscesses
Joints / Bones	• Severe synovitis and effusion that may affect knees, wrists, feet, ankles, and/or pelvis • Lytic lesions commonly affecting the axial skeleton
Meningeal Disease	• The most feared complication • Presenting with classic meningeal symptoms and signs • Hydrocephalus is a frequent complication
Others	• May affect virtually any organ, including thyroid, GI tract, adrenal glands, genitourinary tract, pericardium, peritoneum

Given the available scientific and medical literature on Valley Fever, it is difficult for staff to assess the potential for VF to impact workers during construction and operation of the proposed Calico Solar Project with a reasonable degree of certainty. However, the higher number of cases reported in Kern County indicates that the project site, in adjacent San Bernardino County, may have an elevated risk for exposure. To minimize potential exposure of workers and also the public to coccidioidomycosis during soil excavation and grading, extensive wetting of the soil prior to and during construction activities should be employed and dust masks should be worn at certain times during these activities. The dust (PM10) control measures found in the **Air Quality** section of this SSA should be strictly adhered to in order to adequately reduce the risk of contracting VF to less than significant. Towards that, staff proposes Condition of Certification **WORKER SAFETY-8** which would require that the dust control measures found in proposed Conditions **AQ-SC3** and **AQ-SC4** be supplemented with additional requirements including implementing methods equivalent to the requirements of Rule 402 of the Kern County Air Pollution Control District (as amended Nov. 3, 2004).

Proposed Project Fire Hazards

During construction and operation of the proposed Calico Solar Project there is the potential for small fires, major structural fires and wildland fires. Electrical sparks, combustion of fuel oil, natural gas, hydraulic fluid, mineral oil, insulating fluid at the project power plant switchyard or flammable liquids, explosions, and overheated equipment, may cause small fires. Major structural fires in areas without automatic fire detection and suppression systems are unlikely at most power plants. Fires and explosions of natural gas or other flammable gasses or liquids are also rare at most power plants. Compliance with all LORS is usually adequate to ensure protection from all fire hazards associated with the project. Wildland fires that would use local vegetation as its fuel and could have potential effects on workers and project facilities are not usually

expected to be caused by a project. If wildland fires are external to the Calico Solar Project boundaries, they would not be the responsibility of the project owner to suppress. However, the applicant plans to remove all vegetation in the vicinity of the solar power towers, substation and administration areas, and to cut and maintain vegetation in the solar field. The access road along the perimeter fence lines will also serve as a fire break.

Staff reviewed the information provided in the AFC to determine if available fire protection services and equipment would adequately protect workers, and to further determine the project's impact on fire protection services in the area. This is an unusual project in that large amounts of highly flammable hydrogen gas will be produced, used, and stored at the project site. Hydrogen gas burns with a very hot flame and thus heat radiation from an on-site fire may impact the area outside the project boundaries. The project will rely on both onsite fire protection systems and local fire protection services. The on-site fire protection system provides the first line of defense for small fires. In the event of a major fire, fire support services, including trained firefighters and equipment for a sustained response, would be provided by the San Bernardino Fire Department (SBCFD).

Construction

During construction, portable fire extinguishers will be located and maintained throughout the site; safety procedures and training will also be implemented (SES 2008a).

Operation

The information in the AFC indicates that the project intends to meet the fire protection and suppression requirements of the California Fire Code, all applicable recommended NFPA standards (including Standard 850, which addresses fire protection at electric generating plants), and all Cal-OSHA requirements. Fire suppression elements in the proposed plant will include both fixed and portable fire extinguishing systems.

The fire protection system would be designed to protect personnel and limit property loss and plant downtime in the event of a fire. The primary source of fire protection water would be 175,000 gallons stored in the demineralized water storage. A diesel fire water pump will increase the water pressure to the level required to serve all fire fighting systems. The applicant has proposed a number of protective measures that would help reduce the potential for harm to plant personnel and damage to facilities. These include removal of all vegetation in the vicinity of the substation and administration areas. The access road along the perimeter fence lines would also serve as a fire break.

In addition to the fixed fire protection system, smoke detectors, flame detectors, high-temperature detectors, appropriate class of service portable extinguishers, and fire hydrants must be located throughout the facility at code-approved intervals. These systems are standard requirements of the fire code, NFPA and staff has determined that they will ensure adequate fire protection.

The applicant would be required by conditions of certification **WORKER SAFETY-1** and**-2** to provide a final fire protection and prevention program to both staff and the

SBCFD prior to the construction and operation of the project in order to confirm the adequacy of proposed fire protection measures.

The proposed Calico project has identified only one access gate and one access road coming from I-40. Staff finds that a second gate and road is necessary to ensure fire department access for emergency response. If the main access road or gate is blocked for whatever reason, the Calico project would essentially be isolated. If a concurrent event, such as a fire, hazardous material spill, confined space or trench rescue, or medical emergency, were to occur at the Calico power plant, the SBCFD would not be able to respond in a timely manner. Lives would be put at risk. This access gate and road can be restricted to emergency use only and, if possible, the gate should be equipped with a system for remote keyless entry. Therefore, in order to comply with the requirements of LORS and with the SBCFD, staff proposes a Condition of Certification **WORKER SAFETY-6** that would require the project owner to identify and provide a second access gate at the site and a second road to the site for emergency vehicles and equip this secondary gate with either a remote system or a keypad for fire department personnel to open the gate. The precise location of this second access road would be determined after taking into consideration biological and cultural concerns.

According to NFPA standards and UFC requirements, the fire protection system must have fire detection sensors and monitoring equipment that would trigger alarms and automatically actuate the suppression systems. Staff has determined that these systems will ensure adequate fire protection.

The applicant would be required by Conditions of Certification **WORKER SAFETY-1** and **-2** to provide the final construction and operations Fire Protection and Prevention Programs to staff and to the SBCFD prior to construction and operation of the project to confirm the adequacy of the proposed fire protection measures.

Since the publication of the Staff Assessment/Draft Environmental Impact Statement (SA/DEIS), staff has continued to review the emergency response needs of the proposed solar power plants which would be located in San Bernardino, Riverside, and Kern Counties. Staff has also met with the SBCFD and the Riverside County Fire Department. Staff has considered the position of the SBCFD and all relevant information as well as past experience at existing solar power plants that are similar to but smaller than the proposed Calico project in terms of power generated and size of the solar area. These existing solar power plants use a heat transfer fluid other than the proposed hydrogen gas for the Calico project; nevertheless, both heat transfer fluids are highly flammable, and when burning, generate intense heat. Staff believes that comparisons about safety and risk can me made between the existing power plants and the proposed Calico project.

Staff reviewed the records of emergency responses of the San Bernardino County Fire Department (SBCFD) to the only three thermal solar power plants in the state. These are the Solar Electric Generating Station (SEGS) 1 & 2 (43.8 megawatts - MW) in Daggett (operating since 1984), SEGS 3-7 (150 MW) at Kramer Junction (1989), and SEGS 8 & 9 (160 MW) at Harper Dry Lake (1989). Staff also reviewed what records were immediately available at the three solar plants. All sources stated that their records were incomplete and not comprehensive. Staff believes that the past experience at the

three active thermal solar power plants in San Bernardino County is applicable to all similar solar power plants being proposed regardless of the county involved. Staff offers this background information as a basis to support staff's contention that no matter where the solar plant is located, the local fire department having jurisdiction will have to provide some level of services in five areas of response:

1. Plan reviews, inspections, and permitting
2. Fire response
3. Hazmat spill response
4. Rescue
5. Emergency Medical Services (EMS)

Past Fire Department Responses at Existing Thermal Solar Power Plants

Three types (as categorized by the SBCFD) of fire department responses to the solar power plants were surveyed (CEC 21010r; SBCFD 2010a, d, e, f, and h):

1. Plan reviews
2. Hazmat and fire inspections
3. Emergency Response including medical, fire, rescue, and hazardous materials incidents

Regarding visits to the sites for plan review during the years the plant was operating, the SBCFD made four visits to the Kramer Junction facility and one visit to the Harper Lake facility.

Regarding site visits for inspections, reviews, enforcement activities, and follow ups, the SBCFD made 10 inspections to Daggett since 2008, totaling 24 hours of time, 48 visits to Kramer Junction since 2003, totaling 128 hours of time, and 29 visits to Harper Lake since 2004, totaling 105 hours of time.

Including emergency response for fire, rescue, medical and hazardous materials incidents, approximately 30 incidents occurred since 1998 that required the SBCFD (and other fire stations through mutual aid agreements) to respond to the three solar power plant sites. These included fires, fire alarm activations, injuries, medical emergencies, hazardous materials spills, complaints/calls from the public, and false alarms. However, the available records did not include documentation of a major fire at the SEGS 8 facility (80 MW) in January of 1990 that required a large part of the regional resources from four different fire districts including the San Bernardino County, Edwards Air Force Base, California Department of Forestry (now Cal Fire), and the Kern County fire departments (SBCFD 2010c). This fire is the largest incident that has occurred at a solar thermal plant in California and demonstrates the magnitude of fire department resources that can be required to respond to a fire at a large thermal solar facility. The inability to quickly control this event had ramifications for the project's finances and reliability - it took almost two years to bring the SEGS 8 heaters back on-line and supplement the solar field generation.

According to the Daggett solar plant records, only three incidents in the life of the plant required emergency services (CEC 2010p):

1. Feb 25, 1999: A heat transfer fluid (HTF) fire occurred in the HTF tanks. This was a major fire and the fire department allowed the fire to burn itself out over 2 days. There were no injuries, but extensive damage occurred.
2. Feb 28, 2000: An employee had a suspected heart attack (which was actually caused by drinking a whole bottle of hot sauce), and an ambulance responded from the fire department.
3. May 15-17, 2010: An HTF spill of about 60 gallons occurred in the solar field. The facility personnel cleaned it up on May 15 and reported it to San Bernardino County on the next business day, May 17. When receiving the report the dispatcher misunderstood the report and sent out a 911 call indicating a spill is in progress. The whole fire department showed up on scene.

According to information received from the Kramer Junction plant, the following incidents required fire department response:

1. August 2002 for an unknown HazMat incident.
2. In 2007 when 30,000 gallons of HTF spilled.
3. In Feb. 2009 when a flex hose failure and a vapor cloud ignited. According to Kramer Junction plant officials, the fire department was not needed as plant staff had the situation under control. A concerned citizen had made a 911 call.

According to information received from the Harper Lake plant, only the January 1990 fire required fire department response.

To summarize, relying on sparse data received from the SBCFD for only the past 10 years and not including the 1990 SEGS 8 fire, the department responded to about 30 incidents and emergencies at the three solar locations, including two fires and two hazardous materials spills. During the same period, the SBCFD conducted approximately 90 inspections and visits for enforcement actions/plan reviews, totaling about 260 hours of personnel time. The incident rate, therefore, for all three power plants would be 30 in 12 years or 2.5 emergency calls per year or 0.83 emergencies per solar plant per year. [Note: Staff wishes to caution that since the number of thermal solar power plants is so few and their operating history so short, any conclusion as to accident incident rates is weak from a statistical perspective. Simply put, the data set is not robust enough to draw any definitive conclusions about the safety records of these solar power plants. Nevertheless, this information and the incidence rate of emergency response are provided to give a general idea of the past need for emergency response.)

Analysis of Impacts Due to the Calico Solar Project

The proposed power plant would be located in an area that is currently served by the SBCFD and thus all emergency response services to the site would be under the jurisdiction of the SBCFD. Even though the nearest fire station is that of Newberry Springs Fire Department, staff believes that the proper jurisdiction is the SBCFD and that all emergency services must be coordinated with San Bernardino County.

The proposed Calico solar power plant is very different from the industrial, commercial, and residential development in the San Bernardino County desert region. It is also different from the existing solar plants located at Harper Lake and Kramer Junction in

San Bernardino County. The Calico solar power plant would be larger in scale than the existing solar power plants (approximately 6,215 acres) and will have a huge amount of highly flammable hydrogen gas as the heat transfer fluid in use at elevated pressure (up to 20,000,000 cubic feet or approximately 116,000 lbs at 580 psi). The amount of highly flammable material stored and used on-site, combined with the rather remote location and the potential for escalation of a small fire into a large conflagration enveloping the entire site and perhaps even beyond due to thermal radiation effects from a hydrogen fire, presents an emergency response challenge for the SBCFD.

Presently, the SBCFD is not able to respond to fire, hazmat, rescue, and EMS emergencies in a timely manner at the Calico power plant. The standard fire department response for a fire or for a hazmat spill includes response of six engines and at least three fire fighters on each engine. To fight a fire inside a structure, the SBCFD must adhere to standard operating procedures and Cal-OSHA regulations that require "two in, two out". Thus, a response of three fire fighters from one station would not allow fire fighters to attack a fire from within a structure or conduct a rescue. Confined space and collapsed trench rescues would also be problematic with only three fire fighters. Therefore, no matter what size the fire or how many workers are initially in need of rescue, the SBCFD would dispatch engines from at least three fire stations so that at a minimum, nine firefighters are sent to the scene but the SBCFD would eventually dispatch a total of 9 engines. Even if mutual aid was available and an "automatic aid" pact was in effect, which is not currently, the SBCFD would still have to respond to an emergency at the Calico site because it is the Authority Having Jurisdiction.

Additionally, it is very important to note that the Calico power plant (along with the other solar power plants) will be located in an extremely harsh desert environment. The ability of a fire fighter to perform duties while wearing a turn-out coat, heavy boots, and a respirator (self contained breathing apparatus) is limited under the best of circumstances. If conducting a rescue or fighting a fire that necessitates use of a respirator, the high-temperatures of the desert, often exceed 115° F, severely limits a fire fighter's ability to perform the duties to 15 minutes at a time. This severe time restriction necessitates the mobilization of more fire fighters to respond to the emergency.

Staff has considered the position of the SBCFD and all relevant information as well as past experience at existing solar power plants that are similar to the proposed project. The proposed facility would be located in an area that is currently served by the SBCFD. The inspection, fire, hazmat, rescue, and EMS needs at the proposed Calico power plant are real and would pose significant added demands on local fire protection services. In addition, staff finds that the SBCFD's Hazmat Response Team cannot respond to hazardous materials incidents at the proposed facility with an adequate response time due to the great distant involved. Staff has determined that the Calico power plant would cause a significant direct and cumulative impact on the local fire department. Staff also noted that the potential exists for a fire to escalate not only within the solar power plant but beyond the power plant into a wild land fire. Even though this is a desert environment, the scrub grasses and native plants are concentrated enough to sustain a wild fire. Thus, a fire at the Calico site would place traffic on the nearby Interstate-40 (I-40) at risk and possibly require more fire equipment and personnel to respond. The home located south of I-40 is at a lower risk due to the interstate providing

a fire break. Note that the site is 6,215 acres, with a 30-mile fence line. The personnel and equipment needed to survey and control this large perimeter to ensure a fire does not spread from the site is considerable.

The County of San Bernardino is faced with a multitude of renewable energy projects proposed or considered for formal proposal. Some are wind and photovoltaic while others are solar thermal projects that utilize large volumes of flammable heat transfer fluid (Abengoa Mojave Solar) or large volumes of highly flammable and explosive hydrogen gas such as the Calico project. All the projects are remotely located in the Mojave Desert in the largest county in the United States. Response times for rescue, EMS, and fire suppression to these remote sites would be very high even for a rural environment. The SBCFD has begun planning to provide services for these projects and has produced a map showing the potential locations of renewal energy facilities, existing fire stations, and possible new fire stations (SBCFD 2010b). Staff must take into consideration the direct individual project impacts to fire protection services as well as the cumulative impacts. Staff also notes that budgetary shortfalls that impact fire services are common today and San Bernardino County is no exception. These fiscal impacts limit the SBCFD from providing the services that are needed to fulfill its mission.

Mitigation

Regarding potential mitigation, staff is proposing Condition of Certification **WORKER SAFETY- 7** that requires the Calico power plant to either negotiate a mitigation fee agreement with the SBCFD to fund fire department capital improvements and make an annual payment to mitigate the project's individual impacts and its share of a cumulative impact on the fire department.

Alternatively, staff suggests that Calico form and join a solar industry group or association that will provide membership to all solar power plants located within the jurisdiction of the SBCFD or even across the greater California desert region to negotiate payment for their project-related shares of capital and operating costs to build and operate new fire protection/response infrastructure for these large, remote industrial facilities The group could ensure appropriate equipment and personnel as mitigation of project-related impacts on fire protection services on the most cost-effective basis. Staff proposes that the project owner be given this option to form and join a power generation industry association or group so that this association or group could negotiate payment for their project-related shares of SBCFD capital and operating costs. The association would be able to raise funds, negotiate payment for emergency response services with the SBCFD, and audit county and district fire department protection/emergency response expenditures to ensure that funds go towards associated emergency response needs. And, most importantly, develop and implement an appropriate fee structure for its members based on project characteristics (e.g., size, technology, chemical usage, or project location relative to emergency response infrastructure) and the re-payment of funds provided by its initial members upon the joining of new members. Staff urges the applicant and the Committee to consider this approach.

Also, staff has developed an Emergency Response Matrix that staff, the fire departments, and project owners may use to assess the level of emergency response need (CEC 2010q). This analytical tool has a weighting scheme for the various categories of fire department response and utilizes professional judgment in the

assignment of the “score” to the categories. Staff has tested this methodology on existing and planned solar power plants and finds it to be useful but cautions against using it as the sole basis for determining need or for allocating financial responsibility for direct individual or cumulative impacts. Otherwise, staff recommends that the applicants prepare an independent fire needs assessment and a fire risk assessment for this and each solar project to best assess impacts on emergency response services in the jurisdictions.

The SBCFD has modified this tool to address its own needs and has used it in part to arrive at its estimated allocated costs for the Calico power plant (SBCFD 2010b). The amount of money proposed in the Condition of Certification is based on a thorough review by SBCFD of its present capabilities and needs. Staff met with representatives of the SBCFD and expert consultants hired by the fire department to develop costs for capital improvements and annual operating and maintenance (O&M) and allocate these costs to new projects proposed for construction in the County. The SBCFD estimates that it needs three additional fire stations and upgrades to three existing fire stations in order to provide adequate service and emergency response to 14 proposed renewable energy projects in the county. Using the analysis prepared by Hoffmann and Associates (SBCFD 2010b), the county determined that a total capital cost of $12,539,000 would be needed. Using the Emergency Response Matrix and weighting it for the size in MW of each energy project and applying an “allocation factor” of 29% for solar project based upon fire department service calls to various land use categories in 2009, the SBCFD determined that the Calico project should be allocated $1,187,000 of these costs for capital improvements. As for annual O&M and staffing costs, $1,095,000 (SBCFD 2010b) was found by the above method to be the appropriate allocation for the Calico project.

Staff has reviewed the cost figures and map of proposed renewable energy facilities and fire stations prepared by the county and finds the costs to construct or expand fire stations to be reasonable and consistent with the costs per square foot for building a fire station, for a new fire engine, and for fire fighter salaries and benefits. However, staff has no position on the SBCFD’s allocation of costs to the Calico project. The methodology used by the SBCFD is objective and well documented. Staff has no experience with the operating or accident history of the Stirling SunCatchers. Staff agrees with the analysis provided by the SBCFD and in the absence of any other analysis regarding impacts on fire protection services used it as a basis for staff’s proposed mitigation.

Emergency Medical Services Response

Staff has determined that the potential for both work-related and non-work related heart attacks exists at power plants. In fact, staff’s research on the frequency of EMS response to power plants shows that many of the responses for cardiac emergencies involved non-work related incidences, including visitors. The need for prompt response within a few minutes is well documented in the medical literature. Staff believes that the quickest medical intervention can only be achieved with the use of an on-site defibrillator often called an Automatic External Defibrillator or AED; the response from an off-site provider would take longer regardless of the provider location. This fact is also well documented and serves as the basis for many private and public locations including airports, factories, and government buildings, all of which maintain on-site

cardiac defibrillation devices. Therefore, staff concludes that with the availability of modern cost-effective AED devices, it is proper in a power plant environment to maintain these devices on-site in order to treat cardiac arrhythmias resulting from industrial accidents or other non-work related causes. Therefore, an additional condition of certification, **WORKER SAFETY-5**, is proposed so that a portable AED will be located on site, and workers trained in its use.

C.15.4.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) LEVEL OF SIGNIFICANCE

Cumulative impacts and mitigation

Staff reviewed the construction and operation of the Calico Solar Project could have on the fire and other emergency service capabilities of the SBCFD. Staff concludes that the Calico Solar Project would have a cumulative significant impact on existing local services.

Noteworthy public benefits

Staff has not identified any noteworthy public benefits associated with the proposed project's potential use of fire and emergency service capabilities of the SBCFD.

C.15.5 REDUCED ACREAGE ALTERNATIVE

The Reduced Acreage alternative would essentially be a 275 MW solar facility located within the central portion of the proposed 850 MW project. It was developed because it could be constructed without the necessity of a new 500 kilovolts (kV) transmission line, and would avoid several other environmental impacts. This alternative's boundaries and the revised locations of the transmission line, substation, laydown, and control facilities are shown in **Alternatives Figure 1**.

C.15.5.1 SETTING AND EXISTING CONDITIONS

The general setting and existing conditions would remain as described in C.15.4.1 although the land requirements would be proportionately reduced to reflect the smaller project size. Locations of laydown areas may also vary.

C.15.5.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

The types of construction and operational impacts of this alternative would be the same as those of the proposed project, as described in Section C.15.4.2. The proposed project impacts are found to be less than significant with the incorporation of conditions of certification, and impacts of this alternative would be even smaller due to the smaller extent of construction disturbance and the smaller number of SunCatchers of the alternative. Construction and operation risk to workers due to the use of hydrogen and use of herbicides will be reduced because of the reduced number of SunCatchers.

C.15.5.3 CEQA LEVEL OF SIGNIFICANCE

Like the proposed project, the construction and operation of the reduced acreage alternative would be in compliance with all applicable LORS for both long-term and short-term project impacts in the area of worker safety and fire protection with the adoption of the proposed conditions of certification. The mitigation that would be proposed for the reduced acreage alternative would be the same as that proposed for the proposed project (staff recommended conditions **WORKER SAFETY-1** to **WORKER SAFETY-6**).

C.15.6 AVOIDANCE OF DONATED AND ACQUIRED LANDS ALTERNATIVE

The analysis of the Donated and Acquired Lands Alternative has been moved to Section B.2 (Alternatives) of this document.

C.15.7 NO PROJECT/NO ACTION ALTERNATIVES

There are three No Project / No Action Alternatives evaluated as follows:

No Project / No Action Alternative #1: No Action on the Calico Solar Project application and on California Desert Conservation Area (CDCA) land use plan amendment

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM and BLM would not amend the CDCA Plan. As a result, no solar energy project would be constructed on the project site and BLM would continue to manage the site consistent with the existing land use designation in the CDCA Land Use Plan of 1980, as amended.

Staff concludes that if the applicant for the proposed Calico Solar Project provides project construction safety and health and project operations and maintenance safety and health programs, as required by proposed **Worker Safety** conditions of certification; the Calico Solar Project would incorporate sufficient measures to ensure adequate levels of industrial safety and comply with applicable LORS. As worker safety and fire protection is a LORS-conformity requirement, the No Project/No Action alternative consideration is not applicable to the worker safety topic and thus there would be no significant impacts on the local fire department.

No Project / No Action Alternative #2: No Action on the Calico Solar Project and amend the CDCA land use plan to make the area available for future solar development

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM and BLM would amend the CDCA Land Use Plan of 1980, as amended, to allow for other solar projects on the site. As a result, it is possible that another solar energy project could be constructed on the project site.

Staff concludes that if the applicant for the proposed Calico Solar Project provides project construction safety and health and project operations and maintenance safety

and health programs, as required by proposed **Worker Safety** conditions of certification; the Calico Solar Project would incorporate sufficient measures to ensure adequate levels of industrial safety and comply with applicable LORS. As worker safety and fire protection is a LORS-conformity requirement, the No Project/No Action alternative consideration is not applicable to the worker safety topic and thus there would continue to a significant impact on the local fire department if another solar project were built at this site.

No Project / No Action Alternative #3: No Action on the Calico Solar Project application and amend the CDCA land use plan to make the area unavailable for future solar development

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM and the BLM would amend the CDCA Plan to make the proposed site unavailable for future solar development. As a result, no solar energy project would be constructed on the project site and BLM would continue to manage the site consistent with the existing land use designation in the CDCA Land Use Plan of 1980, as amended.

Staff concludes that if the applicant for the proposed Calico Solar Project provides project construction safety and health and project operations and maintenance safety and health programs, as required by proposed **Worker Safety** conditions of certification; the Calico Solar Project would incorporate sufficient measures to ensure adequate levels of industrial safety and comply with applicable LORS. As worker safety and fire protection is a LORS-conformity requirement, the No Project/No Action alternative consideration is not applicable to the worker safety topic and thus there would be no significant impacts on the local fire department.

C.15.8 PROJECT-RELATED FUTURE ACTIONS – WORKER SAFETY AND FIRE PROTECTION

This section examines the potential impacts of future transmission line construction, line removal, substation expansion, and other upgrades that may be required by Southern California Edison Company (SCE) as a result of the Calico Solar Project. The SCE upgrades are a reasonably foreseeable event if the Calico Solar Project is approved and constructed as proposed.

The SCE project will be fully evaluated in a future Environmental Impact Report/ Environmental Impact Statement (EIR/EIS) prepared by the BLM and the California Public Utilities Commission. Because no application has yet been submitted and the SCE project is still in the planning stages, the level of impact analysis presented is based on available information. The purpose of this analysis is to inform the Energy Commission and BLM, interested parties, and the general public of the potential environmental and public health effects that may result from other actions related to the Calico Solar Project.

The project components and construction activities associated with these future actions are described in detail in Section B.3 of this Supplemental Staff Assessment. This analysis examines the construction and operational impacts of two upgrade scenarios

- The **275 MW Early Interconnection Option** would include upgrades to the existing SCE system that would result in 275 MW of additional latent system capacity. Under the 275 MW Early Interconnection option, Pisgah Substation would be expanded adjacent to the existing substation, one to two new 220 kV structures would be constructed to support the gen-tie from the Calico Solar Project into Pisgah Substation, and new telecommunication facilities would be installed within existing SCE ROWs.
- The **850 MW Full Build-Out Option** would include replacement of a 67-mile 220 kV SCE transmission line with a new 500 kV line, expansion of the Pisgah Substation at a new location and other telecommunication upgrades to allow for additional transmission system capacity to support the operation of the full Calico Solar Project.

C.15.8.1 ENVIRONMENTAL SETTING

The environmental setting described herein incorporates both the 275 MW Early Interconnection and the 850 MW Full Build-Out options. The setting for the 275 MW Early Interconnection upgrades at the Pisgah Substation and along the telecomm corridors is included within the larger setting for the project area under the 850 MW Full Build-Out option, which also includes the Lugo-Pisgah transmission corridor.

Fire support services along the SCE transmission upgrades would be under the jurisdiction of the San Bernardino County Fire Department (SBCFD) and fire suppression support nearby to the Pisgah Substation and the Calico Solar Project would come from the Newberry Springs Fire Department and the SBCFD. The San Bernardino County Fire Department has an estimated response time of 40 minutes and will provide primary fire protection, fire fighting, and emergency response services (SES 2008a). SBCFD North Desert Division Harvard Station #46 (39059 Kathy Lane in Newberry Springs) is 30 miles from the ending point of the transmission upgrades site near Pisgah Substation, and would be the first responder to that area. Station #46 has a one ICS Type 1 structure engine, one ICS Type 4 Brush Patrol unit with 4-wheel drive, and one Type 3 Brush Fire Engine. It has three staff on duty at all times (a captain, and two paid-call firefighters) (SBCFD 2010). The SBCFD North Desert Division also has eight stations in the area between the Lucerne Valley and I-15 in Hesperia that would be able to provide fire suppression along the southwestern portion of the line in the more developed area near Lugo Substation.

In San Bernardino County, hazardous material incidents are handled by the San Bernardino County Interagency Response Team, which is composed of hazardous materials specialists from San Bernardino County and participating city fire agencies. There are over 100 members (15 Registered Environmental Health Specialists and the rest, firefighters), and the organization is a full Level A response team capable of handling all types of chemical, biological, radiological, and nuclear responses. Hazardous materials service for the County is headquartered in the City of San Bernardino and the County is divided into three geographic regions for the purpose of deploying hazmat trained fire service personnel and vehicles and equipment in close proximity to any incident (SBCFD 2010).

C.15.8.2 ENVIRONMENTAL IMPACTS

Industrial environments are potentially dangerous during both construction and operation. The construction activities would include the pre-permitting surveying of the transmission line route and substation expansion areas, the actual construction activities, and the existing line decommissioning activities. For construction of the transmission line towers, accidents can occur during transport of equipment and supplies to the project area, during drilling of the transmission tower foundations, during welding and construction of the tower components, and during overhead work activities on the tower structures. The conductor stringing activities also requires transport of equipment to the project area, vehicle and equipment usage, overhead work activities, and work activities in the vicinity of live high voltage electric lines. The line decommissioning activities would have similar potential for accidents, due to transport of equipment and supplies to the project area, equipment usage, vehicle travel, overhead work activities, and work activities in the vicinity of live high voltage electric lines.

Workers at the project site would be exposed to loud noises, moving equipment, trenches, and confined space entry and egress. Workers may sustain falls, trips, burns, lacerations, and other injuries. They may be exposed to falling equipment or structures, chemical spills, hazardous waste, fires, explosions, and electrical sparks or electrocution. Worker safety impacts can also be caused by vehicle accidents associated with operation of heavy equipment or travel accidents to and from or within the project area. It is important that SCE has well-defined policies and procedures, training, and hazard recognition and control to minimize these hazards and protect workers. If the project complies with all LORS, workers would be adequately protected from health and safety hazards.

During construction and operation of the upgrades there is the potential for both small fires and major structural fires. Electrical sparks; combustion of fuel oil, hydraulic fluid, mineral oil, insulating fluid at the substations, or flammable liquids; explosions; and overheated equipment may cause small fires. Major structural fires are unlikely along transmission lines and at substations. Fires and explosions of flammable gasses or liquids are rare. Compliance with all LORS would be adequate to ensure protection from all fire hazards.

The project would rely on both on-site fire protection systems and local fire protection services. The on-site fire protection system would provide the first line of defense for small fires. In the event of a major fire, fire support services, including trained firefighters and equipment for a sustained response, would be provided by the SBCFD.

C.15.8.3 MITIGATION

Calico included the following general recommended mitigation measures for worker safety in Appendix EE of the AFC:

- Adherence to appropriate OSHA safety standards;
- Utilization of applicable permits for all work activities and compliance with permit conditions;
- Preparation and utilization of appropriate traffic control plans;

- Training for all project employees and contractors on job hazards, personnel protective equipment (PPE), and hazard reporting; and
- Preparation of appropriate health and safety plans for each specific work area, monitoring of the implementation of the plan and modification of the plan as necessary based on work conditions and safety performance.

Mitigation similar to the conditions of certification in this section of the SSA that would require SCE to provide a project construction safety and health program and a project operations and maintenance safety and health program are recommended.

To ensure the safety of workers and the public, SCE has stated that safety devices such as traveling grounds, guard structures, and radio-equipped public safety roving vehicles and linemen would be in place prior to the initiation of wire-stringing activities.

In mountainous areas, benching may be required to provide access for footing construction, assembly, erection, and wire-stringing activities during line construction. It would be used minimally to help ensure the safety of personnel during construction activities.

Construction of the project and construction equipment may impede emergency access through the area. Recommended mitigation would require SCE to coordinate construction schedules, lane closures, and other activities associated with installation of the project with emergency and police services to ensure minimal disruption to response times and access for these services. As is discussed in the **Transportation and Traffic** section of this SSA, because guard structures would be installed over roadway crossings such impacts would also be reduced. Therefore, impacts to emergency access and/or public services and facilities would be less than significant.

C.15.8.4 CONCLUSION

Incorporation of the measures discussed above and the Conditions of Certification included in this section of the SSA would ensure adequate levels of industrial safety and would comply with applicable LORS. This SSA also concludes that the project would not have significant impacts on local emergency and fire protection services.

C.15.9 CUMULATIVE IMPACTS

A project may result in a significant adverse cumulative impact where its effects are cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (California Code Regulation, Title 14, section 15130).

There is the potential for substantial future development in the San Bernardino County area and throughout the southern California desert region. Analysis of cumulative impacts is based on data provided in the following maps and tables (see **Cumulative Scenario**):

- **Cumulative Impacts Figure 1**, Regional Renewable Applications;
- **Cumulative Impacts Figure 2**, Renewable Applications in the Barstow & Needles District Areas;
- **Cumulative Impacts Figure 3**, Newberry Springs/Ludlow Area – Existing and Future/Foreseeable Projects;
- **Cumulative Impacts Table 1**, Renewable Energy Projects in the California Desert District
- **Cumulative Impacts Table 2**, Existing Projects in the Newberry Springs/Ludlow Area; and
- **Cumulative Impacts Table 3**, Future Foreseeable Projects in the Newberry Springs/Ludlow Area.

The analysis in this section first defines the geographic area over which cumulative impacts related to waste management could occur. The cumulative impact analysis itself describes the potential for cumulative impacts to occur as a result of implementation of the Calico Solar Project along with the listed local and regional projects.

Geographic Extent

Cumulative impacts can occur within San Bernardino County if implementation of the Calico Solar Project could combine with those of other local or regional projects. Cumulative impacts could also occur as a result of development of some of the many proposed solar and wind development projects that have been or are expected to be under consideration by the BLM and the Energy Commission in the near future. Many of these projects are located within the California Desert Conservation Area, as well as on BLM land in Nevada and Arizona.

The geographic extent for the analysis of the cumulative impacts associated with the Calico Solar Project includes San Bernardino County. This geographic scope is appropriate because of the solar facilities existing and proposed for San Bernardino County.

Cumulative Impact Analysis

Local and Regional Projects

For this analysis, there are two existing solar projects in the area or region that may require the response from off-site fire departments for fire, HazMat, or EMS emergencies: SEGS at Kramer Junction and at Harper Lake, both located in the far western part of San Bernardino County at least one hour distance from the proposed Calico Solar Project. However, these facilities are not considered by staff to have had an impact on the area or on the existing capabilities of the SBCFD.

Staff has analyzed the potential for Worker Safety and Fire Protection cumulative impacts at many other power plant projects in California. A significant cumulative Worker Safety and Fire Protection impact is defined as the simultaneous need for a fire department to respond to multiple locations such that its resources and those of the mutual aid fire departments (which routinely respond in every-day situations to

emergencies at residences, commercial buildings, and heavy industry) are overwhelmed and cannot effectively respond. Staff believes that cumulative impacts are possible and that despite the many safeguards implemented to both prevent and control fires, HazMat releases, and injuries/accidents at solar power plants, the great distances involved in the desert and the many solar plants that are proposed for San Bernardino County all may cause a significant cumulative impact. Staff therefore believes cumulative impacts on the local fire department would be significant. If staff's proposed mitigation as described in Condition of Certification **WORKER SAFETY-7** is adopted, the impact to the SBCFD would be mitigated to less than significant.

Cumulative Impact Conclusion

Impacts of the Calico Solar Project would combine with impacts of past, present, and reasonably foreseeable projects to result in a contribution to local and regional cumulative impacts related to worker safety and fire protection.

The need for off-site emergency services for the Calico Solar Project would add to the total burden of the San Bernardino County Fire Department due to the number of new solar power plants proposed for this region and the great distances involved in responding to emergencies. Response to an emergency at one solar power plant leaves a station vacant for an extended period of time and thus increases the response time to other locations. Staff finds that this project may have a significant cumulative burden on the SBCFD's ability to respond to a fire or medical emergency and recommends mitigation in the form or proposed Condition of Certification **WORKER SAFETY-7** to reduce this impact to less than significance.

C.15.10 COMPLIANCE WITH LORS

Staff concludes that if the applicant for the proposed Calico Solar Project provides project construction safety and health and project operations and maintenance safety and health programs, as required by proposed **WORKER SAFETY** conditions of certification; the Calico Solar Project would incorporate sufficient measures to ensure adequate levels of industrial safety and comply with applicable LORS. As worker safety is a LORS-conformity requirement, the No Project/No Action alternative consideration is not applicable to the worker safety topic.

C.15.11 NOTEWORTHY PUBLIC BENEFITS

Staff has identified a noteworthy public benefits associated with Worker Safety and Fire Protection. The Calico solar project provision of its share of the needed money to provided the fire department with an increased ability to respond to fires, rescues, hazmat spills, and EMS to the Calico project in a more timely manner would also allow an increased response to other facilities, residents, and the traveling public.

C.15.12 FACILITY CLOSURE

Upon final facility closure, no workers will remain at the site, except for those necessary to maintain security over any remaining hazardous materials until they are removed from the site. During decommissioning, worker safety would be ensured by the same

CAL-OSHA and other regulations requiring safety plans and training for as were needed for construction and operations. A decommissioning Illness and Injury Prevention Plan would be included as part of the decommissioning plan.

Facility fire protection systems will remain functional while hazardous materials remain on site, and as long as feasible into the decommissioning process.

C.15.13 RESPONSE TO PUBLIC AND AGENCY COMMENTS

Staff received comments from the applicant and Mr. Patrick Jackson, an intervener on the project, on the **Worker Safety and Fire Protection** section of the SA/DEIS. Staff's responses to the applicant's April 14, 2010 comments and Mr. Jackson's comments are outlined below and have been incorporated in the appropriate areas of this section. Specific Final Environmental Impact Statement (FIES)-related comments will be responded to by the BLM in the FEIS for this project. In addition, the Energy Commission received a petition to intervene from the Newberry Community Services District on June 28, 2010. Energy Commission staff reviewed the project location with the San Bernardino County Fire Department and confirmed that Sections 4,5,8 and 9 of Township 8 North and Range 5 East are within the San Bernardino County Fire Department according to the maps for fire response areas and fire jurisdictions.

Comment: On page C.15-30 of the SA/DEIS, the applicant proposes the following changes Verification for Condition **WORKER SAFETY-2**.

> "**Verification**: At least thirty (30) days prior to the start of ~~first-fire or commissioning~~ operations, the project owner shall submit to BLM's authorized officer and the CPM for approval a copy of the Project Operations and Maintenance Safety and Health Program.

Response: Staff agrees that the proposed clarification to the verification is appropriate and has made the corresponding change in the analysis.

Comment: The applicant proposes the following changes to Condition of Certification **WORKER SAFETY-4** on page C.15-31 of the SA/DEIS.

> "**WORKER SAFETY-4** The project owner shall make payments to the Chief Building Official (CBO) for the services of a Safety Monitor based upon the market rate and a reasonable fee schedule to be negotiated between the project owner and the CBO. Those services shall be in addition to other work performed by the CBO. The Safety Monitor shall be selected by and report directly to the CBO, and will be responsible for verifying that the Construction Safety Supervisor, as required in Worker Safety 3, implements all appropriate Cal/OSHA and Commission safety requirements. The Safety Monitor shall conduct on-site (including linear facilities) safety inspections at intervals necessary to fulfill those responsibilities."

Response: Staff does not support this proposed change as it reduces flexibility and further does not believe that the market rate is an amount that is standardized and would result in debate post-certification.

Comment: The applicant proposes the following changes to Condition of Certification **WORKER SAFETY-6** on page C.15-32 of the SA/DEIS.

> "The project owner shall either (1) reach an agreement with the San Bernardino County Fire Department regarding funding of its project-related share of capital costs to provide appropriate equipment as mitigation of project-related impacts on fire protection, HazMat, and /or EMS services along with an annual payment to maintain and provide these services, or if no agreement can be reached shall (2) fund its share of the capital costs in the amount of $350,000 ~~plus provide an annual payment of $100,000 to the SBCFD for the support of additional fire department staff commencing with the date of site mobilization and continuing annually thereafter on the anniversary until the final date of power plan decommissioning~~.

Response: WORKER SAFETY-6 has been renumbered and extensively changed in Staff's Supplemental Testimony. This Condition is now **WORKER SAFETY-7**. However, this condition does include an annual mitigation payment to the San Bernardino County Fire Department. Staff contends that ongoing annual mitigation payments to the San Bernardino Fire Department are necessary to mitigate ongoing impacts on local fire protection services over the project life.

Comment: Intervener Patrick C. Jackson commented that the proposed project will have an impact on the safety of the population, employees, and visitors to the privately owned lands adjacent to the project in terms of primary and emergency access. He is especially concerned with the project's hydrogen supply system which may result in serious injuries to nearby population. He is concerned that a hydrogen gas explosion could result in injuries to the population on the adjacent lands and those commuting through the project to access the privately owned lands.

Response: Staff has evaluated the potential consequences of an accidental release of hydrogen at the project site in the Hazardous Materials Management section of this Supplemental Staff Assessment, and has determined that there is no significant risk to nearby populations from a hydrogen explosion. There is no plausible scenario where an unconfined vapor cloud explosion of hydrogen could occur. Staff finds that the use of hydrogen at the proposed facility poses a risk of an on-site fire and the potential for a heat flux impact on off-site areas, including a nearby residence and traffic on I-40, but found no impact on distant surrounding populations. Staff has proposed mitigation to reduce the risk of fire and off-site impacts to below the level of significance (see **HAZ-7** and **WORKER SAFETY-2**) and to ensure adequate response time to control a fire should one occur (see **WORKER SAFETY-7**).

Comment: Newberry Springs Community Service District has petitioned to intervene and to present evidence that they should be the responsible fire district.

Response: Staff believes that the proper jurisdiction is the SBCFD and that all emergency services should be coordinated with San Bernardino County. The applicant appears to agree with staff's opinion in that the Application for Certification (AFC) also states that the SBCFD "will provide primary fire protection, fire fighting, and emergency response services to the Project Site (SES 2008 a, page 5.17-17).

C.15.14 PROPOSED CONDITIONS OF CERTIFICATION

WORKER SAFETY-1 The project owner shall submit to the Compliance Project Manager (CPM) a copy of the Project Construction Safety and Health Program containing the following:

- A Construction Personal Protective Equipment Program;
- A Construction Exposure Monitoring Program;
- A Construction Injury and Illness Prevention Program;
- a Construction heat stress protection plan that implements and expands on existing Cal OSHA regulations as found in 8 CCR 3395;
- A Construction Emergency Action Plan; and
- A Construction Fire Prevention Plan.

The Personal Protective Equipment Program, the Exposure Monitoring, the Personal Protective Equipment Program, the Exposure Monitoring Program, the Heat Stress Protection Plan, and the Injury and Illness Prevention Program shall be submitted to the CPM for review and approval concerning compliance of the program with all applicable safety orders. These plans shall include programs to prevent exposure of workers to the unusual hazard of high intensity reflected light from the solar parabolic mirrors. The Construction Emergency Action Plan and the Fire Prevention Plan shall be submitted to the San Bernardino County Fire Department for review and comment prior to submittal to the CPM for approval.

Verification: At least thirty (30) days prior to the start of construction, the project owner shall submit to the CPM for review and approval a copy of the Project Construction Safety and Health Program. The project owner shall provide a copy of a letter to the CPM from the San Bernardino County Fire Department stating the fire department's comments on the Construction Fire Prevention Plan and Emergency Action Plan.

WORKER SAFETY-2 The project owner shall submit to the CPM a copy of the Project Operations and Maintenance Safety and Health Program containing the following:

- An Operation Injury and Illness Prevention Plan;
- an Operation heat stress protection plan that implements and expands on existing Cal OSHA regulations (8 CCR 3395);
- a Best Management Practices (BMP) for the storage and application of herbicides;
- An Emergency Action Plan;
- Hazardous Materials Management Program;
- Fire Prevention Program (8 CCR § 3221); and;
- Personal Protective Equipment Program (8 CCR §§ 3401-3411).

The Operation Injury and Illness Prevention Plan, Emergency Action Plan, the Heat Stress Protection Plan, BMP for Herbicides, and Personal Protective Equipment Program shall be submitted to the CPM for review and approval concerning compliance of the programs with all applicable safety orders. These plans shall include programs to prevent exposure of workers to the unusual hazard of high intensity reflected light from the solar parabolic mirrors. The Fire Prevention Plan and the Emergency Action Plan shall also be submitted to the San Bernardino County Fire Department for review and comment.

Verification: At least thirty (30) days prior to the start of operations, the project owner shall submit to the CPM for approval a copy of the Project Operations and Maintenance Safety and Health Program. The project owner shall provide a copy of a letter to the CPM from the San Bernardino County Fire Department stating the Fire Department's comments on the Operations Fire Prevention Plan and Emergency Action Plan.

WORKER SAFETY-3 The project owner shall provide a site Construction Safety Supervisor (CSS) who, by way of training and/or experience, is knowledgeable of power plant construction activities and relevant laws, ordinances, regulations, and standards, is capable of identifying workplace hazards relating to the construction activities, and has authority to take appropriate action to assure compliance and mitigate hazards. The CSS shall:

- Have overall authority for coordination and implementation of all occupational safety and health practices, policies, and programs;
- Assure that the safety program for the project complies with Cal/OSHA and federal regulations related to power plant projects;
- Assure that all construction and commissioning workers and supervisors receive adequate safety training;
- Complete accident and safety-related incident investigations, emergency response reports for injuries, and inform the CPM of safety-related incidents; and
- Assure that all the plans identified in Worker Safety 1 and 2 are implemented.

Verification: At least thirty (30) days prior to the start of site mobilization, the project owner shall submit to BLM's authorized officer and the CPM the name and contact information for the Construction Safety Supervisor (CSS). The contact information of any replacement (CSS) shall be submitted to the CPM within one business day.

The CSS shall submit in the Annual Compliance Report documentation of monthly safety inspection reports to include:

- Record of all employees trained for that month (all records shall be kept on site for the duration of the project);
- Summary report of safety management actions and safety-related incidents that occurred during the month;

- Report of any continuing or unresolved situations and incidents that may pose danger to life or health; and
- Report of accidents and injuries that occurred during the month.

WORKER SAFETY-4 The project owner shall make payments to the Chief Building Official (CBO) for the services of a Safety Monitor based upon a reasonable fee schedule to be negotiated between the project owner and the CBO. Those services shall be in addition to other work performed by the CBO. The Safety Monitor shall be selected by and report directly to the CBO, and will be responsible for verifying that the Construction Safety Supervisor, as required in Worker Safety 3, implements all appropriate Cal/OSHA and Commission safety requirements. The Safety Monitor shall conduct on-site (including linear facilities) safety inspections at intervals necessary to fulfill those responsibilities.

Verification: At least thirty (30) days prior to the start of construction, the project owner shall provide proof of its agreement to fund the Safety Monitor services to BLM's authorized officer and the CPM for review and approval.

WORKER SAFETY-5 The project owner shall ensure that a portable automatic external defibrillator (AED) is located on site during construction and operations and shall implement a program to ensure that workers are properly trained in its use and that the equipment is properly maintained and functioning at all times. During construction and commissioning, the following persons shall be trained in its use and shall be on-site whenever the workers that they supervise are on-site: the Construction Project Manager or delegate, the Construction Safety Supervisor or delegate, and all shift foremen. During operations, all power plant employees shall be trained in its use. The training program shall be submitted to BLM's authorized officer and the CPM for review and approval.

Verification: At least thirty (30) days prior to the start of site mobilization the project owner shall submit to BLM's authorized officer and the CPM proof that a portable AED exists on site and a copy of the training and maintenance program for review and approval.

WORKER SAFETY-6 The project owner shall:

a. Provide a second access gate for emergency personnel to enter the site. This secondary access gate shall be at least one-quarter mile from the main gate.

b. Provide a second access road that comes to the site. This road shall be at a minimum an all-weather gravel road, at least 20 feet wide, and with culverts to direct flow under the road at any wash the road may cross.

c. Maintain the main access road and the second road and provide a plan for implementation.

Plans for the secondary access gate, the method of gate operation, gravel road, and to maintain the roads shall be submitted to the San Bernardino County Fire Department for review and comment and to the CPM for review and approval.

Verification: At least thirty (30) days prior to the start of site mobilization, the project owner shall submit to the San Bernardino County Fire Department and the CPM preliminary plans showing the location of a second access gate to the site, a description of how the gate will be opened by the fire department, and a description and map showing the location, dimensions, and composition of the main road, and the gravel road to the second gate. At least thirty (30) days prior to the start of site mobilization, the project owner shall submit final plans plus the road maintenance plan to the CPM review and approval. The final plan submittal shall also include a letter containing comments from the San Bernardino County Fire Department or a statement that no comments were received.

WORKER SAFETY-7 The project owner shall either:

(1) Reach an agreement, either individually or in conjunction with a power generation industry association or group that negotiates on behalf of its members, with the San Bernardino County Fire Department (SBCFD) regarding funding of its project-related share of capital and operating costs to build and operate new fire protection/response infrastructure and provide appropriate equipment as mitigation of project-related impacts on fire protection services within the jurisdiction.

or

(2) Shall fund its share of the capital costs in the amount of $1,187,000 and provide an annual payment of $1,095,000 to the SBCFD for the support of new fire department staff and operations and maintenance commencing with the start of construction and continuing annually thereafter on the anniversary until the final date of power plant decommissioning.

Verification: At least thirty (30) days prior to the start of site mobilization, the project owner shall provide to the CPM:

(1) A copy of the individual agreement with the SBCFD or, if the owner joins a power generation industry association, a copy of the bylaws and group's agreement/contract with the SBCFD.

or

(2) Documentation that the its share of the capital cost has been paid to the SBCFD, documentation that the first and subsequent annual payments have been made, and shall also provide evidence in each January Monthly Compliance Report during construction and the Annual Compliance Report during operation that subsequent annual payments have been made.

WORKER SAFETY-8 The project owner shall develop and implement an enhanced Dust Control Plan that includes the requirements described in **AQ-SC3** and additionally requires:

i. site worker use of dust masks (NIOSH N-95 or better) whenever visible dust is present;

ii. implementation of methods equivalent to Rule 402 of the Kern County Air Pollution Control District (as amended Nov. 3, 2004); and

iii. implementation of enhanced dust control methods (increased frequency of watering, use of dust suppression chemicals, etc. consistent with **AQ-SC4**) immediately whenever visible dust comes from or onto the site or when PM10 measurements obtained when implementing ii (above) exceed 50 µg/m^3.

Verification: At least thirty (30) days prior to the commencement of site mobilization, the enhanced Dust control Plan shall be provided to the CPM for review and approval.

C.15.15 CONCLUSIONS

Staff concludes that if the applicant for the proposed Calico Solar Project provides project construction safety and health and project operations and maintenance safety and health programs, as required by conditions of certification **WORKER SAFETY -1** and **-2**, and fulfills the requirements of conditions of certification **WORKER SAFETY-3** through **-8**, Calico Solar would incorporate sufficient measures to ensure adequate levels of industrial safety and comply with applicable LORS. Staff also concludes that the proposed project would have both direct and cumulative significant impacts on local fire protection services but that implementation of proposed Condition of Certification **WORKER SAFETY -7** would reduce those impacts to less than significant.

Staff further concludes that none of the project alternatives would materially or significantly change potential impacts form the project with regard to worker safety or fire protection. None of the alternatives would be preferred to the proposed project or reduce any otherwise significant impacts on worker safety or fire protection.

C.15.16 REFERENCES

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SFCFD 2010 (San Bernardino County Fire Department) – Personal phone communications with Battalion Chief Mike Weis, North Desert Division, January 5, 2010.

SFCFD 2010b (San Bernardino County Fire Department) – Stanley R Hoffman Associates, Estimated Allocation of Fire Facility Cost to Proposed solar Energy Installations, June 30, 2010.

D. ENGINEERING ANALYSIS

D.1 – FACILITY DESIGN

Testimony of Shahab Khoshmashrab

D.1.1 SUMMARY OF CONCLUSIONS

The California Energy Commission staff concludes that the design, construction, and eventual closure of the project and its linear facilities would likely comply with applicable engineering laws, ordinances, regulations and standards. The proposed conditions of certification, below, would ensure compliance with these laws, ordinances, regulations and standards.

Facility Design is not intended to address environmental impacts under the California Environmental Quality Act.

D.1.2 INTRODUCTION

Facility design encompasses the civil, structural, mechanical, and electrical engineering design of the Calico Solar Project. The purpose of this analysis is to:

- Verify that the laws, ordinances, regulations and standards (LORS) that apply to the engineering design and construction of the project have been identified;
- Verify that both the project and its ancillary facilities are sufficiently described, including proposed design criteria and analysis methods, in order to provide reasonable assurance that the project will be designed and constructed in accordance with all applicable engineering LORS, in a manner that also ensures the public health and safety;
- Determine whether special design features should be considered during final design to address conditions unique to the site which could influence public health and safety; and
- Describe the design review and construction inspection process and establish the conditions of certification used to monitor and ensure compliance with the engineering LORS, in addition to any special design requirements.

Subjects discussed in this analysis include:

- Identification of the engineering LORS that apply to facility design;
- Evaluation of the applicant's proposed design criteria, including identification of criteria essential to public health and safety;
- Proposed modifications and additions to the application for certification (AFC) necessary for compliance with applicable engineering LORS; and
- Conditions of certification proposed by staff to ensure that the project will be designed and constructed to ensure public health and safety and comply with all applicable engineering LORS.

D.1.3 METHODOLOGY AND THRESHOLDS FOR DETERMINING ENVIRONMENTAL CONSEQUENCES

Lists of LORS applicable to each engineering discipline (civil, structural, mechanical, and electrical) are described in the AFC (SES Solar One 2008a, Appendices F, K, M, O, P, Q, R). Key LORS are listed in **Facility Design Table 1,** below:

Facility Design Table 1
Key Engineering Laws, Ordinances, Regulations and Standards (LORS)

Applicable LORS	Description
Federal	Title 29 Code of Federal Regulations (CFR), Part 1910, Occupational Safety and Health standards
State	2007 California Building Standards Code (CBSC) (also known as Title 24, California Code of Regulations)
Local	San Bernardino County regulations and ordinances
General	American National Standards Institute (ANSI) American Society of Mechanical Engineers (ASME) American Welding Society (AWS) American Society for Testing and Materials (ASTM)

D.1.4 PROPOSED PROJECT

D.1.4.1 SETTING AND EXISTING CONDITIONS

The Calico Solar Project would be built on an approximately 6,215-acre site located in San Bernardino County, California. The project site was reduced from the originally proposed 8,230-acre site to avoid environmental resources (TS 2010ag). For more information on the site and its related project description, please see the **Project Description** section of this document. Additional engineering design details are contained in the AFC, Appendices F, K, M, O, P, Q, R (SES Solar One 2008a).

D.1.4.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

The purpose of this analysis is to ensure that the project would be built to applicable engineering codes and ensure public health and life safety. This analysis further verifies that applicable engineering LORS have been identified and that the project and its ancillary facilities have been described in adequate detail. It also evaluates the applicant's proposed design criteria, describes the design review and construction inspection process, and establishes conditions of certification that would monitor and ensure compliance with engineering LORS and any other special design requirements. These conditions allow both the California Energy Commission (Energy Commission) compliance project manager (CPM) and the applicant to adopt a compliance monitoring scheme that will verify compliance with these LORS.

SITE PREPARATION AND DEVELOPMENT

Staff has evaluated the proposed design criteria for grading, flood protection, erosion control, site drainage, and site access, in addition to the criteria for designing and

constructing linear support facilities such as natural gas and electric transmission interconnections. The applicant proposes the use of accepted industry standards (see SES Solar One 2008a, Appendices F, K, M, O, P, Q, R, for a representative list of applicable industry standards), design practices, and construction methods in preparing and developing the site. Staff concludes that this project, including its linear facilities, would most likely comply with all applicable site preparation LORS, and proposes conditions of certification (see below and the **Geology and Paleontology** section of this document) to ensure that compliance.

MAJOR STRUCTURES, SYSTEMS, AND EQUIPMENT

Major structures, systems, and equipment are structures and their associated components or equipment that are necessary for power production, costly or time consuming to repair or replace, are used for the storage, containment, or handling of hazardous or toxic materials, or could become potential health and safety hazards if not constructed according to applicable engineering LORS. Major structures and equipment are identified in the proposed Condition of Certification **GEN-2**, below. Typically, **Facility Design Table 2** in Condition of Certification **GEN-2** lists the major structures and equipment identified in the AFC and other project related information available before project licensing; this list is based on the preliminary design of the project. The master drawing and master specifications lists described in Condition of Certification **GEN-2**, however, include the project-related documents based on the project's detailed design and may include additional documents for structures and equipment not identified in **Facility Design Table 2**. (Detailed project design typically occurs after project licensing and is not available at this time.)

The Calico Solar Project shall be designed and constructed to the 2007 California Building Standards Code (CBSC), also known as Title 24, California Code of Regulations, which encompasses the California Building Code (CBC), California Building Standards Administrative Code, California Electrical Code, California Mechanical Code, California Plumbing Code, California Energy Code, California Fire Code, California Code for Building Conservation, California Reference Standards Code, and other applicable codes and standards in effect when the design and construction of the project actually begin. If the initial designs are submitted to the chief building official (CBO) for review and approval after the update to the 2007 CBSC takes effect, the 2007 CBSC provisions shall be replaced with the updated provisions.

Certain structures in a power plant may be required, under the CBC, to undergo dynamic lateral force (structural) analysis; others may be designed using the simpler static analysis procedure. In order to ensure that structures are analyzed according to their appropriate lateral force procedure, staff has included condition of certification **STRUC-1**, below, which, in part, requires the project CBO's review and approval of the owner's proposed lateral force procedures before construction begins.

PROJECT QUALITY PROCEDURES

The project's AFC (SES Solar One 2008a, Appendices F, K, M, O, P, Q, R) describes a quality program intended to inspire confidence that its systems and components will be designed, fabricated, stored, transported, installed, and tested in accordance with all appropriate power plant technical codes and standards. Compliance with design

requirements will be verified through specific inspections and audits. Implementation of this quality assurance/quality control (QA/QC) program will ensure that the Calico Solar Project is actually designed, procured, fabricated, and installed as described in this analysis.

COMPLIANCE MONITORING

Under Section 104.2 of the CBC, the CBO is authorized and directed to enforce all provisions of the CBC. The Energy Commission itself serves as the building official, and has the responsibility to enforce the code, for all of the energy facilities it certifies. In addition, the Energy Commission has the power to interpret the CBC and adopt and enforce both rules and supplemental regulations that clarify application of the CBC's provisions.

The Energy Commission's design review and construction inspection process conforms to CBC requirements and ensures that all facility design conditions of certification are met. As provided by Section 104.2.2 of the CBC, the Energy Commission appoints experts to perform design review and construction inspections and act as delegate CBOs on behalf of the Energy Commission. These delegates typically include the local building official and/or independent consultants hired to provide technical expertise that is not provided by the local official alone. The applicant, through permit fees provided by the CBC, pays the cost of these reviews and inspections. While building permits in addition to Energy Commission certification are not required for this project, the applicant pays in lieu of CBC permit fees to cover the costs of these reviews and inspections.

Engineering and compliance staff will invite San Bernardino County or a third-party engineering consultant to act as CBO for this project. When an entity has been assigned CBO duties, Energy Commission staff will complete a memorandum of understanding (MOU) with that entity to outline both its roles and responsibilities and those of its subcontractors and delegates.

Staff has developed proposed conditions of certification to ensure public health and safety and compliance with engineering design LORS. Some of these conditions address the roles, responsibilities, and qualifications of the engineers who will design and build the proposed project (conditions of certification **GEN-1** through **GEN-8**). These engineers must be registered in California and sign and stamp every submittal of design plans, calculations, and specifications submitted to the CBO. These conditions require that every element of the project's construction (subject to CBO review and approval) be approved by the CBO before it is performed. They also require that qualified special inspectors perform or oversee special inspections required by all applicable LORS.

While the Energy Commission and delegate CBO have the authority to allow some flexibility in scheduling construction activities, these conditions are written so that no element of construction (of permanent facilities subject to CBO review and approval) which could be difficult to reverse or correct can proceed without prior CBO approval. Elements of construction that are not difficult to reverse may proceed without approval of the plans. The applicant bears the responsibility to fully modify construction elements

in order to comply with all design changes resulting from the CBO's subsequent plan review and approval process.

D.1.5 REDUCED ACREAGE ALTERNATIVE

The Facility Design section is not intended to address environmental impacts under either CEQA or NEPA.

D.1.6 AVOIDANCE OF DONATED AND ACQUIRED LANDS ALTERNATIVE

The Facility Design section is not intended to address environmental impacts under either CEQA or NEPA.

D.1.7 NO PROJECT / NO ACTION ALTERATIVE

The Facility Design section is not intended to address environmental impacts under either CEQA or NEPA.

D.1.8 PROJECT-RELATED FUTURE ACTIONS

Proposed upgrades to the Southern California Edison (SCE) transmission system, known as the 275 MW Early Interconnection option and the 850 MW Full Build-Out option are considered to be reasonably foreseeable actions that would be contingent on construction of the proposed Calico Solar Project. The SCE upgrades would not impact the facility design of the proposed Calico Solar Project, and therefore, no additional analysis is required.

D.1.9 CUMULATIVE IMPACT ANALYSIS

The Facility Design section is not intended to address environmental impacts under either CEQA or NEPA.

D.1.10 COMPLIANCE WITH LORS

No federal, state, or local/county laws, ordinances, regulations, and standards (LORS) apply to the design of this project.

D.1.11 NOTEWORTHY PUBLIC BENEFITS

Staff has not identified any noteworthy public benefits associated with this Facility Design section.

D.1.12 PROPOSED CONDITIONS OF CERTIFICATION/MITIGATION MEASURES

GEN-1 The project owner shall design, construct, and inspect the project in accordance with the 2007 California Building Standards Code (CBSC), also known as Title 24, California Code of Regulations, which encompasses the California Building Code (CBC), California Building Standards Administrative Code, California Electrical Code, California Mechanical Code, California Plumbing Code, California Energy Code, California Fire Code, California Code for Building Conservation, California Reference Standards Code, and all other applicable engineering LORS in effect at the time initial design plans are submitted to the CBO for review and approval (the CBSC in effect is the edition that has been adopted by the California Building Standards Commission and published at least 180 days previously). The project owner shall ensure that all the provisions of the above applicable codes are enforced during the construction, addition, alteration, moving, demolition, repair, or maintenance of the completed facility. All transmission facilities (lines, switchyards, switching stations and substations) are covered in the conditions of certification in the **TRANSMISSION SYSTEM ENGINEERING** section of this document.

In the event that the initial engineering designs are submitted to the CBO when the successor to the 2007 CBSC is in effect, the 2007 CBSC provisions shall be replaced with the applicable successor provisions. Where, in any specific case, different sections of the code specify different materials, methods of construction or other requirements, the most restrictive shall govern. Where there is a conflict between a general requirement and a specific requirement, the specific requirement shall govern.

The project owner shall ensure that all contracts with contractors, subcontractors, and suppliers clearly specify that all work performed and materials supplied comply with the codes listed above.

Verification: Within 30 days following receipt of the certificate of occupancy, the project owner shall submit to the CPM a statement of verification, signed by the responsible design engineer, attesting that all designs, construction, installation, and inspection requirements of the applicable LORS and the Energy Commission's decision have been met in the area of facility design. The project owner shall provide the CPM a copy of the certificate of occupancy within 30 days of receipt from the CBO.

Once the certificate of occupancy has been issued, the project owner shall inform the CPM at least 30 days prior to any construction, addition, alteration, moving, demolition, repair, or maintenance to be performed on any portion(s) of the completed facility that requires CBO approval for compliance with the above codes. The CPM will then determine if the CBO needs to approve the work.

GEN-2 Before submitting the initial engineering designs for CBO review, the project owner shall furnish the CPM and the CBO with a schedule of facility design submittals, and master drawing and master specifications lists. The schedule shall contain a list of proposed submittal packages of designs, calculations,

and specifications for major structures and equipment. To facilitate audits by Energy Commission staff, the project owner shall provide specific packages to the CPM upon request.

Verification: At least 60 days (or a project owner- and CBO-approved alternative time frame) prior to the start of rough grading, the project owner shall submit to the CBO and to the CPM the schedule, the master drawing and master specifications lists of documents to be submitted to the CBO for review and approval. These documents shall be the pertinent design documents for the major structures and equipment listed in **Facility Design Table 2**, below. Major structures and equipment shall be added to or deleted from the table only with CPM approval. The project owner shall provide schedule updates in the monthly compliance report.

Facility Design Table 2
Major Structures and Equipment List

Equipment/System	Quantity (Plant)
SunCatcher Power Generating Unit (CT) Foundation and Connections	1 Lot
Administration Building Structure, Foundation and Connections	1
Maintenance Building Structure, Foundation and Connections	1
Assembly Building Structure, Foundation and Connections	3
Collector Group Generator Step-up Unit Transformer Foundation and Connections	1 Lot
Generator Collection Power Center	1 Lot
Generator Collection Sub-panel	1 Lot
Power Factor Capacitor	1 Lot
Open Bus Switch Rack	6
Shunt Capacitor Bank	6
Dynamic VAR Compression System	6
Disconnect Switch	15
Power Transformer Foundation and Connections	6
Coupling Capacitor Voltage Transformer Foundation and Connections	6
Diesel Power Generator Set Foundation and Connections	1
Fire Water Pump Foundation and Connections	1
Water Treatment System Foundation and Connections	1
Potable/Fire Water Tank Structure, Foundation and Connections	1
Well Water Storage Tank Structure, Foundation and Connections	1
Demineralized Water Storage Tank Structure, Foundation and Connections	2
Hydrogen Bottles Storage Area	1 Lot
Chemical Storage Area	1 Lot
Drainage Systems (including sanitary drain and waste)	1 Lot
High Pressure and Large Diameter Piping and Pipe Racks	1 Lot
HVAC and Refrigeration Systems	1 Lot
Temperature Control and Ventilation Systems (including water and sewer connections)	1 Lot
Building Energy Conservation Systems	1 Lot

Equipment/System	Quantity (Plant)
Substation, Switchboards, Transformers, Buses and Towers	1 Lot
Electrical Breakers, Cables/Duct Banks	1 Lot
Prefabricated Assemblies	1 Lot

GEN-3 The project owner shall make payments to the CBO for design review, plan checks, and construction inspections, based upon a reasonable fee schedule to be negotiated between the project owner and the CBO. These fees may be consistent with the fees listed in the 2007 CBC, adjusted for inflation and other appropriate adjustments; may be based on the value of the facilities reviewed; may be based on hourly rates; or may be otherwise agreed upon by the project owner and the CBO.

Verification: The project owner shall make the required payments to the CBO in accordance with the agreement between the project owner and the CBO. The project owner shall send a copy of the CBO's receipt of payment to the CPM in the next monthly compliance report indicating that applicable fees have been paid.

GEN-4 Prior to the start of rough grading, the project owner shall assign a California-registered architect, or a structural or civil engineer, as the resident engineer (RE) in charge of the project. All transmission facilities (lines, switchyards, switching stations, and substations) are addressed in the conditions of certification in the **TRANSMISSION SYSTEM ENGINEERING** section of this document.

The RE may delegate responsibility for portions of the project to other registered engineers. Registered mechanical and electrical engineers may be delegated responsibility for mechanical and electrical portions of the project, respectively. A project may be divided into parts, provided that each part is clearly defined as a distinct unit. Separate assignments of general responsibility may be made for each designated part.

The RE shall:

1. Monitor progress of construction work requiring CBO design review and inspection to ensure compliance with LORS;
2. Ensure that construction of all facilities subject to CBO design review and inspection conforms in every material respect to applicable LORS, these conditions of certification, approved plans, and specifications;
3. Prepare documents to initiate changes in approved drawings and specifications when either directed by the project owner or as required by the conditions of the project;
4. Be responsible for providing project inspectors and testing agencies with complete and up-to-date sets of stamped drawings, plans, specifications, and any other required documents;
5. Be responsible for the timely submittal of construction progress reports to the CBO from the project inspectors, the contractor, and other engineers who have been delegated responsibility for portions of the project; and

6. Be responsible for notifying the CBO of corrective action or the disposition of items noted on laboratory reports or other tests when they do not conform to approved plans and specifications.

The resident engineer (or his delegate) must be located at the project site, or be available at the project site within a reasonable period of time, during any hours in which construction takes place.

The RE shall have the authority to halt construction and to require changes or remedial work if the work does not meet requirements.

If the RE or the delegated engineers are reassigned or replaced, the project owner shall submit the name, qualifications and registration number of the newly assigned engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer.

Verification: At least 30 days (or project owner- and CBO-approved alternative time frame) prior to the start of rough grading, the project owner shall submit to the CBO for review and approval, the resume and registration number of the RE and any other delegated engineers assigned to the project. The project owner shall notify the CPM of the CBO's approvals of the RE and other delegated engineer(s) within 5 days of the approval.

If the RE or the delegated engineer(s) is subsequently reassigned or replaced, the project owner has 5 days to submit the resume and registration number of the newly assigned engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer within 5 days of the approval.

GEN-5 Prior to the start of rough grading, the project owner shall assign at least one of each of the following California registered engineers to the project: a civil engineer; a soils, geotechnical, or civil engineer experienced and knowledgeable in the practice of soils engineering; and an engineering geologist. Prior to the start of construction, the project owner shall assign at least one of each of the following California registered engineers to the project: a design engineer who is either a structural engineer or a civil engineer fully competent and proficient in the design of power plant structures and equipment supports; a mechanical engineer; and an electrical engineer. (California Business and Professions Code section 6704 et seq., and sections 6730, 6731 and 6736 require state registration to practice as a civil engineer or structural engineer in California). All transmission facilities (lines, switchyards, switching stations, and substations) are handled in the conditions of certification in the **TRANSMISSION SYSTEM ENGINEERING** section of this document.

The tasks performed by the civil, mechanical, electrical, or design engineers may be divided between two or more engineers, as long as each engineer is responsible for a particular segment of the project (for example, proposed earthwork, civil structures, power plant structures, equipment support). No segment of the project shall have more than one responsible engineer. The

transmission line may be the responsibility of a separate California registered electrical engineer.

The project owner shall submit, to the CBO for review and approval, the names, qualifications, and registration numbers of all responsible engineers assigned to the project.

If any one of the designated responsible engineers is subsequently reassigned or replaced, the project owner shall submit the name, qualifications and registration number of the newly assigned responsible engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer.

A. The civil engineer shall:

   1. Review the foundation investigations, geotechnical, or soils reports prepared by the soils engineer, the geotechnical engineer, or by a civil engineer experienced and knowledgeable in the practice of soils engineering;
   2. Design (or be responsible for the design of), stamp, and sign all plans, calculations, and specifications for proposed site work, civil works, and related facilities requiring design review and inspection by the CBO. At a minimum, these include: grading, site preparation, excavation, compaction, construction of secondary containment, foundations, erosion and sedimentation control structures, drainage facilities, underground utilities, culverts, site access roads and sanitary sewer systems; and
   3. Provide consultation to the RE during the construction phase of the project and recommend changes in the design of the civil works facilities and changes to the construction procedures.

B. The soils engineer, geotechnical engineer, or civil engineer experienced and knowledgeable in the practice of soils engineering, shall:

   1. Review all the engineering geology reports;
   2. Prepare the foundation investigations, geotechnical, or soils reports containing field exploration reports, laboratory tests, and engineering analysis detailing the nature and extent of the soils that could be susceptible to liquefaction, rapid settlement or collapse when saturated under load;
   3. Be present, as required, during site grading and earthwork to provide consultation and monitor compliance with requirements set forth in the 2007 CBC (depending on the site conditions, this may be the responsibility of either the soils engineer, the engineering geologist, or both); and
   4. Recommend field changes to the civil engineer and RE.

This engineer shall be authorized to halt earthwork and to require changes if site conditions are unsafe or do not conform to the predicted conditions used as the basis for design of earthwork or foundations.

C. The engineering geologist shall:

1. Review all the engineering geology reports and prepare a final soils grading report; and
2. Be present, as required, during site grading and earthwork to provide consultation and monitor compliance with the requirements set forth in the 2007 CBC (depending on the site conditions, this may be the responsibility of either the soils engineer, the engineering geologist, or both).

D. The design engineer shall:

1. Be directly responsible for the design of the proposed structures and equipment supports;
2. Provide consultation to the RE during design and construction of the project;
3. Monitor construction progress to ensure compliance with engineering LORS;
4. Evaluate and recommend necessary changes in design; and
5. Prepare and sign all major building plans, specifications, and calculations.

E. The mechanical engineer shall be responsible for, and sign and stamp a statement with, each mechanical submittal to the CBO, stating that the proposed final design plans, specifications, and calculations conform to all of the mechanical engineering design requirements set forth in the Energy Commission's decision.

F. The electrical engineer shall:

1. Be responsible for the electrical design of the project; and
2. Sign and stamp electrical design drawings, plans, specifications, and calculations.

Verification: At least 30 days (or project owner- and CBO-approved alternative time frame) prior to the start of rough grading, the project owner shall submit to the CBO for review and approval, resumes and registration numbers of the responsible civil engineer, soils (geotechnical) engineer and engineering geologist assigned to the project.

At least 30 days (or project owner- and CBO-approved alternative time frame) prior to the start of construction, the project owner shall submit to the CBO for review and approval, resumes and registration numbers of the responsible design engineer, mechanical engineer, and electrical engineer assigned to the project.

The project owner shall notify the CPM of the CBO's approvals of the responsible engineers within 5 days of the approval.

If the designated responsible engineer is subsequently reassigned or replaced, the project owner has 5 days in which to submit the resume and registration number of the newly assigned engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer within 5 days of the approval.

GEN-6 Prior to the start of an activity requiring special inspection, including prefabricated assemblies, the project owner shall assign to the project, qualified and certified special inspector(s) who shall be responsible for the special inspections required by the 2007 CBC. All transmission facilities (lines, switchyards, switching stations, and substations) are handled in conditions of certification in the **TRANSMISSION SYSTEM ENGINEERING** section of this document.

A certified weld inspector, certified by the American Welding Society (AWS), and/or American Society of Mechanical Engineers (ASME) as applicable, shall inspect welding performed on-site requiring special inspection (including structural, piping, tanks and pressure vessels).

The special inspector shall:

1. Be a qualified person who shall demonstrate competence, to the satisfaction of the CBO, for inspection of the particular type of construction requiring special or continuous inspection;
2. Inspect the work assigned for conformance with the approved design drawings and specifications;
3. Furnish inspection reports to the CBO and RE. All discrepancies shall be brought to the immediate attention of the RE for correction, then, if uncorrected, to the CBO and the CPM for corrective action; and
4. Submit a final signed report to the RE, CBO, and CPM, stating whether the work requiring special inspection was, to the best of the inspector's knowledge, in conformance with the approved plans, specifications, and other provisions of the applicable edition of the CBC.

Verification: At least 15 days (or project owner- and CBO-approved alternative time frame) prior to the start of an activity requiring special inspection, the project owner shall submit to the CBO for review and approval, with a copy to the CPM, the name(s) and qualifications of the certified weld inspector(s), or other certified special inspector(s) assigned to the project to perform one or more of the duties set forth above. The project owner shall also submit to the CPM a copy of the CBO's approval of the qualifications of all special inspectors in the next monthly compliance report.

If the special inspector is subsequently reassigned or replaced, the project owner has 5 days in which to submit the name and qualifications of the newly assigned special inspector to the CBO for approval. The project owner shall notify the CPM of the CBO's approval of the newly assigned inspector within 5 days of the approval.

GEN-7 If any discrepancy in design and/or construction is discovered in any engineering work that has undergone CBO design review and approval, the project owner shall document the discrepancy and recommend required corrective actions. The discrepancy documentation shall be submitted to the CBO for review and approval. The discrepancy documentation shall reference this condition of certification and, if appropriate, applicable sections of the CBC and/or other LORS.

Verification: The project owner shall transmit a copy of the CBO's approval of any corrective action taken to resolve a discrepancy to the CPM in the next monthly compliance report. If any corrective action is disapproved, the project owner shall advise the CPM, within 5 days, of the reason for disapproval and the revised corrective action to obtain CBO's approval.

GEN-8 The project owner shall obtain the CBO's final approval of all completed work that has undergone CBO design review and approval. The project owner shall request the CBO to inspect the completed structure and review the submitted documents. The project owner shall notify the CPM after obtaining the CBO's final approval. The project owner shall retain one set of approved engineering plans, specifications, and calculations (including all approved changes) at the project site or at another accessible location during the operating life of the project. Electronic copies of the approved plans, specifications, calculations, and marked-up as-builts shall be provided to the CBO for retention by the CPM.

Verification: Within 15 days of the completion of any work, the project owner shall submit to the CBO, with a copy to the CPM, in the next monthly compliance report, (a) a written notice that the completed work is ready for final inspection, and (b) a signed statement that the work conforms to the final approved plans. After storing the final approved engineering plans, specifications, and calculations described above, the project owner shall submit to the CPM a letter stating both that the above documents have been stored and the storage location of those documents.

Within 90 days of the completion of construction, the project owner shall provide to the CBO three sets of electronic copies of the above documents at the project owner's expense. These are to be provided in the form of "read only" (Adobe .pdf 6.0) files, with restricted (password-protected) printing privileges, on archive quality compact discs.

CIVIL-1 The project owner shall submit to the CBO for review and approval the following:

1. Design of the proposed drainage structures and the grading plan;
2. An erosion and sedimentation control plan;
3. Related calculations and specifications, signed and stamped by the responsible civil engineer; and
4. Soils, geotechnical, or foundation investigations reports required by the 2007 CBC.

Verification: At least 15 days (or project owner- and CBO-approved alternative time frame) prior to the start of site grading the project owner shall submit the documents

described above to the CBO for design review and approval. In the next monthly compliance report following the CBO's approval, the project owner shall submit a written statement certifying that the documents have been approved by the CBO.

CIVIL-2 The resident engineer shall, if appropriate, stop all earthwork and construction in the affected areas when the responsible soils engineer, geotechnical engineer, or the civil engineer experienced and knowledgeable in the practice of soils engineering identifies unforeseen adverse soil or geologic conditions. The project owner shall submit modified plans, specifications, and calculations to the CBO based on these new conditions. The project owner shall obtain approval from the CBO before resuming earthwork and construction in the affected area.

Verification: The project owner shall notify the CPM within 24 hours, when earthwork and construction is stopped as a result of unforeseen adverse geologic/soil conditions. Within 24 hours of the CBO's approval to resume earthwork and construction in the affected areas, the project owner shall provide to the CPM a copy of the CBO's approval.

CIVIL-3 The project owner shall perform inspections in accordance with the 2007 CBC. All plant site-grading operations, for which a grading permit is required, shall be subject to inspection by the CBO.

If, in the course of inspection, it is discovered that the work is not being performed in accordance with the approved plans, the discrepancies shall be reported immediately to the resident engineer, the CBO, and the CPM. The project owner shall prepare a written report, with copies to the CBO and the CPM, detailing all discrepancies, non-compliance items, and the proposed corrective action.

Verification: Within 5 days of the discovery of any discrepancies, the resident engineer shall transmit to the CBO and the CPM a non-conformance report (NCR), and the proposed corrective action for review and approval. Within 5 days of resolution of the NCR, the project owner shall submit the details of the corrective action to the CBO and the CPM. A list of NCRs, for the reporting month, shall also be included in the following monthly compliance report.

CIVIL-4 After completion of finished grading and erosion and sedimentation control and drainage work, the project owner shall obtain the CBO's approval of the final grading plans (including final changes) for the erosion and sedimentation control work. The civil engineer shall state that the work within his/her area of responsibility was done in accordance with the final approved plans.

Verification: Within 30 days (or project owner- and CBO-approved alternative time frame) of the completion of the erosion and sediment control mitigation and drainage work, the project owner shall submit to the CBO, for review and approval, the final grading plans (including final changes) and the responsible civil engineer's signed statement that the installation of the facilities and all erosion control measures were completed in accordance with the final approved combined grading plans, and that the facilities are adequate for their intended purposes, along with a copy of the transmittal

letter to the CPM. The project owner shall submit a copy of the CBO's approval to the CPM in the next monthly compliance report.

STRUC-1 Prior to the start of any increment of construction of any major structure or component listed in **Facility Design Table 2** of condition of certification **GEN-2**, above, the project owner shall submit to the CBO for design review and approval the proposed lateral force procedures for project structures and the applicable designs, plans and drawings for project structures. Proposed lateral force procedures, designs, plans and drawings shall be those for the following items (from **Table 2**, above):

1. Major project structures;
2. Major foundations, equipment supports, and anchorage; and
3. Large field-fabricated tanks.

Construction of any structure or component shall not begin until the CBO has approved the lateral force procedures to be employed in designing that structure or component.

The project owner shall:

1. Obtain approval from the CBO of lateral force procedures proposed for project structures;
2. Obtain approval from the CBO for the final design plans, specifications, calculations, soils reports, and applicable quality control procedures. If there are conflicting requirements, the more stringent shall govern (for example, highest loads, or lowest allowable stresses shall govern). All plans, calculations, and specifications for foundations that support structures shall be filed concurrently with the structure plans, calculations, and specifications;
3. Submit to the CBO the required number of copies of the structural plans, specifications, calculations, and other required documents of the designated major structures prior to the start of on-site fabrication and installation of each structure, equipment support, or foundation;
4. Ensure that the final plans, calculations, and specifications clearly reflect the inclusion of approved criteria, assumptions, and methods used to develop the design. The final designs, plans, calculations, and specifications shall be signed and stamped by the responsible design engineer; and
5. Submit to the CBO the responsible design engineer’s signed statement that the final design plans conform to applicable LORS.

Verification: At least 60 days (or project owner- and CBO-approved alternative time frame) prior to the start of any increment of construction of any structure or component listed in **Facility Design Table 2** of condition of certification **GEN-2**, above, the project owner shall submit to the CBO the above final design plans, specifications and calculations, with a copy of the transmittal letter to the CPM.

The project owner shall submit to the CPM, in the next monthly compliance report, a copy of a statement from the CBO that the proposed structural plans, specifications, and calculations have been approved and comply with the requirements set forth in applicable engineering LORS.

STRUC-2 The project owner shall submit to the CBO the required number of sets of the following documents related to work that has undergone CBO design review and approval:

1. Concrete cylinder strength test reports (including date of testing, date sample taken, design concrete strength, tested cylinder strength, age of test, type and size of sample, location and quantity of concrete placement from which sample was taken, and mix design designation and parameters);
2. Concrete pour sign-off sheets;
3. Bolt torque inspection reports (including location of test, date, bolt size, and recorded torques);
4. Field weld inspection reports (including type of weld, location of weld, inspection of non-destructive testing (NDT) procedure and results, welder qualifications, certifications, qualified procedure description or number (ref: AWS); and
5. Reports covering other structural activities requiring special inspections shall be in accordance with the 2007 CBC.

Verification: If a discrepancy is discovered in any of the above data, the project owner shall, within 5 days, prepare and submit an NCR describing the nature of the discrepancies and the proposed corrective action to the CBO, with a copy of the transmittal letter to the CPM. The NCR shall reference the condition(s) of certification and the applicable CBC chapter and section. Within 5 days of resolution of the NCR, the project owner shall submit a copy of the corrective action to the CBO and the CPM.

The project owner shall transmit a copy of the CBO's approval or disapproval of the corrective action to the CPM within 15 days. If disapproved, the project owner shall advise the CPM, within 5 days, the reason for disapproval, and the revised corrective action to obtain CBO's approval.

STRUC-3 The project owner shall submit to the CBO design changes to the final plans required by the 2007 CBC, including the revised drawings, specifications, calculations, and a complete description of, and supporting rationale for, the proposed changes, and shall give to the CBO prior notice of the intended filing.

Verification: On a schedule suitable to the CBO, the project owner shall notify the CBO of the intended filing of design changes, and shall submit the required number of sets of revised drawings and the required number of copies of the other above-mentioned documents to the CBO, with a copy of the transmittal letter to the CPM. The project owner shall notify the CPM, via the monthly compliance report, when the CBO has approved the revised plans.

STRUC-4 Tanks and vessels containing quantities of toxic or hazardous materials exceeding amounts specified in the 2007 CBC shall, at a minimum, be designed to comply with the requirements of that chapter.

Verification: At least 30 days (or project owner- and CBO-approved alternate time frame) prior to the start of installation of the tanks or vessels containing the above specified quantities of toxic or hazardous materials, the project owner shall submit to the CBO for design review and approval final design plans, specifications, and calculations, including a copy of the signed and stamped engineer's certification.

The project owner shall send copies of the CBO approvals of plan checks to the CPM in the following monthly compliance report. The project owner shall also transmit a copy of the CBO's inspection approvals to the CPM in the monthly compliance report following completion of any inspection.

MECH-1 The project owner shall submit, for CBO design review and approval, the proposed final design, specifications and calculations for each plant major piping and plumbing system listed in **Facility Design Table 2**, condition of certification **GEN-2**, above. Physical layout drawings and drawings not related to code compliance and life safety need not be submitted. The submittal shall also include the applicable QA/QC procedures. Upon completion of construction of any such major piping or plumbing system, the project owner shall request the CBO's inspection approval of that construction.

The responsible mechanical engineer shall stamp and sign all plans, drawings, and calculations for the major piping and plumbing systems, subject to CBO design review and approval, and submit a signed statement to the CBO when the proposed piping and plumbing systems have been designed, fabricated, and installed in accordance with all of the applicable laws, ordinances, regulations and industry standards, which may include, but are not limited to:

- American National Standards Institute (ANSI) B31.1 (Power Piping Code);
- ANSI B31.2 (Fuel Gas Piping Code);
- ANSI B31.3 (Chemical Plant and Petroleum Refinery Piping Code);
- ANSI B31.8 (Gas Transmission and Distribution Piping Code);
- Title 24, California Code of Regulations, Part 5 (California Plumbing Code);
- Title 24, California Code of Regulations, Part 6 (California Energy Code, for building energy conservation systems and temperature control and ventilation systems);
- Title 24, California Code of Regulations, Part 2 (California Building Code); and
- San Bernardino County codes.

The CBO may deputize inspectors to carry out the functions of the code enforcement agency.

Verification: At least 30 days (or project owner- and CBO-approved alternative time frame) prior to the start of any increment of major piping or plumbing construction listed in **Facility Design Table 2**, condition of certification **GEN-2,** above, the project owner shall submit to the CBO for design review and approval the final plans, specifications, and calculations, including a copy of the signed and stamped statement from the responsible mechanical engineer certifying compliance with applicable LORS, and shall send the CPM a copy of the transmittal letter in the next monthly compliance report.

The project owner shall transmit to the CPM, in the monthly compliance report following completion of any inspection, a copy of the transmittal letter conveying the CBO's inspection approvals.

MECH-2 For all pressure vessels installed in the plant, the project owner shall submit to the CBO and California Occupational Safety and Health Administration (Cal-OSHA), prior to operation, the code certification papers and other documents required by applicable LORS. Upon completion of the installation of any pressure vessel, the project owner shall request the appropriate CBO and/or Cal-OSHA inspection of that installation.

The project owner shall:

1. Ensure that all boilers and fired and unfired pressure vessels are designed, fabricated, and installed in accordance with the appropriate section of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, or other applicable code. Vendor certification, with identification of applicable code, shall be submitted for prefabricated vessels and tanks; and
2. Have the responsible design engineer submit a statement to the CBO that the proposed final design plans, specifications, and calculations conform to all of the requirements set forth in the appropriate ASME Boiler and Pressure Vessel Code or other applicable codes.

Verification: At least 30 days (or project owner- and CBO-approved alternative time frame) prior to the start of on-site fabrication or installation of any pressure vessel, the project owner shall submit to the CBO for design review and approval, the above listed documents, including a copy of the signed and stamped engineer's certification, with a copy of the transmittal letter to the CPM.

The project owner shall transmit to the CPM, in the monthly compliance report following completion of any inspection, a copy of the transmittal letter conveying the CBO's and/or Cal-OSHA inspection approvals.

MECH-3 The project owner shall submit to the CBO for design review and approval the design plans, specifications, calculations, and quality control procedures for any heating, ventilating, air conditioning (HVAC) or refrigeration system. Packaged HVAC systems, where used, shall be identified with the appropriate manufacturer's data sheets.

The project owner shall design and install all HVAC and refrigeration systems within buildings and related structures in accordance with the CBC and other

applicable codes. Upon completion of any increment of construction, the project owner shall request the CBO's inspection and approval of that construction. The final plans, specifications and calculations shall include approved criteria, assumptions, and methods used to develop the design. In addition, the responsible mechanical engineer shall sign and stamp all plans, drawings and calculations and submit a signed statement to the CBO that the proposed final design plans, specifications and calculations conform with the applicable LORS.

Verification: At least 30 days (or project owner- and CBO-approved alternative time frame) prior to the start of construction of any HVAC or refrigeration system, the project owner shall submit to the CBO the required HVAC and refrigeration calculations, plans, and specifications, including a copy of the signed and stamped statement from the responsible mechanical engineer certifying compliance with the CBC and other applicable codes, with a copy of the transmittal letter to the CPM.

ELEC-1 Prior to the start of any increment of electrical construction for all electrical equipment and systems 480 Volts or higher (see a representative list, below), with the exception of underground duct work and any physical layout drawings and drawings not related to code compliance and life safety, the project owner shall submit, for CBO design review and approval, the proposed final design, specifications, and calculations. Upon approval, the above listed plans, together with design changes and design change notices, shall remain on the site or at another accessible location for the operating life of the project. The project owner shall request that the CBO inspect the installation to ensure compliance with the requirements of applicable LORS. All transmission facilities (lines, switchyards, switching stations, and substations) are handled in conditions of certification in the **TRANSMISSION SYSTEM ENGINEERING** section of this document.

A. Final plant design plans shall include:
   1. one-line diagrams for the 13.8 kV, 4.16 kV and 480 V systems; and
   2. system grounding drawings.

B. Final plant calculations must establish:
   1. short-circuit ratings of plant equipment;
   2. ampacity of feeder cables;
   3. voltage drop in feeder cables;
   4. system grounding requirements;
   5. coordination study calculations for fuses, circuit breakers and protective relay settings for the 13.8 kV, 4.16 kV and 480 V systems;
   6. system grounding requirements; and
   7. lighting energy calculations.

C. The following activities shall be reported to the CPM in the monthly compliance report:

1. Receipt or delay of major electrical equipment;
2. Testing or energization of major electrical equipment; and
3. A signed statement by the registered electrical engineer certifying that the proposed final design plans and specifications conform to requirements set forth in the Energy Commission decision.

Verification: At least 30 days (or project owner- and CBO-approved alternative time frame) prior to the start of each increment of electrical construction, the project owner shall submit to the CBO for design review and approval the above listed documents. The project owner shall include in this submittal a copy of the signed and stamped statement from the responsible electrical engineer attesting compliance with the applicable LORS, and shall send the CPM a copy of the transmittal letter in the next monthly compliance report.

D.1.13 CONCLUSIONS

1. The laws, ordinances, regulations and standards (LORS) identified in the AFC and supporting documents directly apply to the project.
2. Staff has evaluated the proposed engineering LORS, design criteria, and design methods in the record, and concludes that the design, construction, and eventual closure of the project will likely comply with applicable engineering LORS.
3. The proposed conditions of certification will ensure that the Calico Solar Project is designed and constructed in accordance with applicable engineering LORS. This will be accomplished through design review, plan checking, and field inspections that will be performed by the CBO or other Energy Commission delegate. Staff will audit the CBO to ensure satisfactory performance.
4. Though future conditions that could affect decommissioning are largely unknown at this time, it can reasonably be concluded that if, the project owner submits a decommissioning plan as required in the **GENERAL CONDITIONS** portion of this document prior to decommissioning, decommissioning procedures will comply with all applicable engineering LORS.

Energy Commission staff recommends that:

1. The proposed conditions of certification be adopted to ensure that the project is designed and constructed in a manner that protects the public health and safety and complies with all applicable engineering LORS;
2. The project be designed and built to the 2007 CBSC (or successor standards, if in effect when initial project engineering designs are submitted for review); and
3. The CBO reviews the final designs, checks plans, and performs field inspections during construction. Energy Commission staff shall audit and monitor the CBO to ensure satisfactory performance.

D.1.14 REFERENCES

SES Solar One 2008a – Application for Certification for the Stirling Energy Systems (SES) Solar One Project, Volumes 1 and 2 (tn: 49181). Submitted to the California Energy Commission on December 1, 2008.

TS 2010ag - Tessera Solar/ F. Bellows (tn 57018). Applicant's Submittal of Alternative Site Layout #2 - Engineering Figure with SunCatcher Layout, and Revised Project Boundary with 4000' Desert Tortoise Corridor Figure, dated June 2, 2010. Submitted to CEC/Docket Unit on June 2, 2010.

TS 2010am - Tessera Solar/ F. Bellows (tn 56700). Applicant's Submittal of a Supplement to the AFC, dated May 14, 2010. Submitted to CEC/Docket Unit on May 18, 2010.

D.2 – GEOLOGIC STABILITY

Testimony of Dal Hunter, Ph.D., C.E.G.

D.2.1 SUMMARY OF CONCLUSIONS

(NOTE: The GEOLOGIC STABILITY issue area has been addressed as part of Section C.4 GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES. The summary below is from that environmental analysis. Please refer to that section for the full analysis.)

The proposed Calico Solar Project (formerly the Stirling Energy Systems Solar One Project) site is located in an active geologic area of the north-central Mojave Desert Geomorphic Province in central San Bernardino County in south-central California. Because of its geologic setting, the site could be subject to intense levels of earthquake-related ground shaking. The effects of strong ground shaking would need to be mitigated, to the extent practical, through structural designs required by the California Building Code (CBC 2007) and the project geotechnical report. The CBC (2007) requires that structures be designed to resist seismic stresses from ground acceleration and, to a lesser extent, liquefaction. A geotechnical investigation has been performed and presents standard engineering design recommendations for mitigation of seismic shaking and site soil conditions. Proposed Conditions of Certification **GEO-1**, **GEO-2**, and **GEO-3** relate to evaluation of suspected on-site strike-slip faults and to design and construction of storm water detention ponds and dams.

There are no known viable geologic or mineralogical resources at the proposed Calico Solar Project site. Locally, paleontological resources have been documented within older Quaternary alluvium which underlies the younger Quaternary alluvium of the site surface. Potential impacts to paleontological resources would be mitigated through worker training and monitoring by qualified paleontologists, as required by proposed Conditions of Certification, **PAL-1** through **PAL-7**.

Based on its independent research and review, California Energy Commission staff believes that the potential is low for significant adverse impacts to the proposed project from geologic hazards during its design life and to potential geologic, mineralogic, and paleontological resources from the construction, operation, and closure of the proposed project. It is staff's opinion that the Calico Solar Project can be designed and constructed in accordance with all applicable laws, ordinances, regulations, and standards and in a manner that both protects environmental quality and assures public safety, to the extent practical. Implementation and enforcement of the proposed conditions of certification should result in less than significant impacts to geology and paleontology.

D.3 - POWER PLANT EFFICIENCY

Testimony of Shahab Khoshmashrab

D.3.1 SUMMARY OF CONCLUSIONS

The Calico Solar Project (formerly known as the Stirling Energy Systems Solar One Project), if constructed and operated as proposed, would generate 850 megawatts (MW) (nominal net output) of electricity. Calico Solar would be a solar thermal power plant to be built on an approximately 6,215-acre site in San Bernardino County, California. The project would use a Stirling engine-based solar thermal technology to produce electrical power using 34,000 Stirling Energy Systems SunCatcher units. Calico Solar would use solar energy to generate all of its capacity; no fossil fuel (natural gas) would be used for power production.

The project would decrease reliance on fossil fuel, and would increase reliance on renewable energy resources. It would not create significant adverse effects on fossil fuel energy supplies or resources, would not require additional sources of energy supply, and would not consume fossil fuel energy in a wasteful or inefficient manner. No efficiency standards apply to this project. Staff therefore concludes that this project would present no significant adverse impacts on fossil fuel energy resources.

Employing a less land-intensive solar technology, such as the linear parabolic trough technology, would increase the solar land use efficiency of Calico Solar. Staff believes Calico Solar represents one of the least land use-efficient solar technologies proposed by the projects currently in the Energy Commission's licensing process. Staff recognizes that the modular technology of the SunCatcher system allows the project to avoid environmental resource areas within the project boundaries, reducing the density of the SunCatcher units and likewise the land use efficiency. Nonetheless, larger project footprint per megawatt precludes other use of the land.

D.3.2 INTRODUCTION

Fossil Fuel Use Efficiency

One of the responsibilities of the California Energy Commission (Energy Commission) is to make findings on whether the energy use by a power plant, including the proposed Calico Solar Project, would result in significant adverse impacts on the environment, as defined in the California Environmental Quality Act (CEQA). If the Energy Commission finds that Calico Solar's energy consumption creates a significant adverse impact under CEQA, it must further determine if feasible mitigation measures could eliminate or minimize that impact. In this analysis, staff addresses the inefficient and unnecessary consumption of energy.

In order to support the Supplemental Staff Assessment's (SSA's) findings, this analysis will:

- examine whether the facility would likely present any adverse impacts upon energy resources;

- examine whether these adverse impacts are significant; and if so,
- examine whether feasible mitigation measures or alternatives could eliminate those adverse impacts or reduce them to a level of insignificance.

Solar Land Use Efficiency

Solar thermal power plants typically consume much less fossil fuel (usually in the form of natural gas) than other types of thermal power plants. Therefore, common measures of power plant efficiency such as those described above are less meaningful. Solar power plants do occupy vast tracts of land, so, the focus for these types of facilities shifts from fuel efficiency to land use efficiency. To analyze the land use efficiency of a solar facility staff utilizes the following approach.

Solar thermal power plants convert the sun's energy into electricity in three basic steps:

- Mirrors and/or collectors capture the sun's rays.
- This solar energy is converted into heat.
- This heat is converted into electricity, typically in a heat engine such as a steam turbine generator or a Stirling Engine-powered generator.

The effectiveness of each of these steps depends on the specific technology employed; the product of these three steps determines the power plant's overall solar efficiency. The greater the project's solar efficiency, the less land the plant must occupy to produce a given power output.

The most significant environmental impacts caused by solar power plants result from occupying large expanses of land. The extent of these impacts is directly related to the number of acres affected. For this reason, staff will evaluate the land use efficiency of proposed solar power plant projects. This efficiency will be expressed in terms of power produced, or MW per acre, and in terms of energy produced, or MW-hours per acre-year. Specifically:

- **Power-based** solar land use efficiency is calculated by dividing the maximum net power output in MW by the total number of acres impacted by the power plant, including roads and electrical switchyards and substations.

- **Energy-based** solar land use efficiency is calculated by dividing the annual net electrical energy production in MW-hours per year by the total number of acres impacted by the power plant. Since different solar technologies consume differing quantities of natural gas for morning warm-up, cloudy weather output leveling and heat transfer fluid freeze protection (and some consume no gas at all), this effect will be accounted for. Specifically, gas consumption will be backed out by reducing the plant's net energy output by the amount of energy that could have been produced by consuming the project's annual gas consumption in a modern combined cycle power plant. This reduced energy output will then be divided by acres impacted. Since Calico Solar would consume no natural gas, this correction is unnecessary for this analysis.

D.3.3 METHODOLOGY AND THRESHOLDS FOR DETERMINING ENVIRONMENTAL CONSEQUENCES

The Calico Solar Project would consume no natural gas or other fossil fuel for power generation. However, some electricity would be consumed in operating the plant. Each of the 34,000 Stirling engines is filled with hydrogen gas, which acts as a working fluid that allows the engine to operate. During operation, hydrogen leaks from the engines and must be continuously replenished from pressure bottles located at each SunCatcher, or by means of a centralized hydrogen system connected to each SunCatcher.

Hydrogen is typically produced either from natural gas, or by electrolysis of water using electricity. The applicant explained that approximately 7.2 million standard cubic feet of hydrogen gas per year would be produced to supply the necessary replenishment hydrogen (SES 2009e, Data Response 58). Hydrogen would be created on-site by electrolysis of water using electricity from the grid, consuming approximately 37 MWh of electrical energy annually (SES 2009e, Data Response 59). In addition, compressing the hydrogen gas to operating pressure would consume approximately 178 MWh of electricity per year (SES 2009e, Data Response 60) for a total of 215 MW-hours per year. Compared to any power plant of equal capacity, this rate is insignificant. Energy Commission staff, however, will include this consumption in calculating the plant's efficiency, below.

There are currently no legal or industry standards for measuring the efficiency of solar thermal power plants (CEC 2008c). Stirling Energy Systems claims that the SunCatcher exhibits a conversion efficiency of 31.25 percent (SES 2008a, AFC § 1.3).

Since the project will not consume any natural gas, staff considers the impact of the project's fuel consumption on energy supplies and energy efficiency to be less than significant.

Adverse Effects on Energy Supplies and Resources

The applicant would produce hydrogen gas onsite through electrolysis of water (SES 2009e, Data Responses 57-60). Staff deems it unlikely that this could cause any measurable impact on energy supplies.

Additional Energy Supply Requirements

Since supplying the project with hydrogen gas would consume such an insignificant amount of energy, there is no likelihood that additional energy supplies would be required.

Compliance With Energy Standards

No standards apply to the efficiency of Calico Solar or other non-cogeneration projects.

Alternatives To Reduce Wasteful, Inefficient, and Unnecessary Energy Consumption

Staff evaluates the project alternatives to determine if alternatives exist that could reduce the project's fuel use. The evaluation of alternatives to the project (that could reduce wasteful, inefficient, or unnecessary energy consumption) requires the examination of the project's energy consumption. The project's fuel consumption would be negligible, therefore staff need not evaluate alternatives that could reduce or eliminate the use of natural gas.

Efficiency of Alternatives to the Project

Calico Solar's objectives include the generation of electricity using the Stirling Energy Systems SunCatcher solar thermal technology via a 20-year power purchase agreement with SCE for renewable power (SES 2008a, AFC §§ 2.0, 2.1, 2.2).

Alternative Generating Technologies

Alternative generating technologies for Calico Solar are considered in the AFC (SES 2008a, AFC §§ 4.4.1, 4.4.2, 4.4.3). For purposes of this analysis, natural gas, oil, coal, nuclear, geothermal, biomass, hydroelectric, wind and solar photovoltaic technologies are all considered. Given the project objectives, location, air pollution control requirements, and the commercial availability of the above technologies, staff agrees with the applicant that the selected solar thermal technology is a reasonable selection.

Staff, therefore, believes that Calico Solar would not constitute a significant adverse impact on fossil fuel energy resources compared to feasible alternatives.

D.3.4 PROPOSED PROJECT

D.3.4.1 SETTING AND EXISTING CONDITIONS

The applicant proposes to build and operate Calico Solar, a solar thermal power plant producing a total of 850 MW (nominal net output) and employing Stirling Energy Systems SunCatcher technology. The project's solar field and support facilities would occupy approximately 6,215 acres of land (the land used for power generation or power plant operation) and would consist of 34,000 SunCatchers (SES 2010i, Figure 1-1)).

Each SunCatcher is composed of a pedestal, a mirrored dish that tracks the sun, and a power conversion unit (PCU) consisting of a solar receiver, a closed-cycle Stirling engine, and a generator that capture the solar energy and convert it to electricity. Each SunCatcher is capable of generating 25 kW of power. Power would be routed from the SunCatchers to electrical transformers, then to a switchyard located near the center of the project (SES 2008a, AFC §§ 3.1, 3.1.1, 3.4.1, 3.4.3, 3.4.4.1, 3.4.4.2).

The project would not use fossil fuel to generate electricity. However, some electricity consumption would result due to the necessity of replacing hydrogen gas that leaks from the Stirling engines; see below.

D.3.4.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

Project Energy Requirements and Energy Use Efficiency

Calico Solar would consume no natural gas or other fossil fuel for power generation. However, some electricity would be consumed in operating the plant. Each of the 34,000 Stirling engines is filled with hydrogen gas, which acts as a working fluid that allows the engine to operate. During operation, hydrogen leaks from the engines and must be continuously replenished from pressure bottles located at each SunCatcher, or from a centralized hydrogen distribution system.

The applicant explained that hydrogen would be created on-site by electrolysis of water using electricity from the grid, consuming approximately 37 MWh of electrical energy annually. In addition, compressing the hydrogen gas to operating pressure would consume an additional 178 MWh per year (SES 2009e, Data Responses 58-60), for a total of 215 MW-hours per year. Compared to a typical natural gas-fired power plant of equal capacity, this rate is insignificant. Energy Commission staff, however, will include this consumption in calculating the plant's efficiency, below.

There are currently no legal or industry standards for measuring the efficiency of solar thermal power plants (CEC 2008c). Stirling Energy Systems claims that the SunCatcher exhibits a conversion efficiency of 31.25 percent (SES 2008a, AFC § 1.3).

Due to the project's negligible consumption of natural gas, staff considers the impact of the project's fuel consumption on energy supplies and energy efficiency to be less than significant.

Adverse Effects on Energy Supplies and Resources

The applicant would produce hydrogen gas onsite through electrolysis of water, consuming 215 MW-hours of electrical energy per year (SES 2009e, Data Responses 57-60). Staff deems it unlikely that this insignificant level of consumption could cause any measurable impact on energy supplies.

Additional Energy Supply Requirements

Since supplying the project with hydrogen gas would consume such an insignificant amount of energy, there is no likelihood that additional energy supplies would be required.

Compliance With Energy Standards

No standards apply to the efficiency of Calico Solar or other non-cogeneration projects.

Alternatives to Reduce Wasteful, Inefficient, And Unnecessary Energy Consumption

Staff evaluates the project alternatives to determine if alternatives exist that could reduce the project's fuel use. The evaluation of alternatives to the project (that could reduce wasteful, inefficient, or unnecessary energy consumption) requires the examination of the project's energy consumption. The project's fuel consumption would

be negligible, therefore staff need not evaluate alternatives that could reduce or eliminate the use of natural gas.

Efficiency of Alternatives to the Project

Calico Solar's objectives include the generation of electricity using the Stirling Energy Systems SunCatcher solar thermal technology via a 20-year power purchase agreement with SCE for renewable power (SES 2008a, AFC §§ 2.0, 2.1, 2.2).

Alternative Generating Technologies

Alternative generating technologies for Solar One are considered in the AFC (SES 2008a, AFC §§ 4.4.1, 4.4.2, 4.4.3). For purposes of this analysis, natural gas, oil, coal, nuclear, geothermal, biomass, hydroelectric, wind and solar photovoltaic technologies are all considered. Given the project objectives, location, air pollution control requirements, and the commercial availability of the above technologies, staff agrees with the applicant that the selected solar thermal technology is a reasonable selection.

Staff, therefore, believes that the Calico Solar Project would not constitute a significant adverse impact on fossil fuel energy resources compared to feasible alternatives.

The solar insolation falling on the earth's surface can be regarded as an energy resource. Since this energy is inexhaustible, its consumption does not present the concerns inherent in fossil fuel consumption. What is of concern, however, is the extent of land area required to capture this solar energy and convert it to electricity. Setting aside hundreds or thousands of acres of land for solar power generation removes it from alternative uses.

To assess the Calico Solar's land use efficiency, staff compares the land use efficiency of the solar projects currently before the Commission to the Calico Solar. This comparison helps determine a range of viable efficiencies and where the Calico Solar falls.

Method and Threshold for Determining the Significance of Solar Land Use Energy Resources

Energy Commission staff proposes to compare the land use of a solar power plant project to that of other solar projects in the Energy Commission's siting process. Staff proposes to compare several solar projects currently in the process. As this is written, several solar power plant projects have progressed significantly through the Energy Commission siting process. These projects' power and energy output, and the extent of the land occupied by them, are summarized in **Efficiency Table 1**, below. The solar land use efficiency for a typical natural gas-fired combined cycle power plant is shown only for comparison.

Adverse Effects on Project Land Use

The Calico Solar Project would produce power at the rate of 850 MW net, and would generate energy at the rate of 1,840,000 MW-hours net per year, while occupying 6,215 acres for the solar field and support facilities (the land used for power generation or power plant operation) (SES 2010i, Figure 1-1). Staff calculates power-based and energy-based land use efficiency thus:

Power-based efficiency: 850 MW ÷ 6,215 acres = **0.14 MW/acre** or **7.3 acres/MW**

Energy-based efficiency: First, back out the electrical energy consumed in hydrogen replenishment:

1,840,000 MWh/year – 215 MWh/year = 1,839,785 MWh/year
1,839,785 MWh/year ÷ 6,215 acres = **296 MWh/acre-year**

As seen in **Efficiency Table 1**, Solar One, employing the Stirling Energy Systems SunCatcher technology, is less efficient in use of land than the Beacon Solar, Ridgecrest Solar, Palen Solar, and Blythe Solar projects, which would employ linear parabolic trough technology. Calico Solar is more efficient in use of land than the Ivanpah Solar Electric Generating System project, which would employ BrightSource's power tower technology.

Alternatives to Reduce Solar Land Use Impacts

Building and operating a natural gas-fired combined cycle power plant would yield much greater land use efficiency than any solar power plant; see **Efficiency Table 1**. However, this would not achieve the basic project objective, to generate electricity from the renewable energy of the sun.

Efficiency Table 1
Solar Land Use Efficiency

Project	Generating Capacity (MW net)	Annual Energy Production (MWh net)	Annual Fuel Consump-tion (MMBtu LHV)	Foot-print (Acres)	Land Use Efficiency (Power-Based) (MW/acre)	Land Use Efficiency (Energy – Based) (MWh/acre-year)	
						Total	Solar Only[1]
Calico Solar (08-AFC-13)	**850**	**1,840,000**	**0**	**6,215**	**0.14**	**296**	**296**
Beacon Solar (08-AFC-2)	250	600,000	36,000	1,240	0.20	484	480
Ivanpah SEGS (07-AFC-5)	400	960,000	432,432	3,744	0.11	256	238
Abengoa Solar (09-AFC-5)	250	630,000	94,280	1420	0.18	444	434
Blythe Solar (09-AFC-6)	1000	2,100,000	207,839	5,950	0.17	353	348
Palen Solar (09-AFC-7)	500	1,000,000	103,919	2970	0.17	337	332
Genesis Solar (09-AFC-8)	250	600,000	60,000	1,800	0.14	333	329
Ridgecrest Solar (09-AFC-9)	250	500,000	51,960	1,440	0.17	347	342
San Joaquin Solar Hybrid (08-AFC-12)	106	774,000	5,899,500	640	0.17	1209	415
Avenal Energy (08-AFC-1)[2]	600	3,023,388	24,792,786	25	24.0	120,936	N/A

[1] Net energy output is reduced by natural gas-fired combined cycle proxy energy output; see **Efficiency Appendix A**.
[2] Example natural gas-fired combined cycle plant.

Building a solar power plant employing a different technology, such as the linear parabolic trough technology of the Ridgecrest Solar, Blythe Solar, or Palen Solar projects, would increase the solar land use efficiency of Calico Solar. Staff believes Calico Solar represents one of the least land use-efficient solar technologies proposed by the projects currently in the Energy Commission's licensing process.

Alternative Heat Rejection System

The Stirling engine that is the heart of the SunCatcher technology is cooled by an automotive-style cooling system. Waste engine heat is conducted via an enclosed cooling loop to a radiator that dumps the waste heat to the atmosphere. This is a dry cooling system; its only water consumption is that required to make up any unintended leakage from the system. Thus, staff believes the cooling technology selected for this project is the optimum possible.

Project Closure

According to Section 3.12 of the applicant's project description, the solar generating facility is expected to have a lifespan of up to 40 years. At any point during this time, temporary or permanent closure of the solar facility could occur. Temporary closure would be a result of necessary maintenance, hazardous weather conditions, or damage due to a natural disaster. Permanent closure would be result of damage that is beyond repair, adverse economic conditions, or other significant reasons.

Both temporary and permanent closures would require the applicant to submit to the CEC a contingency plan or a decommissioning plan, respectively. A contingency plan would be implemented to ensure compliance with applicable LORS, and appropriate shutdown procedures depending on the length of the cessation. A decommissioning plan would be implemented to ensure compliance with applicable LORS, removal of equipment and shutdown procedures, site restoration, potential decommissioning alternatives, and the costs and source of funds associated with decommissioning activities.

D.3.4.3 CEQA LEVEL OF SIGNIFICANCE

CEQA guidelines state that the environmental analysis "…shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy" (Title 14 CCR §15126.4[a][1]). Appendix F of the guidelines further suggests consideration of such factors as the project's energy requirements and energy use efficiency; its effects on local and regional energy supplies and energy resources; its requirements for additional energy supply capacity; its compliance with existing energy standards; and any alternatives that could reduce the wasteful, inefficient, and unnecessary consumption of energy (Title 14, CCR §15000 et seq., Appendix F).

The inefficient and unnecessary consumption of energy, in the form of non-renewable fuels such as natural gas and oil, constitutes an adverse environmental impact. An adverse impact can be considered significant if it results in:

- adverse effects on local and regional energy supplies and energy resources;
- a requirement for additional energy supply capacity;

- noncompliance with existing energy standards; or
- the wasteful, inefficient, and unnecessary consumption of fuel or energy.

D.3.5 REDUCED ACREAGE ALTERNATIVE

The Reduced Acreage alternative would essentially be a 275 MW solar facility located within the boundaries of Phase 2 of the proposed 850 MW project. This alternative and alternative locations of the transmission line, substation, laydown, and control facilities are shown in **Alternatives Figure 1**.

D.3.5.1 SETTING AND EXISTING CONDITIONS

The Reduced Acreage alternative would be a 275 MW solar facility within the Phase 2 boundaries of the proposed project.

D.3.5.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

Since the Reduced Acreage plant output would produce only 275 MW (32 percent of the proposed project's 850 MW), its impacts on the SCE grid would be proportionately less. Since the Reduced Acreage plant would produce 275 MW while occupying 2,300 acres (37 percent of the proposed project's 6,215 acres), its power-based land use efficiency would be 0.12 MW/acre, slightly lower than the proposed project and only about half as efficient as some other solar thermal technologies.

D.3.5.3 CEQA LEVEL OF SIGNIFICANCE

If the Reduced Acreage alternative were constructed, the CEQA Level of Significance, as measured by land use (occupied acreage), would amount to approximately 37 percent of the levels described for the proposed project. No conditions of certification would apply.

D.3.6 AVOIDANCE OF DONATED AND ACQUIRED LANDS ALTERNATIVE

Due to the reduction in project size and impacts associated with the northern portion of the originally proposed project layout, the Avoidance of Donated and Acquired Lands Alternative shown in **Alternatives Figure 2** will be addressed in the **Alternatives** section of this SSA.

D.3.6.1 CEQA LEVEL OF SIGNIFICANCE

The CEQA Level of Significance would not change from the levels described for the proposed project if this alternative were constructed. No condition of certification would apply.

D.3.7 NO PROJECT / NO ACTION ALTERNATIVE

D.3.7.1 NO PROJECT/NO ACTION ALTERNATIVE #1:

No Action on the Calico Solar Project application and on CDCA land use plan amendment

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM would not amend the CDCA Plan. As a result, no solar energy project would be constructed on the project site and BLM would continue to manage the site consistent with the existing land use designation in the CDCA Land Use Plan of 1980, as amended.

Because there would be no amendment to the CDCA Plan and no solar project approved for the site under this alternative, it is expected that the site would continue to remain in its existing condition, with no new structures or facilities constructed or operated on the site and no ground disturbance. The decreased reliance on fossil fuel and increased reliance on renewable energy resources that would occur with the proposed project would not occur. However, the land on which the project is proposed would become available to other uses that are consistent with BLM's land use plan, including another solar project requiring a land use plan amendment. In addition, in the absence of this project, other renewable energy projects may be constructed to meet State and Federal mandates, and those projects would have similar impacts in other locations

D.3.7.2 NO PROJECT/NO ACTION ALTERNATIVE #2:

No Action on the Calico Solar Project and amend the CDCA land use plan to make the area available for future solar development

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM and BLM would amend the CDCA Land Use Plan of 1980, as amended, to allow for other solar projects on the site. As a result, it is possible that another solar energy project could be constructed on the project site.

Because the CDCA Plan would be amended, it is possible that the site will be developed with another solar technology. Construction and operation requirements for solar technologies vary; however, they would all decrease reliance on fossil fuel, and would increase reliance on renewable energy resources as with the proposed project.

D.3.7.3 NO PROJECT/NO ACTION ALTERNATIVE #3:

No Action on the Calico Solar Project application and amend the CDCA land use plan to make the area unavailable for future solar development

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM and the BLM would amend the CDCA Plan to make the proposed site unavailable for future solar development. As a result, no solar energy project would be constructed on the project site and BLM would continue to manage the site consistent with the existing land use designation in the CDCA Land Use Plan of 1980, as amended.

Because the CDCA Plan would be amended so no solar projects can be approved for the site under this alternative, it is expected that the site would continue to remain in its existing condition, with no construction of a solar facility. Therefore, there would be no decreased reliance on fossil fuel and increased reliance on renewable energy resources as with the proposed project. However, in the absence of this project, other renewable energy projects may be constructed to meet State and Federal mandates, and those projects would have similar impacts in other locations.

D.3.8 PROJECT-RELATED FUTURE ACTIONS

Proposed upgrades to the SCE transmission system, known as the 275 MW Early Interconnection option and the 850 MW Full Build-Out option are considered to be reasonably foreseeable actions that would be contingent on construction of the proposed Calico Solar Project. The SCE upgrades would not impact the power plant efficiency of the proposed Calico Solar Project.

D.3.9 CUMULATIVE IMPACT ANALYSIS

There are no nearby power plant projects or other projects consuming large amounts of fossil fuel that hold the potential for cumulative energy consumption impacts when aggregated with the project.

Staff believes that the construction and operation of the project would not create indirect impacts (in the form of additional fuel consumption) that would not have otherwise occurred without this project. Because Calico Solar would consume no fossil fuel, it should compete favorably in the California power market and replace fossil fuel burning power plants. The project would therefore cause a positive impact on the cumulative amount of fossil fuel consumed for power generation.

D.3.10 COMPLIANCE WITH LORS

No federal, state, or local/county laws, ordinances, regulations, and standards (LORS) apply to the efficiency of this project.

D.3.11 NOTEWORTHY PUBLIC BENEFITS

The Calico Solar Project would employ an advanced solar thermal technology. Solar energy is renewable and unlimited. The project would have a less than significant adverse impact on nonrenewable energy resources (natural gas). Consequently, the project would help in reducing California's dependence on fossil fuel-fired power plants.

D.3.12 PROPOSED CONDITIONS OF CERTIFICATION/MITIGATION MEASURES

No conditions of certification are proposed.

D.3.13 CONCLUSIONS

Fossil Fuel Energy Use

The Calico Solar Project, if constructed and operated as proposed, would use solar energy to generate all of its capacity, consuming no natural gas for power production. The project would decrease reliance on fossil fuel, and would increase reliance on renewable energy resources. It would not create significant adverse effects on energy supplies or resources, would not require additional sources of energy supply, and would not consume energy in a wasteful or inefficient manner. No energy standards apply to this project. Staff therefore concludes that this project would present no significant adverse impacts on energy resources.

No cumulative impacts on energy resources are likely. Facility closure would not likely present significant impacts on electric system efficiency.

Land Use

The Calico Solar Project, if constructed and operated as proposed, would occupy approximately seven acres per MW of power output, a figure comparable to some other solar power technologies but higher than yet some other solar power technologies. Employing a less land-intensive solar technology, such as the linear parabolic trough technology of the Ridgecrest Solar, Blythe Solar, or Palen Solar projects, would increase the solar land use efficiency of Calico Solar. Calico Solar is more efficient in use of land than the Ivanpah Solar Electric Generating System project, which would employ BrightSource's power tower technology.

Staff believes Calico Solar represents one of the least land use-efficient solar technologies proposed by the projects currently in the Energy Commission's licensing process. Staff recognizes that the modular technology of the SunCatcher system allows the project to avoid environmental resource areas within the project boundaries, reducing the density of the SunCatcher units and likewise the land use efficiency. Nonetheless, larger project footprint per megawatt precludes other use of the land.

D.3.14 REFERENCES

CEC 2008c – Report of Conversation between Steve Baker and Golam Kibrya – CEC staff. February 22, 2008.

SES 2008a – Stirling Energy Systems/R. Liden (tn 49181). Application for Certification, dated December 1, 2008. Submitted to CEC/Docket Unit on December 1, 2008.

SES 2009e – Tessera Solar/ C. Champion (tn: 52466). Applicant's Responses to CEC and BLM Data Requests Set 1 Part 1. Dated 7/17/09. Submitted to CEC/Docket Unit on 7/20/09.

TS 2010ag - Stirling Energy Systems/F. Bellows (tn 57018). Applicant's Submittal of Alternative Site Layout #2, Engineering Figure with SunCatcher Layout, and Revised Project Boundary with 4,000-foot Tortoise Corridor Figure; dated June 2, 2010.

D.4 – POWER PLANT RELIABILITY

Testimony of Shahab Khoshmashrab

D.4.1 SUMMARY OF CONCLUSIONS

An expert familiar with the machines claims that the SunCatcher exhibits a Mean Time Between Failures (MTBF) of only 40 hours. It is believed by this expert that a MTBF of 2,000 to 10,000 hours must be proven before a technology is ready for incorporation into a utility grid (Butler 2007, Public 2009a; Conklin 2009).

Recently, the applicant provided a report to the energy commission, claiming an overall availability factor of 95.1 percent for the 1.5 Megawatt (MW) Maricopa Plant (a pilot plant using the Stirling Energy Systems SunCatcher units) during the period of March 16 to June 5, 2010 (TS 2010ai). (The availability factor of a power plant is the percentage of time it is available to generate power; both planned and unplanned outages subtract from this availability.) The proposed Calico Solar Project would be essentially a multiplication of the 60-unit Maricopa Plant with similar configuration. The Maricopa Plant has generated 833,738 kWh, representing a capacity factor of 26.7 percent. This represents several hundred hours of plant operation. The applicant claims that it has used lessons learned from the Maricopa Plant to incorporate engineering and maintenance improvements.

The applicant's data above demonstrates an encouraging first-step effort toward achieving a reliable technology. However, this data demonstrates an availability factor based on a limited number of operational hours. Had this technology represented an operational experience equivalent to that of a well-proven, commercial-scaled technology with thousands of hours of operational experience, such as the natural gas turbine technology, staff would have been confident in determining the availability factor. Therefore, at this time, staff cannot determine what the actual availability factor for the long-term operation of the Calico Solar Project would be, but it believes that with more operational experience we will have a better idea of the long-term availability factor of this technology.

Power Plant Reliability is not intended to address environmental impacts under CEQA.

D.4.2 INTRODUCTION

In this analysis, California Energy Commission (Energy Commission) staff addresses the reliability issues of the Calico Solar Project to determine if the power plant is likely to be built in accordance with typical industry norms for reliable power generation. Staff uses this norm as a benchmark because it ensures that the resulting project would not be likely to degrade the overall reliability of the electric system it serves (see the "Setting" subsection, below).

The scope of this power plant reliability analysis covers:

- equipment availability;
- plant maintainability;

- fuel and water availability; and
- power plant reliability in relation to natural hazards.

Staff examined the project design criteria to determine if the project is likely to be built in accordance with typical industry norms for reliable power generation. While the applicant has predicted an availability factor for the Calico Solar Project (see below), staff commonly uses typical industry norms as the benchmark, rather than the applicant's projection, to evaluate the project's reliability.

D.4.3 METHODOLOGY AND THRESHOLDS FOR DETERMINING ENVIRONMENTAL CONSEQUENCES

D.4.3.1 METHOD FOR DETERMINING RELIABILITY

The Energy Commission must make findings as to how a project is designed, sited, and operated in order to ensure its safe and reliable operation (Title 20, CCR §1752[c]). Staff takes the approach that a project is acceptable if it does not degrade the reliability of the utility system to which it is connected. This is likely the case if a project is at least as reliable as other power plants on that system.

The availability factor of a power plant is the percentage of time it is available to generate power; both planned and unplanned outages subtract from this availability. Measures of power plant reliability are based upon both the plant's actual ability to generate power when it is considered to be available and upon starting failures and unplanned (or forced) outages. For practical purposes, reliability can be considered a combination of these two industry measures, making a reliable power plant one that is available when called upon to operate. Power plant systems must be able to operate for extended periods without shutting down for maintenance or repairs. Achieving this reliability requires adequate levels of equipment availability, plant maintainability with scheduled maintenance outages, fuel and water availability, and resistance to natural hazards. Staff examines these factors for the project and compares them to industry norms. If the factors compare favorably for the project, staff may then conclude that the project would be as reliable as other power plants on the electric system and would not degrade system reliability.

D.4.4 PROPOSED PROJECT

D.4.4.1 SETTING AND EXISTING CONDITIONS

In the restructured competitive electric power industry, the responsibility for maintaining system reliability falls largely to the state's control area operators, such as the California Independent System Operator (California ISO), that purchase, dispatch, and sell electric power throughout the state. Determining how the California ISO and other control area operators would ensure system reliability has been an ongoing effort. Protocols have been developed and put in place that allow sufficient reliability to be maintained under the competitive market system. "Must-run" power purchase agreements and "participating generator" agreements are two mechanisms that have been employed to ensure an adequate supply of reliable power.

The California ISO's mechanisms to ensure adequate power plant reliability apparently were devised under the assumption that the individual power plants that compete to sell power into the system will each exhibit a level of reliability similar to that of power plants of past decades. Accordingly, staff has recommended that power plant owners continue to build and operate their projects to the level of reliability to which all in the industry are accustomed.

As part of its plan to provide needed reliability, the applicant proposes to operate the 850-megawatt (MW) (net power output) Calico Solar Project, a solar thermal power plant facility employing Stirling engine solar power technology. This project, using renewable solar energy, is intended to provide dependable power to the grid, generally during the hours of peak power consumption by Southern California Edison (SCE), the interconnecting utility. This project would help serve the need for renewable energy in California, as all its generated electricity would be produced by a reliable source of energy that is available during hot summer afternoons, when power is needed most.

D.4.4.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

Equipment Availability

Equipment availability would be ensured by adoption of appropriate quality assurance/quality control (QA/QC) programs during the design, procurement, construction, and operation of the plant and by providing for adequate maintenance and repair of the equipment and systems discussed below.

Quality Control Program

The applicant describes a QA/QC program (SES 2008a, AFC § 3.11.4) that is typical of the power industry. Equipment would be purchased from qualified suppliers based on technical and commercial evaluations. Suppliers' personnel, production capability, past performance, QA programs, and quality history would be evaluated. The project owner would perform receipt inspections, test components, and administer independent testing contracts. Staff expects that implementation of this program would result in typical reliability of design and construction. To ensure this implementation, staff has proposed appropriate conditions of certification in the section of this document entitled **FACILITY DESIGN**.

Plant Maintainability

Equipment Redundancy

The project, as proposed in the AFC, would be able to operate only when the sun is shining. Maintenance or repairs could be done when the plant is shut down at night. This would help to enhance the project's reliability. Also, the project would incorporate redundant pieces of those components that are most likely to require service or repair. In this case, this redundancy is inherent in the incorporation of 34,000 individual SunCatcher units. This would allow service or repair to be done either at night when the plant is shut down, or during the day, when the plant is in operation, since only those SunCatchers actually being serviced or repaired would be unavailable to generate power.

In addition to the inherent redundancy of many independent units, the applicant plans to provide an appropriate redundancy of function for the remainder of project, including electrical transformers, circuit breakers, and power conversion units (SES 2008a, AFC §§ 1.3, 3.4.5.2, 3.4.5.4, 3.11.2; Tables 3-1, 3-2; SES 2010h). Staff believes that this project's proposed equipment redundancy, coupled with its inherent redundancy of many independent units, would improve the project's operational reliability.

Maintenance Program

Equipment manufacturers provide maintenance recommendations for their products, and the applicant would base the project's maintenance program on those recommendations (SES 2008a, AFC § 3.11.1). Because the plant would operate only during the sunlight hours, planned maintenance outages could be performed during other hours, when the plant would not need to be in operation.

The applicant predicts that each machine will leak its entire inventory of hydrogen once a year, thus requiring constant replenishment of hydrogen. For this reason, the applicant proposes a hydrogen electrolyzer and piping system that uses electricity from the grid to convert water into hydrogen and oxygen, then compresses the hydrogen and pipes it to each of the 34,000 SunCatchers (SES 2009h from SES Solar Two Project proceedings).

In the AFC, the applicant indicated that it expects the proposed project to achieve an availability factor of 99 percent. The project is anticipated to operate at an annual capacity factor of approximately 25 percent (SES 2008a, AFC §§ 3.9.14, 3.11.1).

An expert familiar with the machines claims that the SunCatcher exhibits a Mean Time Between Failures (MTBF) of only 40 hours (Butler 2007). This means each machine, if operating continuously on long summer days, would need to be shut down and repaired approximately every three to five days, depending on expected average 8 to 12 hours operation in winter and summer, respectively. Shutting down and repairing several thousand SunCatchers each day would likely result in enormous maintenance demands and the project would likely face challenges in achieving the predicted availability factor. It is believed by this expert that a MTBF of 2,000 to 10,000 hours must be proven before a technology is ready for incorporation into a utility grid (Butler 2007, Public 2009a; Conklin 2009).

The applicant recently submitted to the Energy Commission a confidential report that shows the performance data for the Maricopa Plant, a 1.5 MW power plant employing 60 SunCatcher units similar to those proposed for the Calico Solar Project. In this report, the applicant reports an overall availability factor of 95.1 percent for the Maricopa Plant during the period of March 16, 2010 to June 5, 2010 (SES 2010h). The Maricopa Plant has generated 833,738 kWh, representing a capacity factor of 26.7 percent. This represents several hundred hours of plant operation. The applicant claims that it has used lessons learned from the Maricopa Plant to incorporate engineering and maintenance improvements.

The above data provided by the applicant demonstrates an encouraging first-step effort toward achieving a reliable technology. However, this data demonstrates an availability factor based on a limited number of operational hours. Had this technology represented

an operational experience equivalent to that of a well-proven, commercial-scaled technology with thousands of hours of operational experience, such as the natural gas turbine technology, staff would have been confident in determining the availability factor. Therefore, at this time, staff cannot determine what the actual availability factor for the long term operation of the Calico Solar Project would be, but it believes that with more operational experience and with continuously demonstrating a reliable and stable power plant technology, in the future one can be more decisive in determining the long-term availability factor of this technology.

Fuel and Water Availability

The long-term availability of fuel and water for cooling or process use may be necessary to ensure the reliability of any power plant, depending on the technology deployed.

Fuel Availability

The Calico Solar Project would consume no natural gas or other fossil fuel. Therefore, there is no likelihood that availability of natural gas would cause concern.

Water Supply Reliability

The Calico Solar Project would use water from a groundwater well located on private land adjacent to the project site for mirror washing, for potable and fire protection water, and in an electrolysis process to produce hydrogen gas to replenish the hydrogen that leaks from the Stirling engines (SES 2008a, AFC §§ 1.3, 1.4, 3.1.2, 3.5.6, 3.5.10, 3.7). The water will be pumped from the well, conveyed in an underground pipe to a water storage tank, treated and dispersed for onsite use. Since the Stirling engines are air-cooled, no water would be required for power plant cooling.

To ensure the well can provide an adequate water supply, Soil and Water Resources staff recommends the applicant be required to comply with Condition of Certification **SOIL&WATER-9** which requires a Water Conservation and Alternative Water Supply Plan, should groundwater monitoring indicate long-term downward trends in water levels and storage. With the implementation of this condition of certification, staff believes the water supply resource would be adequate for the project. For further discussion of water supply, see the **Soil and Water Resources** section of this document.

Power Plant Reliability in Relation to Natural Hazards

Natural forces can threaten the reliable operation of a power plant. Tsunamis (tidal waves) and seiches (waves in inland bodies of water) are not likely to present hazards for this project, but seismic shaking (earthquakes), flooding and high winds could present credible threats to the project's reliable operation (SES 2008a, AFC § 3.10.1).

Seismic Shaking

The site lies within a seismically active region; see the "Faulting and Seismicity" portion of the **GEOLOGY AND PALEONTOLOGY** section of this document. The project will be designed and constructed to the latest applicable LORS (SES 2008a, AFC § 3.10.1.1). Compliance with current seismic design LORS represents an upgrading of performance during seismic shaking compared to older facilities since these LORS have been

continually upgraded. Because it would be built to the latest seismic design LORS, this project would likely perform at least as well as, and perhaps better than, existing plants in the electric power system. Staff has proposed conditions of certification to ensure this; see the section of this document entitled **FACILITY DESIGN**. In light of the general historical performance of California power plants and the electrical system in seismic events, staff has no special concerns with the power plant's functional reliability during earthquakes.

Flooding

Portions of the site lie within the 100-year flood plain (SES 2008a, AFC §§ 3.10.1.4). Project features would be designed and built to provide adequate levels of flood resistance. Staff believes there are no special concerns with power plant functional reliability due to flooding. For further discussion, see **SOIL AND WATER RESOURCES** and **GEOLOGY AND PALEONTOLOGY**.

High Winds

High winds are common in the region of the site; project features would be built to withstand winds over 90 miles per hour. Design would be in accordance with applicable LORS, including the 2007 California Building Code (SES 2008a, AFC § 3.10.1.2). Staff believes there are no special concerns with power plant functional reliability due to wind.

Comparison with Existing Facilities

The North American Electric Reliability Corporation (NERC) maintains industry statistics for availability factors (as well as other related reliability data). The NERC regularly polls North American utility companies on their project reliability through its Generating Availability Data System and periodically summarizes and publishes those statistics on the Internet at <http://www.nerc.com>. Energy Commission staff typically compares the applicant's claims for reliability to the statistical reliability of similar power plants. Because solar technology is relatively new and the technologies employed so varied, no NERC statistics are available for solar power plants. Staff's typical comparison with other existing facilities thus cannot be accomplished. For further discussions related to this topic, please see the above analysis in **Maintenance Program**.

D.4.4.3 CEQA LEVEL OF SIGNIFICANCE

This does not apply to power plant reliability.

D.4.5 REDUCED ACREAGE ALTERNATIVE

The Reduced Acreage alternative would essentially be a 275 MW solar facility located within the central portion of the proposed 850 MW project. It was developed because it can be constructed. This alternative's boundaries and the revised locations of the transmission line, substation, laydown, and control facilities are shown in **Alternatives Figure 1**.

D.4.5.1 SETTING AND EXISTING CONDITIONS

The Reduced Acreage alternative would be a 275 MW solar facility within the Phase 2 boundaries of the proposed project.

D.4.5.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

Since the Reduced Acreage plant output would produce only 275 MW (32% of the proposed project's 850 MW), its impacts on the SCE grid would be proportionately less.

D.4.5.3 CEQA LEVEL OF SIGNIFICANCE

This does not apply to power plant reliability.

D.4.6 AVOIDANCE OF DONATED AND ACQUIRED LANDS ALTERNATIVE

Due to the reduction in project size and impacts associated with the northern portion of the originally proposed project layout, the Avoidance of Donated and Acquired Lands Alternative shown in **Alternatives Figure 2** will be addressed in the **Alternatives** section of this SSA.

D.4.7 NO PROJECT / NO ACTION ALTERNATIVE

D.4.7.1 NO PROJECT/NO ACTION ALTERNATIVE #1

No Action on the Calico Solar Project application and on CDCA land use plan amendment

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM would not amend the CDCA Plan. As a result, no solar energy project would be constructed on the project site and BLM would continue to manage the site consistent with the existing land use designation in the CDCA Land Use Plan of 1980, as amended.

Because there would be no amendment to the CDCA Plan and no solar project approved for the site under this alternative, it is expected that the site would continue to remain in its existing condition, with no new structures or facilities constructed or operated on the site and no ground disturbance. As a result, the power generation benefits of the proposed project would not occur. However, the land on which the project is proposed would become available to other uses that are consistent with BLM's land use plan, including another solar project requiring a land use plan amendment. In addition, in the absence of this project, other renewable energy projects may be constructed to meet State and Federal mandates.

D.4.7.2 NO PROJECT/NO ACTION ALTERNATIVE #2

No Action on the Calico Solar Project and amend the CDCA land use plan to make the area available for future solar development

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM and BLM would amend the CDCA Land Use Plan of 1980, as amended, to allow for other solar projects on the site. As a result, it is possible that another solar energy project could be constructed on the project site.

Because the CDCA Plan would be amended, it is possible that the site will be developed with another solar technology. It is expected that the solar technology would be built in accordance with typical industry norms for reliable power generation.

D.4.7.3 NO PROJECT/NO ACTION ALTERNATIVE #3

No Action on the Calico Solar Project application and amend the CDCA land use plan to make the area unavailable for future solar development

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM and the BLM would amend the CDCA Plan to make the proposed site unavailable for future solar development. As a result, no solar energy project would be constructed on the project site and BLM would continue to manage the site consistent with the existing land use designation in the CDCA Land Use Plan of 1980, as amended.

Because the CDCA Plan would be amended so no solar projects can be approved for the site under this alternative, it is expected that the site would continue to remain in its existing condition, with no construction of a solar facility. Therefore, no benefits resulting from additional power generation would occur with this alternative. However, in the absence of this project, other renewable energy projects may be constructed to meet State and Federal mandates.

D.4.8 PROJECT-RELATED FUTURE ACTIONS

Proposed upgrades to the SCE transmission system, known as the 275 MW Early Interconnection option and the 850 MW Full Build-Out option are considered to be reasonably foreseeable actions that would be contingent on construction of the proposed Calico Solar Project. The SCE upgrades would not impact the reliability of the proposed Calico Solar Project, and therefore, no further additional analysis of reliability is required.

D.4.9 COMPLIANCE WITH LORS

No federal, state, or local/county laws, ordinances, regulations, or standards (LORS) apply to the reliability of this project.

D.4.10 NOTEWORTHY PUBLIC BENEFITS

This project, if successful, would help serve the need for renewable energy in California, as all of the electricity generated would be produced by a reliable source of energy (the sunlight) that is available during the hot summer afternoons, when power is needed most.

D.4.11 PROPOSED CONDITIONS OF CERTIFICATION/MITIGATION MEASURES

No conditions of certification are proposed.

D.4.12 CONCLUSIONS

An expert familiar with the machines claims that the SunCatcher exhibits a Mean Time Between Failures (MTBF) of only 40 hours. It is believed by this expert that a MTBF of 2,000 to 10,000 hours must be proven before a technology is ready for incorporation into a utility grid (Butler 2007, Public 2009a; Conklin 2009).

Recently, the applicant provided a report to the energy commission, claiming an overall availability factor of 95.1 percent for the 1.5 Megawatt (MW) Maricopa Plant (a pilot plant using the Stirling Energy Systems SunCatcher units) during the period of March 16 to June 5, 2010 (SES 2010h). The proposed Calico Solar Project would be essentially a multiplication of the 60-unit Maricopa Plant with similar configuration. The Maricopa Plant has generated 833,738 kWh, representing a capacity factor of 26.7 percent. This represents several hundred hours of plant operation. The applicant claims that it has used lessons learned from the Maricopa Plant to incorporate engineering and maintenance improvements.

The applicant's data above demonstrates an encouraging first-step effort toward achieving a reliable technology. However, this data demonstrates an availability factor based on a limited number of operational hours. Had this technology represented an operational experience equivalent to that of a well-proven, commercial-scaled technology with thousands of hours of operational experience, such as the natural gas turbine technology, staff would have been confident in determining the availability factor. Therefore, at this time, staff cannot determine what the actual availability factor for the long term operation of the Calico Solar Project would be, but it believes that with more operational experience we will have a better idea of the long-term availability factor of this technology.

D.4.13 REFERENCES

Ayers, C. 2009 – Letter to Christopher Meyer, CEC staff, from Charlene Ayers, January 2, 2009.

CEC 2007 – California Energy Demand 2008-2018 Staff Revised Forecast, CEC-200-2007-015-SF2, November 2007; p. 122, Table 22.

CEM 2008 – California Energy Markets, No. 963, February 15, 2008, pp. 1, 11-12.

Conklin 2009 – Letter to Christopher Meyer, CEC staff, from Diane Conklin, Mussey Grade Road Alliance, January 2, 2009.

McGraw-Hill 1994 – McGraw-Hill Energy Information Services Group. 1994. Operational Experience in Competitive Electric Generation. Executive Report.

SES 2008a – Stirling Energy Systems/R. Liden (tn 49181). Application for Certification, dated December 1, 2008. Submitted to CEC/Docket Unit on December 1, 2008.

SES 2010h – Applicant's CONFIDENTIAL Submittal of the Maricopa Solar Engineer's Report, Dated June 11, 2010.

TS 2010ai - Tessera Solar/ F. Bellows (tn 57306). Applicant's Application for Confidential Designation – Excerpt of Tessera Solar's Independent Engineer's Performance Report, dated June 11, 2010. Submitted to CEC/Docket Unit on June 11, 2010.

D.5 – TRANSMISSION SYSTEM ENGINEERING

Testimony of Sudath Edirisuriya and Mark Hesters

D.5.1 SUMMARY OF CONCLUSIONS

The proposed Calico Solar Project (formerly the Stirling Energy Systems Solar One Project) outlet lines and termination are acceptable and would comply with all applicable laws, ordinances, regulations, and standards. The analysis of project transmission lines and equipment, both from the power plant up to the point of interconnection with the existing transmission network as well as upgrades beyond the interconnection that are attributable to the project have been evaluated by California Energy Commission and U.S. Bureau of Land Management staff and are included in the environmental sections of this Supplemental Staff Assessment (SSA).

Staff concludes that mitigation of thermal overloads caused by the Calico Solar Project under the Base case and N-1 conditions would require the following facilities:

- Expand Southern California Edison's existing Pisgah 230 kV interconnection facility and install a new 2,240 MVA, 500/230 kV substation with two 1,120 MVA transformer banks. The expansion of the existing Pisgah 230 kV substation requires California CEQA/NEPA analysis.
- Loop the existing Eldorado-Lugo 500 kV transmission line into the expanded Pisgah substation forming the Eldorado-Pisgah and Lugo-Pisgah No. 1 500 kV transmission lines.
- Install a new Lugo-Pisgah No. 2 500 kV transmission line by removing the existing Lugo-Pisgah No. 2 230 kV transmission line, widening the existing Right-of-Way (ROW) where needed and constructing the new 500 kV structures within the vacated ROW. The widening the existing ROW would require CEQA/NEPA analysis.
- Additionally, a Special Protection System (SPS) will be required to trip the proposed project to mitigate the thermal overloads caused by the N-1 emergency condition.
- The proposed Calico Solar Project should be designed and constructed with adequate reactive power resources to compensate the consumption of Var by the generator step-up transformers, distribution feeders and generator tie-lines.

D.5.2 INTRODUCTION

D.5.2.1 STAFF ANALYSIS

This transmission system engineering (TSE) analysis examines whether this project's proposed interconnection conforms to all laws, ordinances, regulations, and standards (LORS) required for safe and reliable electric power transmission. Additionally, under CEQA, the Energy Commission must conduct an environmental review of the "whole of the action," which may include facilities not licensed by the Energy Commission (Title 14, California Code of Regulations Section 15378). The Energy Commission must, therefore, identify the system impacts and necessary new or modified transmission facilities

downstream of the proposed interconnection that are required for interconnection and that, when included with the other project features, represent the whole of the action.

Commission staff relies on the responsible interconnecting authority for analysis of impacts on the transmission grid, as well as for the identification and approval of new or modified facilities required downstream from a proposed interconnection for mitigation purposes. The proposed Calico Solar Project would connect to Southern California Edison's (SCE's) existing 230-kV transmission network and would require both analysis by SCE and the approval of the California Independent System Operator (California ISO).

D.5.2.2 SCE'S ROLE

SCE is responsible for ensuring electric system reliability in its service territory for proposed transmission modifications. For the proposed Calico Solar Project, SCE performed a System Impact Study (SIS) used to determine whether or not the proposed transmission modifications needed for the proposed Calico Solar Project conform to reliability standards. Because the project would be connected to the California ISO controlled transmission grid, the California ISO's role is to review and approve the SIS and its conclusions.

D.5.2.3 CALIFORNIA ISO'S ROLE

The California ISO is responsible for ensuring electric system reliability for all participating transmission owners and for developing the standards to achieve system reliability. The power generated by the proposed Calico Solar Project will be dispatched to the California ISO grid via SCE's existing Pisgah 230-kV Substation. Therefore, the California ISO will review the studies of the SCE system to ensure adequacy of the proposed transmission interconnection. The California ISO determines the reliability impacts of proposed transmission modifications on the SCE transmission system in accordance with all applicable reliability criteria. According to the California ISO tariffs, the California ISO will determine the need for transmission additions or upgrades downstream from the interconnection point to insure reliability of the transmission grid.

The California ISO reviewed the SIS prepared by SCE for the proposed Calico Solar Project and issued a preliminary approval to SCE. On completion of the SCE Facility Study, the California ISO will review the study results and provide its conclusions and recommendations. The California ISO may provide written and verbal testimony on its findings at the Energy Commission hearings.

D.5.2.4 LAWS, ORDINANCES, REGULATIONS, AND STANDARDS

The LORS that apply to the transmission facilities associated with the proposed Calico Solar Project are:

- California Public Utilities Commission (CPUC) General Order 95 (GO-95), *Rules for Overhead Electric Line Construction*, sets forth uniform requirements for the construction of overhead lines. Compliance with this Order ensures adequate service and the safety of the public and the people who build, maintain, and operate overhead electric lines.

- CPUC General Order 128 (GO-128), *Rules for Construction of Underground Electric Supply and Communications Systems*, sets forth uniform requirements and minimum standards for underground supply systems to ensure adequate service and the safety of the public and the people who build, maintain, and operate underground electric lines.
- The National Electric Safety Code, 1999, provides electrical, mechanical, civil, and structural requirements for overhead electric line construction and operation.
- The combined North American Electric Reliability Corporation/Western Electricity Coordinating Council (NERC/WECC) planning standards provide system performance standards for assessing the reliability of the interconnected transmission system. These standards require continuity of service and the preservation of interconnected operation as the first and second priorities, respectively. Some aspects of NERC/WECC standards are either more stringent or more specific than the either agency's standards alone. These standards are designed to ensure that transmission systems can withstand both forced and maintenance outage system contingencies while operating reliably within equipment and electric system thermal, voltage, and stability limits. These standards include reliability criteria for system adequacy and security, system modeling data requirements, system protection and control, and system restoration. Analysis of the WECC system is based to a large degree on Section I.A of WECC standards, *NERC and WECC Planning Standards with Table I and WECC Disturbance-Performance Table,* and on Section I.D, *NERC and WECC Standards for Voltage Support and Reactive Power.* These standards require that power flows and stability simulations verify defined performance levels. Performance levels are defined by specifying allowable variations in thermal loading, voltage and frequency, and loss of load that may occur during various disturbances. Performance levels range from no substantial adverse effects inside and outside a system area during a minor disturbance (such as the loss of load from a single transmission element) to a catastrophic loss level designed to prevent system cascading and the subsequent blackout of islanded areas and millions of consumers during a major transmission disturbance (such as the loss of multiple 500-kV lines along a common right-of- way, and/or of multiple large generators). While the controlled loss of generation or system separation is permitted under certain specific circumstances, a major uncontrolled loss is not permitted (WECC, 2002).
- NERC's reliability standards for North America's electric transmission system spell out the national policies, standards, principles, and guidelines that ensure the adequacy and security of the nation's transmission system. These reliability standards provide for system performance levels under both normal and contingency conditions. While these standards are similar to the combined NERC/WECC standards, certain aspects of the combined standards are either more stringent or more specific than the NERC performance standards alone. NERC's reliability standards apply to both interconnected system operations and to individual service areas (NERC, 2006).
- California ISO planning standards provide the standards and guidelines that ensure the adequacy, security, and reliability of the state's member grid facilities. These standards incorporate the combined NERC/WECC and NERC standards. These standards are also similar to the NERC/WECC or NERC standards for transmission system contingency performance. However, the California ISO standards provide additional requirements not included in the WECC/NERC or NERC standards. The

California ISO standards apply to all participating transmission owners interconnecting to the California ISO-controlled grid. They also apply to non-member facilities that impact the California ISO grid through their interconnections with adjacent control grids (California ISO, 2002a).

- California ISO/Federal Energy Regulatory Commission (FERC) electricity tariffs contain guidelines for building all transmission additions/upgrades within the California ISO-controlled grid. (California ISO, 2003a).

D.5.3 PROPOSED PROJECT

D.5.3.1 SETTING AND EXISTING CONDITIONS

The applicant proposes to interconnect the proposed 850 megawatt (MW) Calico Solar Project to SCE's existing Pisgah 230 kV Substation which is located in San Bernardino County approximately 35 miles east of Barstow, California. The proposed project would be developed in two phases, one 275 MW phase (Calico Solar Project Phase 1), and one 575 MW phase (Calico Solar Project Phase 2), with a net output of 850MW.

The Calico Solar Project is a solar concentrating thermal power plant, based on the proprietary SunCatcher technology of Sterling Energy System, Inc. Each SunCatcher consists of a 25-kilowatt (kW) solar power generating system. The system is designed to track the sun automatically and to focus solar energy onto a power conversion unit (PCU), which generates electricity. Each SunCatcher consists of a 38-foot high by 40-foot wide solar concentrator in a dish structure that supports an array of curved glass mirror facets. These mirrors collect and concentrate solar energy onto the solar receiver of the PCU. Both phases of the project will consist of a total of approximately 34,000 SunCatchers. Each SunCatcher will produce 575 volts alternating current. The project will be electrically designed to 575V, 1.5 MW, three phase, 60Hz solar groups. Each complete solar group will consist of 60 SunCatchers, which correlates to a 1.5 MW power block with a corresponding GSU transformer. The 1750 KVA GSU transformer will step up the 575 volt (V) collector feeder voltage to 34.5 kV. The 1.5 MW solar groups will be connected by underground electrical cables to create the 3, 6 and 9 MW solar groups. Five 9 MW groups and one 3 MW group will be coupled through underground 4/0 aluminum electrical cables and ascend through a pole riser to create an overhead 48MW distribution collector line. Five 9 MW groups and one 6 MW group will be coupled through underground 4/0 aluminum electrical cables and ascend through a pole riser to create an overhead 51MW distribution collector line. The overhead collector groups will deliver the solar electric generated power to a new 850MW substation constructed on the site as part of the project. (SES Solar One, 2007c, Section 3.4, pages 3-27 to 3-32 and Figure 3-1 to 3-45,

Switchyard and Interconnection Facilities

The applicant will build a 34.5 kV to 230 kV 850 MW substation on the project site. The substation will consist of six segments of 34.5 kV open air bus with each bus segment consist of five 1200A **,** 35 kV collection feeder circuit breakers. One 48 MW and two 51 MW overhead collection lines will be connected to the each six 34.5 kV bus segments via circuit breakers. Additionally, two 35 kV circuit breakers in each segment will connect to power factor correction 45 MVar capacitor banks in the substation yard. For

Phase 1 of the project, the first interconnection substation will initially consist of four power transformers rated at 100/133/167 MVA each to convert the generation collection voltage from 34.5 kV to the transmission tie voltage of 230 kV. The substation will ultimately contain six 100/133/167 MVA, 34.5 kV to 230 kV step up transformers. Each power transformer will serve 3 of the 15 overhead collection lines. The high side of each step up transformer will be connected to the 230 kV bus segments via 2000A, 230 kV circuit breakers. One common bus for each phase will be formed by connecting the 230 kV bus segments through 2000A disconnect switches.

An approximately, 2 mile long 230 kV single circuit will be used to interconnect the 850 MW Calico Solar Project substation to the Pisgah Substation. The single circuit of the overhead 230 kV transmission line will be constructed with one 1590 kcmil per phase, aluminum conductor steel-reinforced (ACSR) conductor per line; each thermally rated to carry full project output in emergency conditions. Each circuit of the overhead line begins at a dead-end structure in the Calico Solar Project substation, continues east and parallel to the BNSF railroad ROW, and south crossing the BNSF railroad to a point where the line turns east leaving the site and undercrossing three SCE transmission lines before it finally enters the SCE Pisgah substation from the south. The transmission lines will start within the project site boundary but a 0.14 mile long segment from the project site to the Pisgah Substation will be outside the project site boundary. The off-site portion of the 230 kV interconnect transmission line will be routed under existing SCE transmission lines. Construction of that line will include dead-end structures in the substation and 12 to 15 230 kV lattice steel towers and/ or tubular steel poles and new 1590 kcmil ACSR conductors for each phase of the circuit.

Furthermore, SCE has proposed expanding and upgrading the existing 230 kV SCE Pisgah substation to a 230/500 kV substation, increasing the voltage to 500 kV, looping the Eldorado-Lugo 500 kV line into the SCE Pisgah substation and upgrading 65 miles of the existing Lugo-Pisgah number two 230 kV transmission line to 500 kV. The SCE Pisgah substation work includes installation of a new double Breaker 230 kV line position to terminate the new Calico Solar Project 230 kV Gen Tie Line, install Motorized disconnect switches at each one of the existing Lugo No. 1 and No. 2 230 kV line positions, and install SPS relays. (SES Solar One, LGIP Optional Interconnection Study, Section 3.6 pages 3.27 to 3.30, and Figures 3-5, 3-6, and 3-7)

D.5.3.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

For the interconnection of this proposed project to the grid, the interconnecting utility (SCE) and the control area operator (California ISO) are responsible for ensuring grid reliability. These two entities will assess the potential impacts of the proposed Calico Solar Project on the transmission system and any mitigation measures needed to ensure system conformance with the applicable utility reliability criteria, NERC planning standards, WECC reliability criteria, and California ISO reliability criteria. System impact and facilities studies are used to determine the impacts of the proposed Calico Solar Project on the transmission grid. Staff relies on these studies and any review conducted by the California ISO to determine the potential effects of the proposed Calico Solar Project on the transmission grid and to identify any necessary downstream facilities or indirect project impacts required to bring the transmission network into compliance with

applicable reliability standards. System impact and facilities studies analyze the grid with and without the proposed Calico Solar Project, under conditions specified in the planning standards and reliability criteria. The standards and criteria define the assumptions used in the study and establish the thresholds through which grid reliability is determined. The studies analyze the potential impact of the proposed Calico Solar Project for the anticipated first year of operation, and are based on a forecast of loads, generation, and transmission. Load forecasts are developed by the interconnected utility. Generation and transmission forecasts are established by an interconnection queue. The studies focus on thermal overloads, voltage deviations, system stability (excessive oscillations in generators and transmission system, voltage collapse, loss of loads, or cascading outages), and short circuit current. If the studies show that the interconnection of the project causes the grid to be out of compliance with the reliability standards, then the study will identify mitigation measures or ways in which the grid could be brought into compliance with the reliability standards.

When a project connects to the California ISO-controlled grid, both the studies and mitigation measures must be reviewed and approved by the California ISO. If either the California ISO or interconnecting utility determines that the only feasible mitigation includes transmission modifications or additions requiring CEQA review, the Energy Commission must analyze those modifications or additions according to CEQA requirements.

D.5.3.3 SCOPE OF SYSTEM IMPACT STUDIES

The System Impact Studies (SIS) were performed by SCE at the request of the applicant to identify the potential impacts of the proposed Calico Solar Project on SCE's 69/115/230 kV transmission system. The SIS included power flow, sensitivity, and short circuit studies and transient and post-transient analyses (SES Solar One, Phase 1 and Phase 2-2006a SIS). The SIS modeled the proposed project for a net output of 850 MW. The base cases included all California ISO approved major SCE transmission projects, and major path flow limits of Southern California Import Transmission (SCIT), East-Of-River, West-of-River and upgraded 115 kV phase shifting transformer at Inyo substation. The SIS considered light load conditions with generation patterns and SCIT imports maximized to identify the extent of potential congestion and to fully stress the SCE system in the area where the project phases of the proposed Calico Solar Project would be interconnected. The study assumptions are described in further detail in the SIS. The power flow studies were conducted with and without Calico Solar connected to SCE's grid at the existing Pisgah Substation, using 2009 heavy summer and 2009 light spring base cases. The power flow study assessed the potential impacts of the proposed Calico Solar Project on thermal loading of the transmission lines and equipment. Transient and post-transient studies were conducted for Phases 1 and 2 of the proposed Calico Solar Project using the 2009 heavy summer base case to determine whether the project would create instability in the system following certain selected outages. Short circuit studies were conducted to determine if Phases 1 and 2 of the proposed Calico Solar Project would overstress existing substation facilities.

<u>Pre-Project Upgrade Requirements</u>

The upgrades included below are those facilities that are required to mitigate reliability violations caused by higher-queued projects, placed ahead of the project in the

generator interconnection queue, and are expected to be implemented by those higher-queued projects. However, in the event that any of these higher-queued projects withdraw their application, the Calico Solar Project may become responsible for any or all of these additional facilities.

- Upgrade of the Inyo 115 kV Phase-Shift transformer: The upgrade involves replacement of the phase-shift transformer at Inyo with a new one that has greater phase-shift capability.
- Inyokern substation conversion to 230 kV: The facility upgrades involve a new Inyokern 230 kV substation and utilization of existing 230 kV transmission facilities.
- New Lugo-Kramer Transmission Line project: The facility involves the construction of a new Kramer-Lugo 230 kV transmission line.
- Construction of a third Lugo 500/230 kV Transformer Bank.
- Mountain Pass-El Dorado 115 kV line reconductor.
- El Dorado 230/115 kV transformer Bank – The facility involves replacing existing 230/115 kV transformer bank with a larger size.

Power Flow Study Results with Pre-Project Upgrades

Normal (N-0) Overloads

With the addition of the Calico Solar Project, the study identified two 230 kV transmission lines and two 500/230 kV transformer banks with base case overloads during heavy summer and Light spring load conditions. Sensitivity studies were conducted to identify the Calico Solar Project level that would mitigate thermal overloads on the Lugo-Pisgah 230 kV transmission lines. The study found that if Calico Solar Project output was reduced to 687MW and 750MW for heavy summer and light spring load conditions there would be no thermal overloads on the Lugo-Pisgah 230 kV lines. However, the reduction in generation does not mitigate the thermal overloads identified on the Lugo No. 1 and Lugo No. 2 500/230 kV transformer banks. To mitigate the thermal overloads on the transformer banks the Calico Solar Project generation output should be reduced to 300MW and 150MW for heavy summer and light spring load conditions.

Overloads:

- Lugo-Pisgah No. 2 230 kV transmission line was 112% overloaded under the heavy summer and light spring Base case conditions.
- Lugo-Pisgah No. 1 230 kV transmission line was 111% overloaded under the heavy summer and light spring Base case conditions.
- Lugo No. 1 500/230 kV transformer bank was 103% overloaded under the heavy summer and light spring Base case conditions.
- Lugo No. 2 500/230 kV transformer bank was 104% overloaded under the heavy summer and light spring Base case conditions.

Mitigation:

- The recommended mitigation strategy is to expand the existing Pisgah 230 kV interconnection facility and install a new 2240MVA 500/230 kV substation with two 1120MVA transformer banks.
- Loop the existing Eldorado-Lugo 500 kV transmission line into the expanded Pisgah substation and form the two new Eldorado-Pisgah and Lugo-Pisgah No. 1 500 kV transmission lines.
- Install a new Lugo-Pisgah No. 2 500 kV transmission line by removing the existing Lugo-Pisgah No. 2 230 kV transmission line, widening the existing Right-of-Way where needed and constructing the new 500 kV structures within the vacated ROW

Single Outage Contingency (N-1 or T-1)

With the addition of the Calico Solar Project, the study identified one 230 kV transmission line and one 500/230 kV transformer bank overload under the N-1 or T-1 contingency analysis during the heavy summer and light spring load conditions.

Overload:

- One Lugo-Pisgah 230 kV transmission line was overloaded approximately 147% above the pre-project ratings, during the outage of the other Lugo-Pisgah 230 kV transmission line under the heavy summer and light spring N-1 conditions.
- One Lugo 500/230 kV transformer was overloaded approximately 56% above the pre-project ratings, during the outage of the other Lugo 500/230 kV transformer bank, under the heavy summer and light spring N-1 conditions.

Mitigation:

- With the output of the Calico Solar Project reduced to 300MW and 150MW for heavy summer and light spring load conditions, there are no thermal overloads of the Lugo 500/230 kV transformer banks. Additionally, a Special Protection System (SPS) will be required to trip off the Calico Solar Project to mitigate the thermal overloads caused by the N-1 condition.
- To support the required SPS the replacement of a portion of existing Eldorado-Lugo 500 kV Over Head Ground Wire (OHGW) with new Optical Ground Wire) OPGW between the Lugo and Pisgah substations.
- Replacement of a portion of existing OHGW with OPGW on the existing Eldorado-Lugo 500 kV transmission line between the Lugo and Pisgah substations.
- Installment of new Fiber Cable coupled with use of existing Microwave.

Double Outage Contingency (N-2 or N-1 and T-1)

The study identified that power flows do not converge under loss of both Lugo-Pisgah 230 kV or loss of both Pisgah-El Dorado 230 kV lines. These study results are indicative of a potential voltage collapse. Since the existing system cannot support the entire project output with all facilities in service, the results under loss of two transmission lines were not closely evaluated for the existing system arrangement.

Power Flow Study Results with 230 kV to 500 kV Lugo to Pisgah Conversion

The study results obtained from the power flow study with pre-project upgrades modeled to mitigate base case overload problems triggered by queued ahead projects are insufficient to accommodate the Calico Solar Project. As a result, facility upgrades will be needed to interconnect and deliver the full output of the Calico Solar Project. The following presents the power flow study results with the upgrades:

Normal Condition (N-0):

With all pre-project upgrades and the first set of Calico Solar Project upgrades included into the study cases, the base case overloads identified on both Lugo-Pisgah 230 kV transmission lines and both Lugo 500/230 kV transformer banks were eliminated.

Single Outage Contingency (N-1 and T-1):

With the first set of facility upgrades modeled, the study identified two single outage contingencies that resulted in a case non-convergence due to insufficient Var support of the system. Loss of the new Lugo Pisgah 500 kV transmission line or loss of the single Pisgah 500/230 kV transformer bank results in a possible voltage collapse problem. Under the two outage conditions, there is insufficient capacity to transfer the entire Calico Solar Project output, even if the voltage problem were resolved as the two remaining 230 kV lines in service from Pisgah can only carry approximately 575MVA. With the final set of facility upgrades modeled, no single outage contingency problems were identified.

Transient Study Results

The Transient Study was conducted for the critical single and double contingencies affecting the area on the page 18, table 1-8 and 1-9 in the Calico Solar Project (Phases 1 and 2) SIS. The three-phase faults with normal clearing are studied for single contingencies; single-line-to-ground faults with delayed clearing are studied for double contingencies. All outage cases were evaluated with the assumption that existing SPS or Remedial Action Schemes (RAS) would operate as designed where required. The Transient Studies concluded that the existing Kramer RAS and High Desert Power Project (HDPP) RAS operating as designed where required and the new SPS proposed for this project there are no additional upgrades to the SCE system required. However, the project will need to provide 300MVAR of dynamic reactive support. (Final Interconnection Facilities Study Report, Page 5, June 13, 2008)

Post-Transient Study Results

The NERC/WECC planning standards require that the system maintain post-transient voltage stability when either critical path transfers or area loads increase by 5 percent for Category B contingencies, and 2.5 percent for Category C contingencies. Post-transient studies conducted for similar or larger generators in the area concluded that voltage remains stable under both N-1 and N-2 contingencies. All outage cases were evaluated with the assumption that existing SPS or RAS would operate as designed where required. The studies determined that the system remained stable with the proposed upgrades in place under both single and double contingency outage conditions and the addition of Phases 1 and 2 of the proposed Calico Solar Project

would not trigger any new post-transient criteria violations. (Final Interconnection Facilities Study Report, Page 5, June 13, 2008)

Short-Circuit Duty Study Results

Short circuit studies were performed to determine the degree to which the addition of the power generated by the Calico Solar Project increases fault duties at SCE substations, and other 69 kV, 115 kV, 230 kV, and 500 kV busses in the study area. The busses at which faults were simulated, the maximum three-phase and single-line-to-ground fault currents at these busses both with and without the project, and information on the breaker duties at each location are summarized in the Short Circuit Study results tables in the SIS (SES Solar One, Table 2-6,Page 30 –SIS and Final Interconnection Facilities Study Report -Page 5).

The results of the three-phase-to-ground and single-phase-to-ground short-circuit duty studies identified six 500 kV, nineteen 230 kV, and three 66 kV substation locations where the project causes the Three Phase and or the Single Phase to Ground short circuit duties to increase by 0.1 kA or more and required further evaluation. The Circuit Breaker evaluations concluded that the project does not trigger any Circuit Breaker replacements or upgrades but aggravates pre-project conditions that require fifteen replacements and seventeen upgrades of 230 kV Circuit breakers at the Etiwanda generation station 230 kV switchyard and Mira Loma substation. The increased Short Circuit Duty at Mira Loma substation also requires that the 230 kV switchyard be upgraded to 80 kA ratings. (Final interconnection Facilities Study Report, Page 5, November 6, 2008)

Reactive Power Deficiency Analysis Results

The addition of the Calico Solar Project adversely impacts SCE's ability to maintain schedule voltages if power factor correction is not placed at strategic locations. For generation levels ranging up to 400MW, the amount of Calico Solar Project uncompensated reactive demands vary between 0 and 350MVar. Of the 350MVar reactive demands, approximately 260 MVar are associated with the reactive loads at 0.84 Power Factor and the remaining 90 MVar are associated with transformation and local distribution collector losses. Without Power Factor correction, the reactive requirements are transmitted from other generation resources. Such transmission of reactive power can potentially result in voltage collapse conditions. This condition was identified for the Calico Solar Project when generation levels exceed 400MW under normal operating conditions, 325 MW under loss of one transmission line, and 200 MW under loss of two transmission lines. Power Factor correction devices such as shunt capacitor banks, substation capacitor banks or other reactive resource devices should be located where they are needed, within the Calico Solar Project.

Optional Interconnection Study (275MW)

On January, 2008 the applicant requested that SCE determine the impacts of a 275 MW on the SCE system. The study revealed that a maximum of 275MW generation could be interconnected to the existing Pisgah 230 kV Bus and related 230 kV system contingent on the installation of a new Special Protection Scheme (SPS) that would trip-off the generation under certain contingencies. The 275MW interconnection would be a

temporary Interconnection until the 500 kV System Upgrades are on line and the full 850MW generation is connected to the upgraded system.

Power Flow Study Results:

Although the project does not trigger any Base case overloads it requires a new SPS to eliminate single contingency (N-1) overloads as follows:

Overload:

- Lugo-Pisgah No. 1 230 kV transmission line was 115% overloaded under the outage of the Lugo-Pisgah No. 2 230 kV transmission line.
- Lugo-Pisgah No. 2 230 kV transmission line was 115% overloaded under the outage of the Lugo-Pisgah No. 1 230 kV transmission line.

  Mitigation:

- The recommended mitigation strategy is to install a new SPS to trip the project under either one of the outages described above.

Additionally, the Calico Solar Project has aggravated two pre-project transformer overloads under the N-1 contingency analysis.

Overload:

- Lugo No. 1 AA 500/230 kV transformer bank pre-project overload has been aggravated by the project under the outage of the Lugo No. 2AA 500/220 kV transformer bank.
- Lugo No. 2 AA 500/220 kV transformer bank pre-project overload has been aggravated by the project under the outage of the Lugo No. 1AA 500/220 kV transformer bank.

  Mitigation:

- The recommended mitigation strategy is to install a new SPS to trip the project under either one of the N-1 outages described above.

Short Circuit Study Results:

The study identified two 500 kV, five 230 kV, and one 115 kV substation locations where the Calico Solar Project causes the Three Phase and /or the Single Phase to Ground Short Circuit Duties to increase by 0.1 kA or more. The Circuit Breaker evaluation concluded that the project does not trigger any CB replacements or upgrades but aggravated pre-project conditions that require the replacement of twelve 230 kV CB's at Mira Loma Substation. (Table 2.1 and 2.2, Page 11, LGIP Optional Interconnection Study).

D.5.3.4 COMPLIANCE WITH LORS

The findings of the studies conducted for the proposed Calico Solar Project and summarized above indicate that Phases 1 and 2 of the project would comply with the NERC/WECC planning standards and California ISO reliability criteria. The project will be designed and constructed to include the 230 kV substation on the project site and a new 2 mile long, 230 kV single circuit transmission facility from the project site to the

Pisgah Substation. Staff concludes that, assuming the proposed conditions of certification are met, the project would meet the requirements and standards of all applicable LORS for TSE.

D.5.4 REDUCED ACREAGE ALTERNATIVE

The Reduced Acreage alternative would essentially be a 275 MW solar facility located within the central portion of the proposed 850 MW project. It was developed because it can be constructed without upgrading the SCE Lugo-Pisgah transmission line. This alternative's boundaries and the revised locations of the transmission line, substation, laydown, and control facilities are shown in **Alternatives Figure 1**.

D.5.4.1 SETTING AND EXISTING CONDITIONS

Like the proposed project, this alternative would include numerous groups of 60 SunCatchers, connected by underground electrical cables. When aggregated at the project substation, the power generated would interconnect to SCE's existing Pisgah 230 kV substation which is located in San Bernardino County approximately 35 miles east of Barstow, California. There would be fewer SunCatcher groups in this alternative, but the system of aggregation and method of power transmission would be the same as for the proposed project.

D.5.4.2 ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

This alternative would require fewer SunCatcher groups to generate 275 MW. Therefore, it would require fewer distribution facilities and a smaller substation to be built within the project site.

D.5.4.3 CEQA LEVEL OF SIGNIFICANCE

This alternative would require fewer distribution and transmission facilities to be built in the project site. Therefore, installation of fewer transformers, fewer collector distribution feeders and other electrical components would contribute lesser environmental impacts and trigger lesser CEQA analysis.

D.5.5 AVOIDANCE OF DONATED AND ACQUIRED LANDS ALTERNATIVE

Due to the reduction in project size and impacts associated with the northern portion of the originally proposed project layout, the Avoidance of Donated and Acquired Lands Alternative shown in **Alternatives Figure 2** will be addressed in the **Alternatives** section of this SSA.

D.5.6 NO PROJECT / NO ACTION ALTERNATIVE

There are three No Project / No Action Alternatives evaluated as follows:

No Project / No Action Alternative #1: No Action on the Calico Solar Project application and on CDCA land use plan amendment

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM and BLM would not amend the CDCA Plan. As a result, no solar energy project would be constructed on the project site and BLM would continue to manage the site consistent with the existing land use designation in the CDCA Land Use Plan of 1980, as amended.

The results of the No Project / No Action Alternative would be the following:

- The impacts of the proposed project would not occur. However, the land on which the project is proposed would become available to other uses that are consistent with BLM's land use plan, including another renewable energy project.
- The benefits of the proposed project in displacing fossil fuel fired generation and reducing associated greenhouse gas emissions from gas-fired generation would not occur. Both State and Federal law support the increased use of renewable power generation.

If the proposed project is not approved, renewable projects would likely be developed on other sites in San Bernardino County, the Mojave Desert, or in adjacent states as developers strive to provide renewable power that complies with utility requirements and State/Federal mandates. For example, there are dozens of other wind and solar projects that have applications pending with BLM in the California Desert District.

No Project / No Action Alternative #2: No Action on the Calico Solar Project and amend the CDCA land use plan to make the area available for future solar development

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM and BLM would amend the CDCA Land Use Plan of 1980, as amended, to allow for other solar projects on the site. As a result, it is possible that another solar energy project could be constructed on the project site.

Because the CDCA Plan would be amended, it is possible that the site would be developed with the same or a different solar technology. As a result, GHG emissions would result from the construction and operation of the solar technology and would likely be similar to the GHG emissions from the proposed project. Different solar technologies require different amounts of construction and operations maintenance; however, it is expected that all the technologies would provide the more significant benefit, like the proposed project, of displacing fossil fuel fired generation and reducing associated GHG emissions. As such, this No Project/No Action Alternative could result in GHG benefits similar to those of the proposed project.

No Project / No Action Alternative #3: No Action on the Calico Solar Project application and amend the CDCA land use plan to make the area unavailable for future solar development

Under this alternative, the proposed Calico Solar Project would not be approved by the Energy Commission and BLM and the BLM would amend the CDCA Plan to make the proposed site unavailable for future solar development. As a result, no solar energy

project would be constructed on the project site and BLM would continue to manage the site consistent with the existing land use designation in the CDCA Land Use Plan of 1980, as amended.

Because the CDCA Plan would be amended to make the area unavailable for future solar development, it is expected that the site would continue to remain in its existing condition, with no new structures or facilities constructed or operated on the site. As a result, the greenhouse gas emissions from the site, including carbon uptake, is not expected to change noticeably from existing conditions and, as such, this No Project/ No Action Alternative would not result in the GHG benefits from the proposed project. However, in the absence of this project, other renewable energy projects may be constructed to meet State and Federal mandates, and those projects would have similar impacts in other locations.

D.5.7 PROJECT-RELATED FUTURE ACTIONS

Proposed upgrades to the Southern California Edison (SCE) transmission system, known as the 275 MW Early Interconnection option and the 850 MW Full Build-Out option are considered to be reasonably foreseeable actions that would be contingent on construction of the proposed Calico Solar Project. The SCE upgrades are required for the reliable interconnection and transmission of power generated by the proposed Calico Solar Project. The SCE project will be fully evaluated in a future EIR/EIS prepared by the BLM and the California Public Utilities Commission.

The project components and construction activities associated with these future actions are described in detail in Section B.3 of this Staff Assessment/EIS.

- The **275 MW Early Interconnection Option** would include upgrades to the existing SCE system that would result in 275 MW of additional latent system capacity. Under the 275 MW Early Interconnection option, Pisgah Substation would be expanded adjacent to the existing substation, one to two new 220 kV structures would be constructed to support the transmissions interconnection (gen-tie) from the Calico Solar Project into Pisgah Substation, and new telecommunication facilities would be installed within existing SCE Right of Ways (ROWs).
- The **850 MW Full Build-Out Option** would include replacement of a 67-mile 220 kV SCE transmission line with a new 500 kV line, expansion of the Pisgah Substation at a new location and other telecommunication upgrades to allow for additional transmission system capacity to support the operation of the full Calico Solar Project.

D.5.7.1 MITIGATION

The proposed upgrades to the SCE system required for the reliable interconnection of the Early Interconnection Option and the Full Build-Out Option are the mitigation for impacts of the proposed project on the SCE transmission system.

D.5.7.2 CONCLUSION

The transmission upgrades identified in this TSE analysis are required for the reliable interconnection of the Calico Solar project. Without these transmission facilities the SCE

transmission system would not comply with reliability LORS with the Calico Solar Project operating.

D.5.8 CUMULATIVE IMPACT ANALYSIS

Staff has reviewed the lists of existing and foreseeable projects as presented in the **CUMULATIVE SCENARIO** section of this document. Staff's review considers whether the interconnection of the Calico Solar Project to SCE's transmission system along with other existing and foreseeable generation projects would conform to all LORS required for safe and reliable electric power transmission. The analysis described above under the heading Proposed Project – Scope of System Impact Studies is conducted in coordination with, and the approval of, California ISO to consider existing and proposed generator interconnections to the transmission grid and their potential safety and reliability impacts under a number of conservative contingency conditions.

The impacts to the safe and reliable operation of the transmission system due to the Calico Solar Project, as identified in the SIS, would be mitigated with the Energy Commission's and BLM's incorporation of the mitigation measures and COCs set forth in this section to minimize the project's contribution to the cumulative impacts. Staff also believes that there would be some positive impacts because the Calico Solar Project would supplement local solar generation and import of power to the SCE system, meet the increasing load demand in the San Bernardino County, Riverside County.

Geographic Extent

The geographic scope for considering cumulative impacts on the electric system from this project is the Southern California Edison (SCE) grid.

Existing Cumulative Conditions

The SCE grid includes many natural gas-fired power plants, several hydroelectric power plants, and a growing number of solar and wind power plants are being proposed. The existing transmission system in the project area lacks additional capacity and would require upgrades for any projects not currently interconnected to the grid.

Future Foreseeable Projects

Future projects on the SCE grid will likely include numerous solar and wind power plants, as well as more natural gas-fired peaking plants. The ratio of gas-fired to renewable energy power plants is likely to drop as SCE acquires more solar and wind power energy in response to government mandates to increase the portion of energy produced from renewable sources.

Foreseeable Projects in the Barstow Area

The BLM field office in Barstow has received several applications for solar and wind energy projects. Although some of the smaller projects may be closer to the Barstow load center and would not require upgrades to the same transmission lines as the proposed project, the requirements of other larger proposed projects could lead to cumulative impacts to transmission system engineering. However, due to the lack of additional capacity on the SCE transmission system in the project area, any one of

these projects could require upgrades to the SCE system with or without the proposed project.

Foreseeable Renewable Projects in the California and Arizona Desert

Numerous solar, wind power and geothermal projects are foreseeable in the deserts of California and Arizona. The BLM Desert District has received many applications for solar and wind energy projects. Although some of the smaller projects may be closer to the load centers and would not require upgrades to the same SCE transmission lines as the proposed project, the requirements of other larger proposed projects could lead to cumulative impacts to transmission system engineering. However, due to the lack of additional capacity on some of the transmission lines in the area, any one of these projects could require upgrades to the system with or without the proposed project.

D.5.9 COMPLIANCE WITH LORS

The findings of the studies conducted for the proposed Calico Solar Project and summarized in D.5.4.3 above indicate that Phases 1 and 2 of the project would comply with the NERC/WECC planning standards and California ISO reliability criteria. The project will be designed and constructed to include the 230 kV substation on the project site and a new 2 mile long, 230 kV single circuit transmission facility from the project site to the Pisgah Substation. Staff concludes that, assuming the proposed conditions of certification are met, the project would meet the requirements and standards of all applicable LORS for TSE.

D.5.10 NOTEWORTHY PUBLIC BENEFITS

Staff has not identified and noteworthy public benefits to TSE from the proposed Calico Solar Project.

D.5.11 FACILITY CLOSURE

In the future, upon closure of Calico Solar Project, the reduction of electrical generation from the Calico Solar Project would not have an adverse impact on the capacity of the electrical transmission grid, and could potentially open up capacity for newer and more efficient renewable energy projects. The upgrades necessary to the SCE system to transmit the power from the Calico Solar Project to the load centers will remain after the decommissioning of the proposed project.

D.5.12 RESPONSE TO PUBLIC AND AGENCY COMMENTS

Staff has not received comments from the public (including Intervenors) or agencies on the SA/DEIS transmission system engineering section. Specific Final Environmental Impact Statement (FEIS)–related comments will be responded to by the BLM in the FEIS for this project.

D.5.13 PROPOSED CONDITIONS OF CERTIFICATION

The following conditions of certification/mitigation measures are incorporated in the proposed Calico Solar Project to address potential project impacts related to the transmission system.

TSE-1 The project owner shall furnish to the Compliance Project Manager (CPM) and to the Chief Building Official (CBO) a schedule of transmission facility design submittals, a Master Drawing List, a Master Specifications List, and a Major Equipment and Structure List. The schedule shall contain a description and list of proposed submittal packages for design, calculations, and specifications for major structures and equipment. To facilitate audits by Energy Commission staff, the project owner shall provide designated packages to the CPM when requested

Verification: At least 60 days prior to the start of construction (or a lesser number of days mutually agreed to by the project owner and the CBO), the project owner shall submit the schedule, a Master Drawing List, and a Master Specifications List to the CBO and to the CPM. The schedule shall contain a description and list of proposed submittal packages for design, calculations, and specifications for major structures and equipment (see a list of major equipment in **Transmission System Engineering Table 1**, Major Equipment List below). Additions and deletions shall be made to the table only with CPM and CBO approval. The project owner shall provide schedule updates in the Monthly Compliance Report.

Transmission System Engineering Table 1
Major Equipment List

Breakers	Take Off Facilities
Step-Up Transformer	Electrical Control Building
Switchyard	Switchyard Control Building
Busses	Transmission Pole/Tower
Surge Arrestors	Grounding System
Disconnects	

TSE-2 Prior to the start of construction, the project owner shall assign an electrical engineer and at least one of each of the following to the project: A) a civil engineer; B) a geotechnical engineer or a civil engineer experienced and knowledgeable in the practice of soils engineering; C) a design engineer who is either a structural engineer or a civil engineer fully competent and proficient in the design of power plant structures and equipment supports; or D) a mechanical engineer. (Business and Professions Code Sections 6704 et seq. require state registration to practice as a civil engineer or structural engineer in California).

The tasks performed by the civil, mechanical, electrical, or design engineers may be divided between two or more engineers, as long as each engineer is responsible for a particular segment of the project (e.g., proposed earthwork, civil structures, power plant structures, equipment support). No segment of the project shall have more than one responsible engineer. The transmission line may be the responsibility of a separate California-registered electrical

engineer. The civil, geotechnical or civil, and design engineer assigned in conformance with Facility Design condition GEN-5, may be responsible for design and review of the TSE facilities.

The project owner shall submit to the CBO for review and approval, the names, qualifications, and registration numbers of all engineers assigned to the project. If any one of the designated engineers is subsequently reassigned or replaced, the project owner shall submit the name, qualifications, and registration number of the newly assigned engineer to the CBO for review and approval.

The project owner shall notify the CPM of the CBO's approval of the new engineer. This engineer shall be authorized to halt earthwork and to require changes if site conditions are unsafe or do not conform to predicted conditions used as a basis for design of earthwork or foundations.

The electrical engineer shall:

1. Be responsible for the electrical design of the power plant switchyard, outlet and termination facilities; and
2. Sign and stamp electrical design drawings, plans, specifications, and calculations.

Verification: At least 30 days prior to the start of rough grading (or a lesser number of days mutually agreed to by the project owner and the CBO), the project owner shall submit to the CBO for review and approval, the names, qualifications, and registration numbers of all the responsible engineers assigned to the project. The project owner shall notify the CPM of the CBO's approvals of the engineers within 5 days of the approval.

If the designated responsible engineer is subsequently reassigned or replaced, the project owner shall have 5 days in which to submit the name, qualifications, and registration number of the newly assigned engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer within 5 days of that approval.

TSE-3 If any discrepancy in design and/or construction is discovered in any engineering work that has previously undergone CBO design review and approval, the project owner shall document the discrepancy and recommend corrective action (California Building Code, 1998, Chapter 1, Section 108.4, Approval Required; Chapter 17, Section 1701.3, Duties and Responsibilities of the Special Inspector; Appendix Chapter 33, Section 3317.7, Notification of Noncompliance). The discrepancy documentation shall become a controlled document and shall be submitted to the CBO for review and approval and shall reference this condition of certification.

Verification: The project owner shall submit a copy of the CBO's approval or disapproval of any corrective action taken to resolve a discrepancy to the CPM within 15 days of receipt. If disapproved, the project owner shall advise the CPM, within 5 days, the reason for disapproval, and the revised corrective action required obtaining the CBO's approval**.**

TSE-4 For the power plant switchyard, outlet line, and termination, the project owner shall not begin any increment of construction until plans for that increment have been approved by the CBO. These plans, together with design changes and design change notices, shall remain on the site for one year after completion of construction. The project owner shall request that the CBO inspect the installation to ensure compliance with the requirements of applicable LORS. The following activities shall be reported in the Monthly Compliance Report:

1. Receipt or delay of major electrical equipment;
2. Testing or energization of major electrical equipment; and
3. The number of electrical drawings approved, submitted for approval, and still to be submitted**.**

Verification: At least 30 days prior to the start of each increment of construction (or a lesser number of days mutually agreed to by the project owner and the CBO), the project owner shall submit to the CBO for review and approval the final design plans, specifications, and calculations for equipment and systems of the power plant switchyard, outlet line, and termination, including a copy of the signed and stamped statement from the responsible electrical engineer attesting to compliance with the applicable LORS, and shall include a copy of the transmittal letter in the next Monthly Compliance Report**.**

TSE-5 The project owner shall ensure that the design, construction, and operation of the proposed transmission facilities conform to all applicable LORS, including the requirements listed below. The project owner shall submit the required number of copies of the design drawings and calculations as determined by the CBO.

1. The Calico Solar Project shall be interconnected to the SCE grid via a segment of 230 kV, 1590 kcmil-ACSR, approximately 2 mile long single circuit extending from the new substation on the project site to the Pisgah SCE Substation.
2. The Calico Solar Project substation on the project site shall use 34.5 kV, 1200A, 25 breakers and six, three phase, 100/133/167.7 MVA, 34.5 kV/230 kV transformers.
3. The power plant outlet line shall meet or exceed the electrical, mechanical, civil, and structural requirements of CPUC General Order 95 and General Order 98 or National Electric Safety Code (NESC), Title 8 of the California Code and Regulations (Title 8), Articles 35, 36, and 37 of the “High Voltage Electric Safety Orders”, California ISO standards, National Electric Code (NEC), and related industry standards.
4. Breakers and busses in the power plant switchyard and other switchyards, where applicable, shall be sized to comply with a short-circuit analysis.
5. Outlet line crossings and line parallels with transmission and distribution facilities shall be coordinated with the transmission line owner and comply with that owner’s standards.

6. The project conductors shall be sized to accommodate the full output from the project.
7. Termination facilities shall comply with applicable SCE interconnection standards.
8. The project owner shall provide to the CPM:
    a. The final Detailed Facility Study (DFS) including a description of facility upgrades, operational mitigation measures, and/or Special Protection System (SPS) sequencing and timing if applicable,
    b. Executed project owner and California ISO Large Generator Interconnection Agreement.

Verification: At least 60 days prior to the start of construction of transmission facilities (or a lesser number of days mutually agreed to by the project owner and CBO), the project owner shall submit to the CBO for approval:

1. Design drawings, specifications, and calculations conforming with CPUC General Order 95 and General Order 98 or NESC; Title 8, California Code of Regulations, Articles 35, 36, and 37 of the "High Voltage Electric Safety Orders"; NEC; applicable interconnection standards, and related industry standards for the poles/towers, foundations, anchor bolts, conductors, grounding systems, and major switchyard equipment.
2. For each element of the transmission facilities identified above, the submittal package to the CBO shall contain the design criteria, a discussion of the calculation method(s), a sample calculation based on worst-case conditions,[1] and a statement signed and sealed by the registered engineer in responsible charge**,** or other acceptable alternative verification, that the transmission element(s) will conform with CPUC General Order 95 or NESC; Title 8, California Code of Regulations, Articles 35, 36 and 37 of the "High Voltage Electric Safety Orders"; NEC; applicable interconnection standards, and related industry standards.
3. Electrical one-line diagrams signed and sealed by the registered professional electrical engineer in responsible charge, a route map, and an engineering description of equipment and the configurations covered by requirements **TSE-1 through 5** above.
4. The final Detailed Facility Study and the Large Generator Interconnection Agreement, including a description of facility upgrades, operational mitigation measures, and/or SPS sequencing and timing if applicable, shall be provided concurrently to the CPM.

TSE-6 The project owner shall provide the following Notice to the California Independent System Operator (California ISO) prior to synchronizing the facility with the California transmission system:

1. At least one week prior to synchronizing the facility with the grid for testing, provide the California ISO a letter stating the proposed date of synchronization; and

[1] Worst-case conditions for the foundations would include for instance, a dead-end or angle pole.

2. At least one business day prior to synchronizing the facility with the grid for testing, provide telephone notification to the California ISO Outage Coordination Department.

Verification: The project owner shall provide copies of the California ISO letter to the CPM when it is sent to the California ISO one week prior to initial synchronization with the grid. A report of the conversation with the California ISO shall be provided electronically to the CPM one day before synchronizing the facility with the California transmission system for the first time.

TSE-7 The project owner shall be responsible for the inspection of the transmission facilities during and after project construction, and any subsequent CPM and CBO approved changes thereto, to ensure conformance with CPUC GO-95 or NESC; Title 8, CCR, Articles 35, 36 and 37 of the "High Voltage Electric Safety Orders"; applicable interconnection standards; NEC; and related industry standards. In case of non-conformance, the project owner shall inform the CPM and CBO in writing, within 10 days of discovering such non-conformance and describe the corrective actions to be taken.

Verification: Within 60 days after first synchronization of the project, the project owner shall transmit to the CPM and CBO:

1. As-built engineering description(s) and one-line drawings of the electrical portion of the facilities signed and sealed by the registered electrical engineer in responsible charge. A statement attesting to conformance with CPUC GO-95 or NESC; Title 8, California Code of Regulations, Articles 35, 36 and 37 of the "High Voltage Electric Safety Orders"; applicable interconnection standards; NEC; and related industry standards, and these conditions shall be provided concurrently with the submittal of the as-built plans.
2. An as-built engineering description of the mechanical, structural, and civil portions of the transmission facilities signed and sealed by the registered engineer in responsible charge or acceptable alternative verification. As-built drawings of the electrical, mechanical, structural, and civil portions of the transmission facilities shall be maintained at the power plant and made available, if requested, for CPM audit as set forth in the "Compliance Monitoring Plan."
3. A summary of inspections of the completed transmission facilities, and identification of any nonconforming work and corrective actions taken, signed and sealed by the registered engineer in charge.

D.5.13 CONCLUSIONS

The outlet lines and termination of Phases 1 and 2 of the proposed Calico Solar Project are acceptable and would comply with all applicable LORS. The analysis of project transmission lines and equipment, both from the power plant up to the point of interconnection with the existing transmission network as well as upgrades beyond that interconnection that are attributable to the project, have been evaluated by staff and are included in the environmental sections of this SSA.

Staff's analysis with respect to Transmission System Engineering concludes that the Calico Solar Project (850MW) needs to meet the following mitigation measures:

- Expand the existing Pisgah 230 kV interconnection facility and install a new 2,240 MVA, 500/230 kV substation with two 1,120 MVA transformer banks. The expansion of the existing Pisgah 230 kV substation requires California CEQA/NEPA analysis.
- Loop the existing Eldorado-Lugo 500 kV transmission line into the expanded Pisgah substation forming the Eldorado-Pisgah and Lugo-Pisgah No. 1 500 kV transmission lines.
- Install a new Lugo-Pisgah No. 2 500 kV transmission line by removing the existing Lugo-Pisgah No. 2 230 kV transmission line, widening the existing Right-of-Way (ROW) where needed and constructing the new 500 kV structures within the vacated ROW. The widening the existing ROW would require CEQA/NEPA analysis.
- Additionally, a Special Protection System (SPS) will be required to trip the Calico Solar Project to mitigate the thermal overloads caused by the N-1 emergency condition.
- The proposed Calico Solar Project should be designed and constructed with adequate reactive power resources to compensate the consumption of Var by the generator step-up transformers, distribution feeders and generator tie-lines.

RECOMMENDATIONS

If the BLM and Energy Commission approve the proposed Calico Solar Project, staff recommends that the applicant be required to satisfy the conditions of certification/ mitigation measures set forth in this section to ensure both system reliability and conformance with LORS.

D.5.14 REFERENCES

California ISO (California Independent System Operator). 1998a. Cal-ISO Tariff Scheduling Protocol. Posted April 1998, Amendments 1,4,5,6, and 7 incorporated.

California ISO (California Independent System Operator). 1998b. Cal-ISO Dispatch Protocol. Posted April 1998.

California ISO (California Independent System Operator). 2002a. Cal-ISO Grid Planning Standards. February 2002.

SES Solar One phase 1 and 2 (SES Solar One). 2006a. Stirling Energy System, Inc, (System Impact Study) submitted to the California Energy Commission.

SES Solar One LGIP Optional Interconnection Study Report (SES Solar One project). 2008b. California ISO, LGIP Study submitted to the California Energy Commission.

SES Solar One phase 1 and 2 (SES Solar 1). 2008c, SES Solar One, LLC, Application for Certification. Submitted to the California Energy Commission.

NERC/WECC (North American Reliability Council/Western Electricity Coordinating Council). 2002. NERC/WECC Planning Standards. August 2002.

DEFINITION OF TERMS

AAC – All aluminum conductor

ACSR – Aluminum conductor steel-reinforced

ACSS – Aluminum conductor steel-supported

Ampacity – Current-carrying capacity, expressed in amperes, of a conductor at specified ambient conditions, at which damage to the conductor is nonexistent or deemed acceptable based on economic, safety, and reliability considerations.

Ampere – The unit of current flowing in a conductor.

Bundled – Two wires, 18 inches apart.

Bus – Conductors that serve as a common connection for two or more circuits.

Conductor – The part of the transmission line (the wire) that carries the current.

Congestion management – A scheduling protocol, which provides that dispatched generation and transmission loading (imports) will not violate criteria.

Emergency overload – See “Single Contingency.” This is also called an N-1.

Kcmil – Thousand circular mil. A unit of the conductor’s cross sectional area When divided by 1,273, the area in square inches is obtained

Kilovolt (kV) – A unit of potential difference, or voltage, between two conductors of a circuit, or between a conductor and the ground.

Megavars – Mega-volt-Ampere-Reactive. One million Volt-Ampere-Reactive. Reactive power is generally associated with the reactive nature of motor loads that must be fed by generation units in the system.

Megavolt ampere (MVA) – A unit of apparent power. It equals the product of the line voltage in kilovolts, current in amperes, and the square root of 3, divided by 1,000.

Megawatt (MW) – A unit of power equivalent to 1,341 horsepower.

Normal operation/normal overload – The condition arrived at when all customers receive the power they are entitled to, without interruption and at steady voltage, and with no element of the transmission system loaded beyond its continuous rating.

Outlet – Transmission facilities (circuit, transformer, circuit breaker, etc.) linking generation facilities to the main grid.

Power flow analysis – A forward-looking computer simulation of essentially all generation and transmission system facilities that identifies overloaded circuits, transformers, and other equipment and system voltage levels.

Reactive power – Generally associated with the reactive nature of motor loads that must be fed by generation units in the system. An adequate supply of reactive power is required to maintain voltage levels in the system.

Remedial action scheme (RAS) – An automatic control provision, which, for instance, will trip a selected generating unit upon a circuit overload.

Single contingency – Also known as “emergency” or “N-1 condition,” the occurrence when one major transmission element (circuit, transformer, circuit breaker, etc.) or one generator is out of service.

Solid dielectric cable – Copper or aluminum conductors that are insulated by solid polyethylene type insulation and covered by a metallic shield and outer polyethylene jacket.

Switchyard – An integral part of a power plant and used as an outlet for one or more electric generators.

TSE – Transmission system engineering.

Undercrossing – A transmission configuration where a transmission line crosses below the conductors of another transmission line, generally at 90 degrees.

Underbuild – A transmission or distribution configuration where a transmission or distribution circuit is attached to a transmission tower or pole below (under) the principle transmission line conductors.

E. GENERAL CONDITIONS

E - GENERAL CONDITIONS
INCLUDING
COMPLIANCE MONITORING AND CLOSURE PLAN

Prepared by: Mary Dyas

E.1 INTRODUCTION

The project's General Compliance Conditions of Certification, including Compliance Monitoring and Closure Plan (Compliance Plan) have been established as required by Public Resources Code section 25532. The plan provides a means for assuring that the facility is constructed, operated, and closed in compliance with public health and safety, environmental, and other applicable regulations, guidelines, and conditions adopted or established by the California Energy Commission and specified in the written decision on the Application for Certification or otherwise required by law. The Public Resources Code section 25806(d), states that renewable energy projects are exempt from paying an annual compliance fee.

The Compliance Plan is composed of elements that:

- set forth the duties and responsibilities of the Compliance Project Manager (CPM), the project owner, delegate agencies, and others;
- set forth the requirements for handling confidential records and maintaining the compliance record;
- state procedures for settling disputes and making post-certification changes;
- state the requirements for periodic compliance reports and other administrative procedures that are necessary to verify the compliance status for all Energy Commission approved conditions of certification;
- establish requirements for facility closure plans; and
- specify conditions of certification for each technical area containing the measures required to mitigate any and all potential adverse project impacts associated with construction, operation and closure below a level of significance. Each specific condition of certification also includes a verification provision that describes the method of assuring that the condition has been satisfied.

In addition to meeting the Energy Commission's Conditions of Certification, the project owner will be required to comply with all terms and conditions required by the Bureau of Land Management (BLM), as will be described in the BLM's Record of Decision and Right-of-Way Grant documents for this project.

E.2 DEFINITIONS

The following terms and definitions are used to establish when Conditions of Certification are implemented.

PRE-CONSTRUCTION SITE MOBILIZATION

Site mobilization is limited preconstruction activities at the site to allow for the installation of fencing, construction trailers, construction trailer utilities, and construction trailer parking at the site. Limited ground disturbance, grading, and trenching associated with the above mentioned pre-construction activities is considered part of site mobilization. Walking, driving or parking a passenger vehicle, pickup truck and/or light vehicles is allowable during site mobilization.

CONSTRUCTION

Onsite work to install permanent equipment or structures for any facility.

Ground Disturbance

Construction-related ground disturbance refers to activities that result in the removal of top soil or vegetation at the site beyond site mobilization needs, and for access roads and linear facilities.

Grading, Boring, and Trenching

Construction-related grading, boring, and trenching refers to activities that result in subsurface soil work at the site and for access roads and linear facilities, e.g., alteration of the topographical features such as leveling, removal of hills or high spots, moving of soil from one area to another, and removal of soil.

Notwithstanding the definitions of ground disturbance, grading, boring, and trenching above, construction does **not** include the following:

1. the installation of environmental monitoring equipment;
2. a soil or geological investigation;
3. a topographical survey;
4. any other study or investigation to determine the environmental acceptability or feasibility of the use of the site for any particular facility; and
5. any work to provide access to the site for any of the purposes specified in “Construction” 1, 2, 3, or 4 above.

START OF COMMERCIAL OPERATION

For compliance monitoring purposes, “commercial operation” begins after the completion of start-up and commissioning, when the power plant has reached reliable steady-state production of electricity at the rated capacity. At the start of commercial operation, plant control is usually transferred from the construction manager to the plant operations manager.

E.3 COMPLIANCE PROJECT MANAGER RESPONSIBILITIES

The Compliance Project Manager (CPM) shall oversee the compliance monitoring and is responsible for:

1. ensuring that the design, construction, operation, and closure of the project facilities are in compliance with the terms and conditions of the Energy Commission Decision;
2. resolving complaints;
3. processing post-certification changes to the conditions of certification, project description (petition to amend), and ownership or operational control (petition for change of ownership) (See instructions for filing petitions);
4. documenting and tracking compliance filings; and
5. ensuring that compliance files are maintained and accessible.

The CPM is the contact person for the Energy Commission and will consult with appropriate responsible agencies, Energy Commission, and staff when handling disputes, complaints, and amendments.

All project compliance submittals are submitted to the CPM for processing. Where a submittal required by a condition of certification requires CPM approval, the approval will involve all appropriate Energy Commission staff and management. All submittals must include searchable electronic versions (pdf or MS Word files).

E.4 CHIEF BUILDING OFFICIAL RESPONSIBILITIES

The Chief Building Official (CBO) shall serve as the Energy Commission's delegate to assure the project is designed and constructed in accordance with the Energy Commission's Decision including Conditions of Certification, California Building Standards Code, local building codes and applicable laws, ordinances, regulations and standards to ensure health and safety. The CBO is typically made-up of a team of specialists covering civil, structural, mechanical and electrical disciplines whose duties include the following:

1. Performing design review and plan checks of all drawings, specifications and procedures;
2. Conducting construction inspection;
3. Functioning as the Energy Commission's delegate including reporting noncompliance issues or violations to the CPM for action and taking any action allowed under the California Code of Regulations, including issuing a Stop Work Order, to ensure compliance;
4. Exercising access as needed to all project owner construction records, construction and inspection procedures, test equipment and test results; and
5. Providing weekly reports on the status of construction to the CPM.

PRE-CONSTRUCTION AND PRE-OPERATION COMPLIANCE MEETING

The CPM usually schedules pre-construction and pre-operation compliance meetings prior to the projected start-dates of construction, plant operation, or both. The purpose of these meetings is to assemble both the Energy Commission’s and project owner’s technical staff to review the status of all pre-construction or pre-operation requirements contained in the Energy Commission’s conditions of certification. This is to confirm that

all applicable conditions of certification have been met, or if they have not been met, to ensure that the proper action is taken. In addition, these meetings ensure, to the extent possible, that Energy Commission conditions will not delay the construction and operation of the plant due to oversight and to preclude any last minute, unforeseen issues from arising. Pre-construction meetings held during the certification process must be publicly noticed unless they are confined to administrative issues and processes.

ENERGY COMMISSION RECORD

The Energy Commission shall maintain the following documents and information as a public record, in either the Energy Commission's Compliance file or Dockets file, for the life of the project (or other period as required):

- All documents demonstrating compliance with any legal requirements relating to the construction and operation of the facility;
- All monthly and annual compliance reports filed by the project owner;
- All complaints of noncompliance filed with the Energy Commission; and
- All petitions/requests for project or condition of certification changes and the resulting Energy Commission action.

E.5 PROJECT OWNER RESPONSIBILITIES

The project owner is responsible for ensuring that the compliance conditions of certification and all other conditions of certification that appear in the Commission Decision are satisfied. The compliance conditions regarding post-certification changes specify measures that the project owner must take when requesting changes in the project design, conditions of certification, or ownership. Failure to comply with any of the conditions of certification or the compliance conditions may result in reopening of the case and revocation of Energy Commission certification; an administrative fine; or other action as appropriate. A summary of the Compliance Conditions of Certification is included as **Compliance Table 1** at the conclusion of this section.

E.6 COMPLIANCE MITIGATION MEASURES/CONDITIONS OF CERTIFICATION

UNRESTRICTED ACCESS (COMPLIANCE-1)

The CPM, responsible Energy Commission staff, and delegated agencies or consultants shall be guaranteed and granted unrestricted access to the power plant site, related facilities, project-related staff, and the records maintained on-site for the purpose of conducting audits, surveys, inspections, or general site visits. Although the CPM will normally schedule site visits on dates and times agreeable to the project owner, the CPM reserves the right to make unannounced visits at any time.

COMPLIANCE RECORD (COMPLIANCE-2)

The project owner shall maintain project files on-site or at an alternative site approved by the CPM for the life of the project, unless a lesser period of time is specified by the

conditions of certification. The files shall contain copies of all “as-built” drawings, documents submitted as verification for conditions, and other project-related documents.

Energy Commission staff and delegate agencies shall, upon request to the project owner, be given unrestricted access to the files maintained pursuant to this condition.

COMPLIANCE VERIFICATION SUBMITTALS (COMPLIANCE-3)

Each condition of certification is followed by a means of verification. The verification describes the Energy Commission’s procedure(s) to ensure post-certification compliance with adopted conditions. The verification procedures, unlike the conditions, may be modified as necessary by the CPM.

Verification of compliance with the conditions of certification can be accomplished by the following:

1. monthly and/or annual compliance reports, filed by the project owner or authorized agent, reporting on work done and providing pertinent documentation, as required by the specific conditions of certification;
2. appropriate letters from delegate agencies verifying compliance;
3. energy Commission staff audits of project records; and/or
4. energy Commission staff inspections of work, or other evidence that the requirements are satisfied.

Verification lead times associated with start of construction may require the project owner to file submittals during the certification process, particularly if construction is planned to commence shortly after certification.

A cover letter from the project owner or authorized agent is required for all compliance submittals and correspondence pertaining to compliance matters. **The cover letter subject line shall identify the project by AFC number, the appropriate condition(s) of certification by condition number(s), and a brief description of the subject of the submittal**. The project owner shall also identify those submittals **not** required by a condition of certification with a statement such as: “This submittal is for information only and is not required by a specific condition of certification.” When submitting supplementary or corrected information, the project owner shall reference the date of the previous submittal and CEC submittal number.

The project owner is responsible for the delivery and content of all verification submittals to the CPM, whether such condition was satisfied by work performed by the project owner or an agent of the project owner. All hardcopy submittals shall be addressed as follows:

Mary Dyas
Compliance Project Manager
08-AFC-13C
California Energy Commission
1516 Ninth Street (MS-2000)
Sacramento, CA 95814

Those submittals shall be accompanied by a searchable electronic copy, on a CD or by e-mail, as agreed upon by the CPM.

If the project owner desires Energy Commission staff action by a specific date, that request shall be made in the submittal cover letter and shall include a detailed explanation of the effects on the project if that date is not met.

PRE-CONSTRUCTION MATRIX AND TASKS PRIOR TO START OF CONSTRUCTION (COMPLIANCE-4)

Prior to commencing construction, a compliance matrix addressing only those conditions that must be fulfilled before the start of construction shall be submitted by the project owner to the CPM. This matrix will be included with the project owner's first compliance submittal or prior to the first pre-construction meeting, whichever comes first. It will be submitted in the same format as the compliance matrix described below.

Construction shall not commence until the pre-construction matrix is submitted, all pre-construction conditions have been complied with, and the CPM has issued a letter to the project owner authorizing construction. Various lead times for submittal of compliance verification documents to the CPM for conditions of certification are established to allow sufficient staff time to review and comment and, if necessary, allow the project owner to revise the submittal in a timely manner. This will ensure that project construction may proceed according to schedule.

Failure to submit compliance documents within the specified lead-time may result in delays in authorization to commence various stages of project development.

If the project owner anticipates commencing project construction as soon as the project is certified, it may be necessary for the project owner to file compliance submittals prior to project certification. Compliance submittals should be completed in advance where the necessary lead time for a required compliance event extends beyond the date anticipated for start of construction. The project owner must understand that the submittal of compliance documents prior to project certification is at the owner's own risk. Any approval by Energy Commission staff is subject to change, based upon the Commission Decision.

Compliance Reporting

There are two different compliance reports that the project owner must submit to assist the CPM in tracking activities and monitoring compliance with the terms and conditions of the Energy Commission Decision. During construction, the project owner or authorized agent will submit Monthly Compliance Reports. During operation, an Annual Compliance Report must be submitted. These reports, and the requirement for an accompanying compliance matrix, are described below. The majority of the conditions of certification require that compliance submittals be submitted to the CPM in the monthly or annual compliance reports.

COMPLIANCE MATRIX (COMPLIANCE-5)

A compliance matrix shall be submitted by the project owner to the CPM along with each monthly and annual compliance report. The compliance matrix is intended to provide the CPM with the current status of all conditions of certification in a spreadsheet format. The compliance matrix must identify:

1. the technical area;
2. the condition number;
3. a brief description of the verification action or submittal required by the condition;
4. the date the submittal is required (e.g., 60 days prior to construction, after final inspection, etc.);
5. the expected or actual submittal date;
6. the date a submittal or action was approved by the Chief Building Official (CBO), CPM, or delegate agency, if applicable;
7. the compliance status of each condition, e.g., “not started,” “in progress” or “completed” (include the date); and
8. if the condition was amended, the date of the amendment.

Satisfied conditions shall be placed at the end of the matrix.

MONTHLY COMPLIANCE REPORT (COMPLIANCE-6)

The first Monthly Compliance Report is due one month following the Energy Commission business meeting date upon which the project was approved, unless otherwise agreed to by the CPM. The first Monthly Compliance Report shall include the AFC number and an initial list of dates for each of the events identified on the **Key Events List. The Key Events List form is found at the end of these General Conditions.**

During pre-construction and construction of the project, the project owner or authorized agent shall submit an original and an electronic searchable version of the Monthly Compliance Report within 10 working days after the end of each reporting month. Monthly Compliance Reports shall be clearly identified for the month being reported. The reports shall contain, at a minimum:

1. a summary of the current project construction status, a revised/updated schedule if there are significant delays, and an explanation of any significant changes to the schedule;
2. documents required by specific conditions to be submitted along with the Monthly Compliance Report. Each of these items must be identified in the transmittal letter, as well as the conditions they satisfy and submitted as attachments to the Monthly Compliance Report;
3. an initial, and thereafter updated, compliance matrix showing the status of all conditions of certification;
4. a list of conditions that have been satisfied during the reporting period, and a description or reference to the actions that satisfied the condition;

5. a list of any submittal deadlines that were missed, accompanied by an explanation and an estimate of when the information will be provided;
6. a cumulative listing of any approved changes to conditions of certification;
7. a listing of any filings submitted to, or permits issued by, other governmental agencies during the month;
8. a projection of project compliance activities scheduled during the next two months. The project owner shall notify the CPM as soon as any changes are made to the project construction schedule that would affect compliance with conditions of certification;
9. a listing of the month's additions to the on-site compliance file; and
10. a listing of complaints, notices of violation, official warnings, and citations received during the month, a description of the resolution of the resolved actions, and the status of any unresolved actions.

All sections, exhibits, or addendums shall be separated by tabbed dividers or as acceptable by the CPM.

ANNUAL COMPLIANCE REPORT (COMPLIANCE-7)

After construction is complete, the project owner shall submit Annual Compliance Reports instead of Monthly Compliance Reports. The reports are for each year of commercial operation and are due to the CPM each year at a date agreed to by the CPM. Annual Compliance Reports shall be submitted over the life of the project, unless otherwise specified by the CPM. Each Annual Compliance Report shall include the AFC number, identify the reporting period, and shall contain the following:

1. an updated compliance matrix showing the status of all conditions of certification (fully satisfied conditions do not need to be included in the matrix after they have been reported as completed);
2. a summary of the current project operating status and an explanation of any significant changes to facility operations during the year;
3. documents required by specific conditions to be submitted along with the Annual Compliance Report. Each of these items must be identified in the transmittal letter with the condition it satisfies, and submitted as attachments to the Annual Compliance Report;
4. a cumulative listing of all post-certification changes approved by the Energy Commission or cleared by the CPM;
5. an explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided;
6. a listing of filings submitted to, or permits issued by, other governmental agencies during the year;
7. a projection of project compliance activities scheduled during the next year;
8. a listing of the year's additions to the on-site compliance file;

9. an evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date (see Compliance Conditions for Facility Closure addressed later in this section); and
10. a listing of complaints, notices of violation, official warnings, and citations received during the year, a description of the resolution of any resolved matters, and the status of any unresolved matters.

CONFIDENTIAL INFORMATION (COMPLIANCE-8)

Any information that the project owner deems confidential shall be submitted to the Energy Commission's Executive Director with an application for confidentiality pursuant to Title 20, California Code of Regulations, section 2505(a). Any information that is determined to be confidential shall be kept confidential as provided for in Title 20, California Code of Regulations, section 2501, et. seq.

REPORTING OF COMPLAINTS, NOTICES, AND CITATIONS (COMPLIANCE-9)

Prior to the start of construction, the project owner must send a letter to property owners living within one mile of the project notifying them of a telephone number to contact project representatives with questions, complaints, or concerns. If the telephone is not staffed 24 hours per day, it shall include automatic answering with a date and time stamp recording. All recorded complaints shall be responded to within 24 hours. The telephone number shall be posted at the project site and made easily visible to passersby during construction and operation. The telephone number shall be provided to the CPM who will post it on the Energy Commission's web page at http://www.energy.ca.gov/sitingcases/power_plants_contacts.html.

Any changes to the telephone number shall be submitted immediately to the CPM, who will update the web page.

In addition to the monthly and annual compliance reporting requirements described above, the project owner shall report and provide copies to the CPM of all complaint forms, including noise and lighting complaints, notices of violation, notices of fines, official warnings, and citations within 10 days of receipt. Complaints shall be logged and numbered. Noise complaints shall be recorded on the form provided in the **NOISE** conditions of certification. All other complaints shall be recorded on the complaint form (Attachment A).

E.7 FACILITY CLOSURE

At some point in the future, the project will cease operation and close down. At that time, it will be necessary to ensure that the closure occurs in such a way that public health and safety and the environment are protected from adverse impacts. Although the project setting for this project does not appear, at this time, to present any special or unusual closure problems, it is impossible to foresee what the situation will be in 30 years or more when the project ceases operation. Therefore, provisions must be made that provide the flexibility to deal with the specific situation and project setting that exist at the time of closure. Laws, Ordinances, Regulations, and Standards (LORS)

pertaining to facility closure are identified in the sections dealing with each technical area. Facility closure will be consistent with LORS in effect at the time of closure.

There are at least three circumstances in which a facility closure can take place: planned closure, unplanned temporary closure, and unplanned permanent closure**.**

CLOSURE DEFINITIONS

Planned Closure

A planned closure occurs when the facility is closed in an anticipated, orderly manner, at the end of its useful economic or mechanical life, or due to gradual obsolescence.

Unplanned Temporary Closure

An unplanned temporary closure occurs when the facility is closed suddenly and/or unexpectedly, on a short-term basis, due to unforeseen circumstances such as a natural disaster or an emergency.

Unplanned Permanent Closure

An unplanned permanent closure occurs if the project owner closes the facility suddenly and/or unexpectedly, on a permanent basis. This includes unplanned closure where the owner implements the on-site contingency plan. It can also include unplanned closure where the project owner fails to implement the contingency plan, and the project is essentially abandoned.

CLOSURE DEFINITIONS

Planned Closure

A planned closure occurs when the facility is closed in an anticipated, orderly manner, at the end of its useful economic or mechanical life, or due to gradual obsolescence.

Unplanned Temporary Closure

An unplanned temporary closure occurs when the facility is closed suddenly and/or unexpectedly, on a short-term basis, due to unforeseen circumstances such as a natural disaster or an emergency. Short-term is defined as cessation of construction activities or operations of a power plant for a period less than 6-months long. Cessation of construction of operations for a period longer than 6 months in considered a permanent closure.

Unplanned Permanent Closure

An unplanned permanent closure occurs if the project owner closes the facility suddenly and/or unexpectedly, on a permanent basis. This includes unplanned closure where the owner implements the on-site contingency plan. It can also include unplanned closure where the project owner fails to implement the contingency plan, and the project is essentially abandoned.

E.8 COMPLIANCE CONDITIONS FOR FACILITY CLOSURE

PLANNED CLOSURE (COMPLIANCE-10)

In order to ensure that a planned facility closure does not create adverse impacts, a closure process that provides for careful consideration of available options and applicable laws, ordinances, regulations, standards, and local/regional plans in existence at the time of closure will be undertaken. To ensure adequate review of a planned project closure, the project owner shall submit a proposed facility closure plan to the Energy Commission for review and approval at least 12 months (or other period of time agreed to by the CPM) prior to the commencement of closure activities. The project owner shall file 120 copies (or other number of copies agreed upon by the CPM) of a proposed facility closure plan with the Energy Commission.

The plan shall:

1. identify and discuss any impacts and mitigation to address significant adverse impacts associated with proposed closure activities and to address facilities, equipment, or other project related remnants that will remain at the site;
2. identify a schedule of activities for closure of the power plant site, transmission line corridor, and all other appurtenant facilities constructed as part of the project;
3. identify any facilities or equipment intended to remain on site after closure, the reason, and any future use; and
4. address conformance of the plan with all applicable laws, ordinances, regulations, standards, and local/regional plans in existence at the time of facility closure, and applicable conditions of certification.

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

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

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

UNPLANNED TEMPORARY CLOSURE/ON-SITE CONTINGENCY PLAN (COMPLIANCE-11)

In order to ensure that public health and safety and the environment are protected in the event of an unplanned temporary facility closure, it is essential to have an on-site contingency plan in place. The on-site contingency plan will help to ensure that all necessary steps to mitigate public health and safety impacts and environmental impacts are taken in a timely manner.

The project owner shall submit an on-site contingency plan for CPM review and approval. The plan shall be submitted no less than 60 days (or other time agreed to by the CPM) prior to commencement of commercial operation. The approved plan must be in place prior to commercial operation of the facility and shall be kept at the site at all times.

The project owner, in consultation with the CPM, will update the on-site contingency plan as necessary. The CPM may require revisions to the on-site contingency plan over the life of the project. In the annual compliance reports submitted to the Energy Commission, the project owner will review the on-site contingency plan, and recommend changes to bring the plan up to date. Any changes to the plan must be approved by the CPM.

The on-site contingency plan shall provide for taking immediate steps to secure the facility from trespassing or encroachment. In addition, for closures of more than 90 days, unless other arrangements are agreed to by the CPM, the plan shall provide for removal of hazardous materials and hazardous wastes, draining of all chemicals from storage tanks and other equipment, and the safe shutdown of all equipment. (Also see specific conditions of certification for the technical areas of **Hazardous Materials Management** and **Waste Management**)

In addition, consistent with requirements under unplanned permanent closure addressed below, the nature and extent of insurance coverage, and major equipment warranties must also be included in the on-site contingency plan. In addition, the status of the insurance coverage and major equipment warranties must be updated in the annual compliance reports.

In the event of an unplanned temporary closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the circumstances and expected duration of the closure.

If the CPM determines that an unplanned temporary closure is likely to be permanent, or for a duration of more than 12 months, a closure plan consistent with the requirements for a planned closure shall be developed and submitted to the CPM within 90 days of the CPM's determination (or other period of time agreed to by the CPM).

UNPLANNED PERMANENT CLOSURE/ON-SITE CONTINGENCY PLAN (COMPLIANCE-12)

The on-site contingency plan required for unplanned temporary closure shall also cover unplanned permanent facility closure. All of the requirements specified for unplanned temporary closure shall also apply to unplanned permanent closure.

In addition, the on-site contingency plan shall address how the project owner will ensure that all required closure steps will be successfully undertaken in the event of abandonment.

In the event of an unplanned permanent closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail within 24 hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the status of all closure activities.

A closure plan, consistent with the requirements for a planned closure, shall be developed and submitted to the CPM within 90 days of the permanent closure or another period of time agreed to by the CPM.

POST CERTIFICATION CHANGES TO BLM'S ROW GRANT AND/OR THE ENERGY COMMISSION DECISION: AMENDMENTS, OWNERSHIP CHANGES, STAFF APPROVED PROJECT MODIFICATIONS AND VERIFICATION CHANGES (COMPLIANCE-13)

The project owner must petition the Energy Commission pursuant to Title 20, California Code of Regulations, section 1769, in order to modify the project (including linear facilities) design, operation or performance requirements, and to transfer ownership or operational control of the facility. **It is the responsibility of the project owner to contact the CPM to determine if a proposed project change should be considered a project modification pursuant to section 1769.** Implementation of a project modification without first securing Energy Commission, or Energy Commission staff approval, may result in enforcement action that could result in civil penalties in accordance with section 25534 of the Public Resources Code.

A petition is required for **amendments** and for **staff approved project modifications** as specified below. Both shall be filed as a "Petition to Amend." Staff will determine if the change is significant or insignificant. For verification changes, a letter from the project owner is sufficient. In all cases, the petition or letter requesting a change should be submitted to the CPM, who will file it with the Energy Commission's Dockets Unit in accordance with Title 20, California Code of Regulations, section 1209.

The criteria that determine which type of approval and the process that applies are explained below. They reflect the provisions of Section 1769 at the time this condition was drafted. If the Commission's rules regarding amendments are amended, the rules in effect at the time an amendment is requested shall apply.

AMENDMENT

The project owner shall petition the Energy Commission, pursuant to Title 20, California Code of Regulations, Section 1769(a), when proposing modifications to the project (including linear facilities) design, operation, or performance requirements. If a proposed modification results in deletion or change of a condition of certification, or makes changes that would cause the project not to comply with any applicable laws, ordinances, regulations, or standards the petition will be processed as a formal amendment to the final decision, which requires public notice and review of the Energy Commission staff analysis and approval by the full Commission. The petition shall be in the form of a legal brief and fulfill the requirements of Section 1769(a). Upon request, the CPM will provide a sample petition to use as a template.

CHANGE OF OWNERSHIP

Change of ownership or operational control also requires that the project owner file a petition pursuant to section 1769 (b). This process requires public notice and approval by the full Commission. The petition shall be in the form of a legal brief and fulfill the requirements of Section 1769(b). Upon request, the CPM will provide a sample petition to use as a template.

STAFF APPROVED PROJECT MODIFICATION

Modifications that do not result in deletions or changes to conditions of certification, that are compliant with laws, ordinances, regulations and standards and will not have significant environmental impacts may be authorized by the CPM as a staff approved project modification pursuant to section 1769(a) (2). Once staff files an intention to approve the proposed project modifications, any person may file an objection to staff's determination within 14 days of service on the grounds that the modification does not meet the criteria of section 1769 (a)(2). If a person objects to staff's determination, the petition must be processed as a formal amendment to the decision and must be approved by the full commission at a noticed business meeting or hearing.

VERIFICATION CHANGE

A verification may be modified by the CPM without requesting an amendment to the decision if the change does not conflict with the conditions of certification and provides an effective alternate means of verification.

E.9 CBO DELEGATION AND AGENCY COOPERATION

In performing construction and operation monitoring of the project, Energy Commission staff acts as, and has the authority of, the Chief Building Official (CBO). Energy Commission staff may delegate CBO responsibility to either an independent third party contractor or the local building official. Energy Commission staff retains CBO authority when selecting a delegate CBO, including enforcing and interpreting state and local codes, and use of discretion, as necessary, in implementing the various codes and standards.

Energy Commission staff may also seek the cooperation of state, regional, and local agencies that have an interest in environmental protection when conducting project monitoring.

E.10 ENFORCEMENT

The Energy Commission's legal authority to enforce the terms and conditions of its Decision is specified in Public Resources Code sections 25534 and 25900. The Energy Commission may amend or revoke the certification for any facility, and may impose a civil penalty for any significant failure to comply with the terms or conditions of the Energy Commission Decision. The specific action and amount of any fines the Energy Commission may impose would take into account the specific circumstances of the incident(s). This would include such factors as the previous compliance history, whether

the cause of the incident involves willful disregard of LORS, oversight, unforeseeable events, and other factors the Energy Commission may consider.

ENERGY COMMISSION NONCOMPLIANCE COMPLAINT PROCEDURES

Any person or agency may file a complaint alleging noncompliance with the conditions of certification. Such a complaint will be subject to review by the Energy Commission pursuant to Title 20, California Code of Regulations, section 1237, but in many instances the noncompliance can be resolved by using the informal dispute resolution process. Both the informal and formal complaint procedure, as described in current State law and regulations, are described below. They shall be followed unless superseded by future law or regulations.

Informal Dispute Resolution Process

The following procedure is designed to informally resolve disputes concerning the interpretation of compliance with the requirements of this compliance plan. The project owner, the Energy Commission, or any other party, including members of the public, may initiate an informal dispute resolution process. Disputes may pertain to actions or decisions made by any party, including the Energy Commission's delegate agents.

This process may precede the more formal complaint and investigation procedure specified in Title 20, California Code of Regulations, section 1237, but is not intended to be a substitute for, or prerequisite to it. This informal procedure may not be used to change the terms and conditions of certification as approved by the Energy Commission, although the agreed upon resolution may result in a project owner, or in some cases the Energy Commission staff, proposing an amendment.

The process encourages all parties involved in a dispute to discuss the matter and to reach an agreement resolving the dispute. If a dispute cannot be resolved, then the matter must be brought before the full Energy Commission for consideration via the complaint and investigation procedure.

Request for Informal Investigation

Any individual, group, or agency may request the Energy Commission to conduct an informal investigation of alleged noncompliance with the Energy Commission's terms and conditions of certification. All requests for informal investigations shall be made to the designated CPM.

Upon receipt of a request for an informal investigation, the CPM shall promptly notify the project owner of the allegation by telephone and letter. All known and relevant information of the alleged noncompliance shall be provided to the project owner and to the Energy Commission staff. The CPM will evaluate the request and the information to determine if further investigation is necessary. If the CPM finds that further investigation is necessary, the project owner will be asked to promptly investigate the matter. Within seven working days of the CPM's request, provide a written report to the CPM of the results of the investigation, including corrective measures proposed or undertaken. Depending on the urgency of the noncompliance matter, the CPM may conduct a site

visit and/or request the project owner to also provide an initial verbal report, within 48 hours.

Request for Informal Meeting

In the event that either the party requesting an investigation or the Energy Commission staff is not satisfied with the project owner's report, investigation of the event, or corrective measures proposed or undertaken, either party may submit a written request to the CPM for a meeting with the project owner. Such request shall be made within 14 days of the project owner's filing of its written report. Upon receipt of such a request, the CPM shall:

1. immediately schedule a meeting with the requesting party and the project owner, to be held at a mutually convenient time and place;
2. secure the attendance of appropriate Energy Commission staff and staff of any other agencies with expertise in the subject area of concern, as necessary;
3. conduct such meeting in an informal and objective manner so as to encourage the voluntary settlement of the dispute in a fair and equitable manner;
4. After the conclusion of such a meeting, promptly prepare and distribute copies to all in attendance and to the project file, a summary memorandum that fairly and accurately identifies the positions of all parties and any understandings reached. If an agreement has not been reached, the CPM shall inform the complainant of the formal complaint process and requirements provided under Title 20, California Code of Regulations, section 1230, et. seq.

Formal Dispute Resolution Procedure-Complaints and Investigations

Any person may file a complaint with the Energy Commission's Dockets Unit alleging noncompliance with a Commission decision adopted pursuant to Public Resources Code section 25500. Requirements for complaint filings and a description of how complaints are processed are in Title 20, California Code of Regulations, section 1237.

KEY EVENTS LIST

PROJECT:

DOCKET #:

COMPLIANCE PROJECT MANAGER:

BLM AUTHORIZED OFFICER:

EVENT DESCRIPTION	DATE
Certification Date	
Obtain Site Control	
Online Date	
POWER PLANT SITE ACTIVITIES	_____
Start Site Mobilization	
Start Ground Disturbance	
Start Grading	
Start Construction	
Begin Pouring Major Foundation Concrete	
Begin Installation of Major Equipment	
Completion of Installation of Major Equipment	
First Combustion of Gas Turbine	
Obtain Building Occupation Permit	
Start Commercial Operation	
Complete All Construction	
TRANSMISSION LINE ACTIVITIES	_____
Start T/L Construction	
Synchronization with Grid and Interconnection	
Complete T/L Construction	
FUEL SUPPLY LINE ACTIVITIES	_____
Start Gas Pipeline Construction and Interconnection	
Complete Gas Pipeline Construction	
WATER SUPPLY LINE ACTIVITIES	_____
Start Water Supply Line Construction	
Complete Water Supply Line Construction	

COMPLIANCE TABLE 1
SUMMARY of COMPLIANCE CONDITIONS OF CERTIFICATION

CONDITION NUMBER	SUBJECT	DESCRIPTION
COMPLIANCE-1	**Unrestricted Access**	The project owner shall grant Energy Commission staff and delegate agencies or consultants unrestricted access to the power plant site.
COMPLIANCE-2	**Compliance Record**	The project owner shall maintain project files on-site. Energy Commission staff and delegate agencies shall be given unrestricted access to the files.
COMPLIANCE-3	**Compliance Verification Submittals**	The project owner is responsible for the delivery and content of all verification submittals to the CPM, whether such condition was satisfied by work performed or the project owner or his agent.
COMPLIANCE-4	**Pre-construction Matrix and Tasks Prior to Start of Construction**	• Construction shall not commence until the all of the following activities/submittals have been completed: property owners living within one mile of the project have been notified of a telephone number to contact for questions, complaints or concerns, a pre-construction matrix has been submitted identifying only those conditions that must be fulfilled before the start of construction, all pre-construction conditions have been complied with, the CPM has issued a letter to the project owner authorizing construction.
COMPLIANCE-5	**Compliance Matrix**	A compliance matrix shall be submitted by the project owner to the CPM along with each monthly and annual compliance report.
COMPLIANCE-6	**Monthly Compliance Report including a Key Events List**	During construction, the project owner shall submit Monthly Compliance Reports (MCRs) which include specific information. The first MCR is due the month following the Energy Commission business meeting date on which the project was approved and shall include an initial list of dates for each of the events identified on the Key Events List.
COMPLIANCE-7	**Annual Compliance Reports**	After construction ends and throughout the life of the project, the project owner shall submit Annual Compliance Reports instead of Monthly Compliance Reports.

COMPLIANCE TABLE 1
SUMMARY of COMPLIANCE CONDITIONS OF CERTIFICATION

CONDITION NUMBER	SUBJECT	DESCRIPTION
COMPLIANCE-8	**Confidential Information**	Any information the project owner deems confidential shall be submitted to the Energy Commission's Executive Director with a request for confidentiality.
COMPLIANCE-9	**Reporting of Complaints, Notices, and Citations**	Prior to the start of construction, the project owner must send a letter to property owners living within one mile of the project notifying them of a telephone number to contact project representatives with questions, complaints, or concerns.
COMPLIANCE-10	**Planned Facility Closure**	The project owner shall submit a closure plan to the CPM at least 12 months prior to commencement of a planned closure.
COMPLIANCE-11	**Unplanned Temporary Facility Closure**	To ensure that public health and safety and the environment are protected in the event of an unplanned temporary closure, the project owner shall submit an on-site contingency plan no less than 60 days prior to commencement of commercial operation.
COMPLIANCE-12	**Unplanned Permanent Facility Closure**	To ensure that public health and safety and the environment are protected in the event of an unplanned permanent closure, the project owner shall submit an on-site contingency plan no less than 60 days prior to commencement of commercial operation.
COMPLIANCE-13	**Post-certification changes to the Decision**	The project owner must petition the Energy Commission to delete or change a condition of certification, modify the project design or operational requirements and/or transfer ownership of operational control of the facility.

ATTACHMENT 1
COMPLAINT REPORT / RESOLUTION FORM

Complaint Log Number:_____ Docket Number:_____

Project Name:_____

COMPLAINTANT INFORMATION

Name:_____ Phone Number:_____

Address:_____

COMPLAINT

DATE COMPLAINT RECEIVED:_____ TIME COMPLAINT RECEIVED:_____

COMPLAINT RECEIVED BY: ☐ TELEPHONE ☐ IN WRITING (COPY ATTACHED)

DATE OF FIRST OCCURRENCE:_____

DESCRIPTION OF COMPLAINT (INCLUDING DATES, FREQUENCY, AND DURATION):_____

_____

_____

FINDINGS OF INVESTIGATION BY PLANT PERSONNEL:_____

_____

_____

ATTACHMENT 1
COMPLAINT REPORT / RESOLUTION FORM

DOES COMPLAINT RELATE TO VIOLATION OF A CEC REQUIREMENT? ☐ YES ☐ NO

DATE COMPLAINTANT CONTACTED TO DISCUSS FINDINGS:_____

DESCRIPTION OF CORECTIVE MEASURES TAKEN OR OTHER COMPLAINT RESOLUTION:_____

_____

_____

DOES COMPLAINTANT AGREE WITH PROPOSED RESOLUTION? ☐ YES ☐ NO

IF NOT, EXPLAIN:_____

_____

CORRECTIVE ACTION

IF CORRECTIVE ACTION NECESSARY, DATE COMPLETED:_____

DATE FIRST LETTER SENT TO COMPLAINTANT (COPY ATTACHED):_____

DATE FINAL LETTER SENT TO COMPLAINTANT (COPY ATTACHED):_____

OTHER RELEVANT INFORMATION:_____

_____

_____

ATTACHMENT 1
COMPLAINT REPORT / RESOLUTION FORM

"This information is certified to be correct."

PLANT MANAGER SIGNATURE:_____ DATE:_____

(ATTACH ADDITIONAL PAGES AND ALL SUPPORTING DOCUMENTATION, AS REQUIRED)

F. LIST OF PREPARERS

CALICO SOLAR PROJECT
08-AFC-13
LIST OF PREPARERS

Executive Summary ..... Christopher Meyer

Introduction ..... Christopher Meyer

Proposed Project ..... Christopher Meyer

Alternatives ..... Susan Lee and Emily Capello

Cumulative Scenario ..... Susan Lee and Emily Capello

Air Quality ..... William Walters

Biological Resources ..... Chris Huntley, Scott White and Carolyn Chainey-Davis

Geology & Paleontology ..... Dal Hunter

Hazardous Materials Management ..... Rick Tyler and Alvin Greenberg

Public Health and Safety ..... Alvin Greenberg

Hydrology, Water Use, and Water Quality .... Eugene Yates, John Fio and Casey Weaver

Land Use, Recreation, and Wilderness ..... Negar Vahidi and Susanne Huerta

Noise and Vibration ..... Erin Bright

Socioeconomics and Environmental Justice ..... Kristin Ford

Transmission Line Safety and Nuisance ..... Obed Odoemelam

Visual Resources ..... William Kanemoto, Alan Lindsley and James Jewell

Waste Management ..... Ellie Townsend-Hough

Worker Safety and Fire Protection ..... Rick Tyler and Alvin Greenberg

Facility Design ..... Shahab Khoshmashrab

Geologic Stability ..... Dal Hunter

Power Plant Efficiency ..... Shahab Khoshmashrab

Power Plant Reliability ..... Shahab Khoshmashrab

Transmission System Engineering ..... Sudath A. Edirisuriya and Mark Hesters

General Conditions ..... Mary Dyas

Project Assistant ..... Sabrina Savala

G. WITNESS QUALIFICATIONS AND DECLARATIONS

DECLARATION OF
Christopher Meyer

I**, Christopher Meyer,** declare as follows:

1. I am presently employed by Aspen Environmental Group, a contractor to the California Energy Commission, Siting, Transmission and Environmental Protection Division, as a **Project Manager**.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I prepared the staff testimony on **Executive Summary, Introduction, and Proposed Project** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 7/19/10 Signed: Original signed by C. Meyer

At: Sacramento, California

CHRISTOPHER MEYER

Senior Associate,
Energy and Infrastructure/Cultural Resources

ACADEMIC BACKGROUND

B.A., Biological Anthropology/Archaeology
California State University, Hayward, 1993

PROFESSIONAL EXPERIENCE

Mr. Meyer's has over eleven years with Aspen in support of CEQA/NEPA projects including EIR/EIS, IS/MND, and EA. His background combines strong experience in environmental inspection, compliance management, and project management on large-scale construction projects with a solid background in archaeological field investigations. With over 15 years experience as an archaeologist, Mr. Meyer is familiar with the cultural settings of California and Oregon and the regulatory requirements for cultural resource management under CEQA/NEPA. He has worked closely with construction contractors, agency representatives, and Native American tribal governments to ensure projects are built on time, within budget, and in compliance with all environmental requirements. In addition to field experience, he has worked as a project manager, produced reports, document, and permit applications, and has reviewed mitigation measures for federal, State, and local government agencies as well as corporations.

Aspen Environmental Group — 1997 to present

California Energy Commission (CEC), Technical Assistance in Application for Certification Review, Siting Project Manager. In response to California's power shortage, Aspen is assisting the CEC in evaluating the environmental and engineering aspects of new power plant applications throughout the State. As part of this effort, Mr. Meyer serves as a Project Manager and supervises technical staff members, preparing the CEC's CEQA-equivalent Preliminary Staff Assessments and Final Staff Assessments in response to applications for the construction of new power plants across the State. Responsibilities include: review of applications for new power plants; identifying potential issues with proposed power plants; preparation of conditions of certification for proposed power plants; review and editing of CEC technical staff's analysis, scheduling and coordinating public workshops; tracking status of permitting process; coordinating with affected agencies to resolve potential concerns; detailed reporting; conflict resolution; and preparing briefings for the CEC Siting Committee.

California Energy Commission (CEC), Technical Assistance in Application for Certification Review, Compliance Project Manager. In response to California's power shortage, Aspen is assisting the CEC in evaluating the environmental and engineering aspects of new power plant applications throughout the State. As part of this effort, Mr. Meyer served as a Compliance Project Manager and supervised technical staff members, preparing the CEC's Conditions of Certification for construction of power plants across the State as well as managing on-going operational issues with power plants currently under license with the CEC. Responsibilities included: preparation of amendments to conditions of certification for existing power plants; review of applications for new power plants; drafting of Memoranda of Understanding with Chief Building Officials; coordinating with affected agencies to resolve concerns with potential impacts to cultural resources or threatened or endangered species; maintaining contractor construction milestones, detailed reporting; development of mitigation measures; conflict resolution; and inspection for compliance with the Conditions of Certification.

SDG&E Miguel-Mission 230 kV #2 Project Construction Monitoring and Supplemental Environmental Review Program, Lead Environmental Monitor. Under contract to the California Public Utilities Commission (CPUC), Mr. Meyer served as Lead Environmental Monitor and supervised one environmental monitor in the field, monitoring the implementation of the CPUC environmental impact report's conditions of approval for construction of the overhead 230 kV electric transmission line and substations upgrades. The project included installing a new 230 kV circuit on existing towers along the 35-mile right-of-way, as well as relocating 69 kV and 138 kV circuits on approximately 80 steel pole structures. In addition, the Miguel Substation and Mission Substation was modified to accommodate the new 230 kV transmission circuit. Responsibilities included: supervision, guidance and development of environmental monitors in field monitoring as well as the compliance review of pre-construction plans and mitigation compliance documentation, review of variance requests and temporary extra work space (TEWS) requests; recommendations for CPUC issuance of Notices to Proceed with construction and variance approvals; approval of TEWS requests; and coordination with SDG&E, construction managers and subcontractors, and landowners, local municipalities, affected and interested agencies and the public.

SCE Viejo Systems Project Construction Monitoring and Supplemental Environmental Review Program, Lead Environmental Monitor. Under contract to the California Public Utilities Commission (CPUC), Mr. Meyer served as Lead Environmental Monitor and supervises one environmental monitor in the field, monitoring the implementation of the CPUC negative declaration's conditions of approval for construction of the overhead 66 kV and 220 kV electric transmission lines and substation upgrades and construction. This Southern California Edison (SCE) project involves the installation of a 220/66/12 kV substation and 3.1-mile 66 kV transmission line in southern Orange County, California. The transmission line will traverse residential and recreational areas in the City of Mission Viejo and the substation is located in a business park adjacent to a wilderness area in the City of Lake Forest. Responsibilities include: supervision, guidance and development of environmental monitors in field monitoring as well as the compliance review of pre-construction plans and mitigation compliance documentation, review of variance requests and temporary extra work space (TEWS) requests; recommendations for CPUC issuance of Notices to Proceed with construction and variance approvals; approval of TEWS requests; and coordination with SDG&E, construction managers and subcontractors, and landowners, local municipalities, affected and interested agencies and the public.

PG&E Tri-Valley 2002 Capacity Increase Project Construction Monitoring and Supplemental Environmental Review Program, Lead Environmental Monitor. Under contract to the California Public Utilities Commission (CPUC), Mr. Meyer serves as Lead Environmental Monitor and supervises two environmental monitors in the field, monitoring the implementation of the CPUC environmental impact report's conditions of approval for construction of this combination overhead and underground 230 kV electric transmission lines and substations. Construction involves underground installation of the double-circuit 230 kV transmission line conduit and construction of a substation and several transition stations as three separate phases. Responsibilities include: supervision, guidance and development of environmental monitors in field monitoring as well as the compliance review of pre-construction plans and mitigation compliance documentation, variance requests and temporary extra work space (TEWS) requests; recommendations for CPUC issuance of Notices to Proceed with construction and variance approvals; approval of TEWS requests; and coordination with PG&E, construction managers and subcontractors, and landowners, local municipalities, affected and interested agencies and the public.

PG&E Jefferson-Martin 230 kV Transmission Line Project, Lead Environmental Monitor. Under contract to CPUC, Mr. Meyer served as Lead Environmental Monitor and supervised two environmental monitors in the field, monitoring the implementation of the CPUC compliance, and reporting program for the PG&E Jefferson-Martin Project. This project involved the installation of a 27-mile 230 kV transmission line through scenic San Mateo County in the Highway 280 corridor, urban Colma and Daly City, and across San Bruno Mountain. Responsibilities included: supervision,

guidance and development of environmental monitors in field monitoring as well as the compliance review of pre-construction plans and mitigation compliance documentation, variance requests and temporary extra work space (TEWS) requests; recommendations for CPUC issuance of Notices to Proceed with construction and variance approvals; approval of TEWS requests; and coordination with PG&E, construction managers and subcontractors, and landowners, local municipalities, affected and interested agencies and the public.

California Energy Commission Emergency Siting Team, Power Plant Development, Compliance Project Manager. Under contract to the California Energy Commission (CEC), Mr. Meyer served as a Compliance Project Manager and supervised technical staff members, preparing the CEC's Conditions of Certification for construction of emergency power plants across the State. Responsibilities included: review of applications for new emergency power plants; drafting of Memoranda of Understanding with Chief Building Officials; coordinating with affected agencies to resolve concerns with potential impacts to cultural resources or threatened or endangered species; maintaining contractor construction milestones, detailed reporting; development of mitigation measures; conflict resolution; and inspection for compliance with the Conditions of Certification.

California Energy Commission Coastal Power Plant Study, Archaeologist. This research study undertaken by the California Energy Commission (CEC) examined the engineering and environmental issues associated with 24 coastal power plants. The purpose of the study was to identify, describe, and analyze issues with the potential to substantially delay or complicate the certification process for future applications to the Energy Commission for expansion or modernization of existing coastal power plants. For this study, Mr. Meyer was responsible for performing site surveys and reviewing documentation for cultural resources for all 24 Coastal Power Plants.

CEC Hydroelectric Power Plant Inventory Study, Natural Resources Analyst. Mr. Meyer assisted in the collection of power and environmental data on over 200 hydroelectric power plants located in California. Physical power data included electrical output, system upgrades, water storage capacity and peaking availability. Environmental information included developing a data base addressing sensitive species issues, fish screens and ladders, monitoring parameters and a map of known hydroelectric facilities and barriers to anadromous fish passage.

Devers-Palo Verde 500 kV Transmission Line Project EIS/EIR, southern California/western Arizona. For this EIR/EIS prepared by US Bureau of Land Management and CPUC, Mr. Meyer assisted in the review and development of construction mitigation measures for SCE's proposed 250-mile long transmission line project from the Palo Verde Nuclear power plant in Arizona to the northern Palm Springs area in California. Major issues of concern include EMF and visual impacts on property values, impacts on the area's vast recreational resources and tribal lands, and the development and evaluation of several route alternatives, including the Devers-Valley No. 2 Route Alternative, which eventually was approved by the CPUC.

Antelope-Pardee 500 kV Transmission Line Project EIS/EIR, Los Angeles County, CA. For this EIR/EIS prepared by USFS, Angeles National Forest and CPUC, Mr. Meyer assisted in the review and development of construction mitigation measures for SCE's proposed 25-mile long transmission line project from the Antelope Substation in the City of Lancaster, through the ANF, and terminating at SCE's Pardee Substation in Santa Clarita. Major issues of concern included impacts to biological, recreational, and cultural resources within Forest lands, EMF and visual impacts on property values, impacts on residences in the urbanized southern regions of the route, and the development and evaluation of several route alternatives.

Tehachapi Renewable Transmission Project (TRTP) EIR/EIS, Kern, Los Angeles, and San Bernardino Counties, CA. For this EIR/EIS prepared by USFS, Angeles National Forest and CPUC, Mr. Meyer assisted in the review and development of construction mitigation measures for

SCE's proposal to construct, use, and maintain a series of new and upgraded high-voltage electric transmission lines and substations to deliver electricity generated from new wind energy projects in eastern Kern County. Approximately 46 miles of the project would be located in a 200- to 400-foot right-of-way on National Forest System land (managed by the Angeles National Forest) and approximately three miles would require expanded right-of-way within the Angeles National Forest. The proposed transmission system upgrades of TRTP are separated into eight distinct segments: Segments 4 through 11. Segments 1 (Antelope-Pardee) and Segments 2 and 3 (Antelope Transmission Project) were evaluated in separated CEQA and NEPA documents as described above.

PG&E Northeast San Jose Transmission Reinforcement Project Construction Monitoring and Supplemental Environmental Review Program, Lead Environmental Monitor. Under contract to the California Public Utilities Commission (CPUC), Mr. Meyer served as Lead Environmental Monitor and supervised two environmental monitors in the field, monitoring the implementation of the CPUC environmental impact report's conditions of approval for construction of this combination overhead and underground 230 kV electric transmission lines and substations in the Cities of San Jose, Milpitas, and Fremont. Construction of the dual 230kV circuit involved underground construction, single-pole tower installation, and construction of the Los Esteros Substation. Given the proximity of the project to the Bay, sensitive biological resources were present, including the burrowing owl and wetland mitigation sites. Responsibilities included: supervision, guidance and development of environmental monitors in field monitoring as well as the compliance review of pre-construction plans and mitigation compliance documentation, variance requests and temporary extra work space (TEWS) requests; recommendations for CPUC issuance of Notices to Proceed with construction and variance approvals; approval of TEWS requests; and coordination with PG&E, construction managers and subcontractors, and landowners, local municipalities, affected and interested agencies and the public.

Pacific Pipeline Project EIR/EIS for the U.S. Forest Service, Angeles National Forest, and the California Public Utilities Commission, Environmental Monitor. Served as an Environmental Monitor and supervised mitigation monitoring for all sensitive resources for a construction segment along a 132-mile crude oil pipeline within southern California. Coordinated construction activities with the applicant's inspection team, archaeological specialists and Native American monitors through areas with sensitive cultural, biological, and visual resources. Monitored for hazardous materials management, storm water pollution prevention, and biological and cultural resources. Maintained daily written documentation of compliance activities.

ESSEX ENVIRONMENTAL **1995 TO 1997**

Sierra Pacific Power Co., Alturas 345 kV Electric Transmission Project, Associate. Assisted in the development of the environmental management program implementation plan for a 164-mile electric transmission line. Wrote the Storm Water Pollution Protection Plan (SWPPP) for the California and Nevada segments.

DECLARATION OF
Susan V. Lee

I, Susan V. Lee, declare as follows:

1. I am presently employed by Aspen Environmental Group, consultant to the California Energy Commission's Facilities Siting Office of the Systems Assessments and Facilities Siting Division as a Senior Associate/Vice President.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I prepared the staff testimony on Alternatives for the Calico Solar Project based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 22, 2010 Signed: Susan Lee

At: San Francisco, California

SUSAN V. LEE

Vice President, San Francisco Operations

ACADEMIC BACKGROUND

M.S., Applied Earth Science, Stanford University, 1984
B.A., Geology, Oberlin College, 1977

PROFESSIONAL EXPERIENCE

Ms. Lee has over 25 years of technical and managerial experience in environmental assessment, and she currently manages Aspen's San Francisco Office. Her expertise is in management of environmental assessment for infrastructure and energy projects (renewable energy projects, electric transmission lines, pipelines, and gas-fired power plants) under both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Ms. Lee has managed preparation of several major controversial transmission line and pipeline siting EIR/EISs, including the Sunrise Powerlink, Path 15, Jefferson-Martin, Tri-Valley, and Devers–Palo Verde No. 2. Prior to employment at Aspen, Ms. Lee worked for 10 years with the Federal government [the U.S. Minerals Management Service (MMS) and the U.S. Geological Survey (USGS)].

Ms. Lee has worked for Aspen Environmental Group since 1993. She has contributed to both technical and project management aspects of Aspen's environmental projects, including the following:

- **California Energy Commission**. Ms. Lee has supported CEC staff since the fall of 2000. To date, she has prepared analyses for 14 power plants throughout the State, and she has also contributed to several special project reports. She has participated in numerous public workshops and hearings around the state, and completed the CEC's Expert Witness Training. Her major efforts for the CEC include the following:
  - Ms. Lee is managing the Alternatives and Cumulative impact analyses for several solar thermal projects on public lands, coordinating NEPA issues with BLM staff and CEQA issues with the Energy Commission's Project Manager. Projects include the Ivanpah Solar Electric Generating Station, Stirling (SES) Solar Two, SES Solar One (Calico), Solar Millennium Blythe and Palen projects, and the NextEra Genesis project.
  - Ms. Lee has prepared staff assessment **Alternatives Analyses** (consistent with CEQA and the CEC's procedures) for the CEC's staff reports considering proposed new or re-powered gas-fired power plants at South Bay (San Diego), Blythe (BEP II), Morro Bay, El Segundo, Avenal, San Joaquin Valley, Potrero Unit 7 (San Francisco), Tracy, East Altamont, Henrietta, and the San Francisco Electric Reliability Project. She also prepared the alternatives analysis for the CEC's Blythe Transmission Modifications Project. In addition to preparing staff assessment sections documenting comparative impacts of alternatives, this work includes making presentations at PSA Workshops and testifying at Evidentiary Hearings.
  - Ms. Lee managed preparation of the CEC's first comprehensive dry cooling analysis for a coastal power plant using once-through cooling, the **Morro Bay Power Plant Modernization Project**. She managed a team of authors who developed a preliminary cooling design, and provided impact analysis.
  - Ms. Lee managed a three-year transmission corridor modeling project, **Planning Alternative Corridors for Transmission (PACT)**, in conjunction with the CEC PIER Environmental Program. The model uses Geographic Information Systems and decision modeling to assist in comparing potential alternative transmission corridors. Aspen's work included overall contract management, as well as development and management of a Project Steering Committee and six Technical Advisory Groups.
  - Ms. Lee prepared a detailed Background Report and made a presentation at an Energy Commission workshop on "**Comparative Alternatives to Transmission**" as part of the Integrated Energy Policy Report (IEPR)

2004 Update process. This project evaluated non-wires alternatives to transmission lines; ongoing work is related to development of a methodology for consideration of these alternatives as part of the transmission planning process.

- Ms. Lee served as the CEC's **Project Manager** for the Small Power Plant Exemption (SPPE) environmental review process for the Woodland Generation Station 2, an 80-megawatt power plant proposed by the Modesto Irrigation District.
- Ms. Lee managed preparation of **Power Plant Cooling Options Reports** for the Potrero Unit 7 Project, Morro Bay, SMUD Cosumnes, and El Segundo power plants. These analyses include conceptual design of dry cooling systems, hybrid cooling systems, and water supply options including use of reclaimed water in both once through and hybrid cooling systems.
- Ms. Lee has provided management and technical support to Aspen's preparation of several reports for the CEC: the Environmental Performance Report, the Coastal Power Plant Study, and the Alternative Generation Technology study.

- **California Valley Solar Ranch EIR.** Under contract to San Luis Obispo County, Ms. Lee is managing preparation of an EIR to evaluate development of a 250 MW solar photovoltaic power facility on nearly 4,000 acres in the Carrizo Plain.
- **SDG&E Sunrise Powerlink Transmission Project EIR/EIS**. Under a $14 million contract to the CPUC, and under a Memorandum of Understanding with the Bureau of Land Management (BLM), Ms. Lee managed preparation of an EIR/EIS for a highly controversial 150-mile transmission line from Imperial County to coastal San Diego County.
- **SCE Devers–Palo Verde No. 2 Transmission Line Project EIR/EIS**. Under contract to the CPUC, Ms. Lee managed preparation of an EIR/EIS to evaluate the impacts of a constructing a 230-mile 500 kV transmission line between the Palo Verde generating hub in Arizona and SCE's Devers Substation.
- **Long-Term Procurement Planning and Barriers to Renewable Power Implementation**. For the CPUC, Ms. Lee and a team of environmental and economic specialists developed environmental and economic data and developed timelines of permitting and barriers to implementing the proposed 33 percent Renewable Portfolio Standard, including ranking and screening of available energy resources.
- **Jefferson-Martin 230 kV Transmission Line Project**. Ms. Lee managed preparation of an EIR for PG&E's proposed 27-mile transmission line through scenic San Mateo County in the Highway 280 corridor, urban Colma and Daly City, and across San Bruno Mountain for the California Public Utilities Commission (CPUC).
- **PG&E Northeast San Jose Transmission Reinforcement Project**: Ms. Lee served as the Project Manager for this CPUC contract to evaluate PG&E's proposed transmission improvements in Santa Clara and Alameda Counties.
- **PG&E Tri-Valley 2002 Capacity Increase Project.** Ms. Lee managed preparation of the Draft and Final EIRs for this controversial and complex project during 2000 and 2001, which was certified by the CPUC in May 2001. The Draft EIR (over 800 pages) evaluated proposed transmission lines and substations in the Tri-Valley area (Cities of Pleasanton, Dublin, Livermore, and San Ramon) of Alameda and Contra Costa Counties, and responded to a high level of local concern regarding electric and magnetic fields (EMFs).

DECLARATION OF
Emily Capello

I, Emily Capello, declare as follows:

1. I am presently employed by Aspen Environmental Group, consultant to the California Energy Commission's Facilities Siting Office of the Systems Assessments and Facilities Siting Division as an Environmental Scientist.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I prepared the staff testimony on Alternatives and the Cumulative Scenario for the Calico Solar Project based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 29, 2010 Signed: Emily Capello

At: San Francisco, California

EMILY CAPELLO

Environmental Scientist

ACADEMIC BACKGROUND

M.P.A., Environmental Science and Policy, Columbia University, 2007
B.A., English Literature and History, Tufts University, 2000

PROFESSIONAL EXPERIENCE

Ms. Emily Capello joined Aspen Environmental Group in 2007 as an Environmental Scientist. She has provided technical writing and management support for the following current projects.

- Sunrise Powerlink Project
- Ivanpah Solar Electric Generating System
- Stirling Energy Systems, Solar Two Project
- City of Palmdale Hybrid Power Plant Project
- Sonoma-Marin Area Rail Transit

Ms. Capello has five years of experience in international agriculture development, environmental education, and rural health and development.

Aspen Environmental Group **2007 - present**

Ms. Capello has contributed to both technical and management aspects of Aspen's environmental projects, including the following:

- **SDG&E Sunrise Powerlink Transmission Line Project EIR/EIS, CPUC and BLM, Section Coordinator, (2007-present).** Ms. Capello managed the environmental analysis for one of the project's connected actions and one of the project's indirect effects located in Baja California, handling data collection in an international context. She also contributed to the project's general analysis and assisted in writing responses to the more than 649 comments on the Draft EIR/EIS and Recirculated Draft EIR/Supplemental Draft EIS. Following the publication of the Final EIR/EIS in October 2008, Ms. Capello assisted with decision support, contributed to the CPUC CEQA Findings of Fact for the project. The highly controversial proposed project is a 150 mile 500 kV and 230 kV transmission line from Imperial County near El Centro to the City of San Diego.
- **California Energy Commission, (2008-present).** Ms. Capello researches and contributes to the Cumulative Scenario and cumulative analysis approach as well as the Alternatives section for a number of Staff Assessment/Environmental Impact Statement for renewable projects in the California Desert region. This includes:
  - **Ivanpah Solar Energy Generating System.** 400 MW solar power tower power plant located in the California desert near Primm, Nevada. The lead agency for this power plant under CEQA is the California Energy Commission (CEC), the power plant would be sited on federal land and the lead agency under NEPA is the United States Bureau of Land Management (BLM).

- **Stirling Energy Systems, Solar Two, (2008-present).** Stirling engine solar thermal 750 MW project, near El Centro, California.
- **Calico Solar Project, (2009-present).** Stirling engine solar thermal 850 MW project near Barstow, California.
- **Palen Solar Power Project, (2009-present).** 500 MW solar trough project near Desert Center, California.
- **Blythe Solar Power Project, (2009-present).** 1,000 MW solar trough project near Blythe, California.
- **Genesis Solar Power Project, (2009-present).** 250 MW solar trough project near Blythe, California.

- **City of Palmdale Hybrid Power Plant Project, CEC, Staff, (2008-present).** Researches and contributes to the alternatives analysis in compliance with CEQA for this 617 MW power plant located in Palmdale, California which includes an approximately 35-mile transmission interconnection.
- **Sonoma-Marin Area Rail Transit, SMART, Staff, (2009-present).** Updated and wrote the cumulative scenario for the SMART passenger rail project NEPA environmental review based on a compilation of projects gathered from local planning agency representatives. The SMART project is located along an approximately 70-mile existing rail corridor extending from Cloverdale in Sonoma County, California, to a ferry terminal located in Larkspur, Marin County, California.
- **Northern California CO2 Storage Pilot, Confidential Client, CEQA and NEPA compliance coordinator, (2008-present).** Contributed to the preparation of Department of Energy NEPA environmental questionnaire to comply with Category Exclusion requirements and preparation of the Initial Statement under CEQA for the proposed CO2 sequestration pilot test site in Montezuma Hills, California.
- **Devers-Palo Verde No. 2 Transmission Line Project EIR/EIS Addendum, CPUC and BLM**, **Staff, (2008-2009).** Researcher and writer for the Addendum to the Final EIR for the Devers-Palo Verde No. 2 Transmission Line Project including research regarding the renewable projects located in the region between Blythe and Desert Center, California.
- **Arizona Utilities CO2 Storage Pilot, CEC and University of California, NEPA compliance coordinator, (2007-2008).** Contributed to the preparation of Department of Energy NEPA environmental questionnaire to comply with Category Exclusion requirements for the proposed CO2 sequestration pilot test site near Joseph City, Arizona.

Previous Employment 2000 to 2007

Ms. Capello worked for *Doctors Without Borders USA* as a researcher to calculate its Carbon Footprint and present means of lowering and offsetting its impact. She was a group manager for consulting work for the *Wildlife Conservation Society's* Translink Project, managing the research, design, and production of multi-media projects focused on conservation and economic development. Ms. Capello was also a Peace Corps Trainer at *CHP, International* from September 2004 to December 2005 and from September 2005 to April 2006. She coordinated and facilitated daily training sessions in multiple rural health, sanitation, agriculture, and apiculture themes. She worked as the Education Department Vice-Director for the *Instituto de Permacultura e Ecovila do Cerrado*, in Brazil, co-writing the permaculture course curriculum, and facilitating and coordinating courses in three languages from April to September 2005.

TRAINING AND PROFESSIONAL ORGANIZATIONS

- *Association of Environmental Professionals:* California Environmental Quality Act (CEQA) One-Day Workshop.

DECLARATION OF
Testimony of William Walters, P.E.

I**, William Walters,** declare as follows:

1. I am presently employed by Aspen Environmental Group, a contractor to the California Energy Commission's Siting, Transmission and Environmental Protection Division, as a senior associate in engineering and physical sciences.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on **Air Quality** for the **Calico Solar** project based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 20, 2010 Signed: Original signed by W. Walters

At: Agoura Hills, California

WILLIAM WALTERS, P.E.
Air Quality Specialist

ACADEMIC BACKGROUND
B.S., Chemical Engineering, 1985, Cornell University

PROFESSIONAL EXPERIENCE

Mr. Walters has over 20 years of technical and project management experience in environmental compliance work, including environmental impact reports, emissions inventories, source permitting, energy and pollution control research RCRA/CERCLA site assessment and closure, site inspection, and source monitoring,.

Aspen Environmental Group 2000 to present

Responsible as lead technical and/or project manager of environmental projects. Specific responsibilities and projects include the following:

- **Engineering and Environmental Technical Assistance to Conduct Application for Certification Review for the California Energy Commission:**
  - Preparation and project management of the air quality section of the Staff Assessment and/or Initial Study and the visual plume assessment for the following California Energy Commission (CEC) licensing projects: Hanford Energy Park; United Golden Gate, Phase I; Huntington Beach Modernization Project (including Expert Witness Testimony); Woodland Generating Station 2; Ocotillo Energy Project, Phase I; Magnolia Power Project; Colusa Power Project; Inland Empire Energy Center; Rio Linda/Elverta Power Plant Project; Roseville Energy Center; Henrietta Peaker Project; Tracy Peaking Power Plant Project (including Expert Witness Testimony); Avenal Energy Project; San Joaquin Valley Energy Center (including expert witness testimony); Salton Sea Unit 6 Project (including expert witness testimony); Modesto Irrigation District Electric Generation Station (including expert witness testimony); Walnut Energy Center (including expert witness testimony); Riverside Energy Resource Center (including expert witness testimony); Pastoria Energy Facility Expansion; Panoche Energy Center; Starwood Power Plant; and Riverside Energy Resource Center Units 3 and 4 Project (in progress).
  - Preparation and project management of the visual plume assessment for the following California Energy Commission (Energy Commission) licensing projects: Metcalf Energy Center Power Project (including Expert Witness Testimony); Contra Costa Power Plant Project (including Expert Witness Testimony); Mountainview Power Project; Potrero Power Plant Project; El Segundo Modernization Project; Morro Bay Power Plant Project; Valero Cogeneration Project; East Altamont Energy Center (including expert witness testimony); Russell City Energy Center; SMUD Cosumnes Power Plant Project (including expert witness testimony); Pico Power Project; Blythe Energy Project Phase II; City of Vernon Malburg Generating Station; San Francisco Electric Reliability Project; Los Esteros Critical Energy Facility Phase II; Roseville Energy Park; City of Vernon Power Plant; South Bay Replacement Project; Walnut Creek Energy Park; Sun Valley Energy Project; Highgrove Power Plant; Colusa Generating Station; Russell City Energy Center; Avenal Energy Project; Carlsbad Energy Center; Community Power Project; Panoche Energy Center; San Gabriel Generating Station; Sentinel Energy Project; and Victorville 2 Hybrid Power Project.
  - Assistance in the aircraft safety review of thermal plume turbulence for the Riverside Energy Resources Center; Russell City Energy Center Amendment (including expert witness testimony); Eastshore Energy Power Plant (including expert witness testimony); Carlsbad Energy Center (in progress), Riverside Energy Resource Center Units 3 and 4 Project; Victorville 2 Hybrid Power Project; and the Blythe Energy Power

Plant and Blythe Energy Project Phase II (including expert witness testimony) siting cases. Assistance in the aircraft safety review of thermal and visual plumes of the operating Blythe Energy Power Plant. Preparation of a white paper on methods for the determination of vertical plume velocity determination for aircraft safety analyses.

- Preparation and instruction of a visual water vapor plume modeling methodology class for the CEC.
- Preparation and project management of the public health section of the Initial Study for the Woodland Generating Station 2 Energy Commission licensing project.
- Preparation of project amendment or project compliance assessments, for air quality or visual plume impacts, for several licensed power plants, including: Metcalf Energy Center; Pastoria Power Plant; Elk Hills Power Plant; Henrietta Peaker Project; Tracy Peaker Project; Magnolia Power Project; Delta Energy Center; SMUD Cosumnes Power Plant; Walnut Energy Center; San Joaquin Valley Energy Center; City of Vernon Malburg Generating Station; Otay Mesa Power Plant; Los Esteros Critical Energy Facility; Pico Power Project; Riverside Energy Resource Center; Blythe Energy Project Phase II; Inland Empire Energy Center; Salton Sea Unit 6 Project; and Starwood Power-Midway Peaking Power Plant.
- Preparation of the air quality section of the staff paper "A Preliminary Environmental Profile of California's Imported Electricity" for the Energy Commission and presentation of the findings before the Commission.
- Preparation of the draft staff paper "Natural Gas Quality: Power Turbine Performance During Heat Content Surge", and presentation of the preliminary findings at the California Air Resources Board Compressed Natural Gas Workshop and a SoCalGas Technical Advisory Committee meeting.
- Preparation of the staff paper "Emission Offsets Availability Issues" and preparation and presentation of the Emission Offsets Constraints Workshop Summary paper for the Energy Commission.
- Preparation of information request and data analysis to update the Energy Commission's Cost of Generation Model capital and operating cost factors for combined and simple cycle gas turbine projects. Additionally, performed a review of the presentation for the revised model as part of the CEC's 2007 Integrated Energy Policy Report workshops, and attended the workshop and answering Commissioner questions on the data collection and data analysis.

- For the **Los Angeles Department of Water and Power (LADWP)**:
  - Preparation of the Air Quality Inventory for the LADWP River Supply Pipeline Project EIR.
  - Project management and preparation of the Air Quality Section for the LADWP Valley Generating Station Stack Removal IS/MND support project.
- For the **U.S. Army Corps of Engineers (Corps)**:
  - Preparation of the Air Quality Section and General Conformity Analysis for the Matilija Dam Ecosystem Restoration Project EIS/R for the Corps.
  - Preparation of emission inventory and General Conformity Analysis of the Murrieta Creek Flood Control Project and the Joint Red Flag exercise to be conducted in the Nevada Test and Training Range.
  - Emission inventory for the construction activities forecast for the San Jose/Old San Jose Creeks Ecosystem Restoration project for the Corps.

- Other Projects:
  - Preparation of the Air Quality Section of the LAUSD New School Construction Program EIR and provided traffic trip and VMT calculation support for the Traffic and Transportation Section.

- Preparation of the draft staff paper "Natural Gas Quality: Power Turbine Performance During Heat Content Surge", and presentation of the preliminary findings at the California Air Resources Board Compressed Natural Gas Workshop and a SoCalGas Technical Advisory Committee meeting.
- Preparation of the Air Quality Section of the Environmental Information Document in support of the Coastal Consistency Determinations for the suspension of operation requests for undeveloped units and leases off the Central California Coast.
- Preparation of comments on the Air Quality, Alternatives, Marine Traffic, Public Safety, and Noise section of the Cabrillo Port Liquefied Natural Gas Deepwater Port Draft EIS/EIR for the City of Oxnard.
- Preparation of the emission estimates used in the Air Quality Sections for the DWR Tehachapi Second Afterbay Project Initial Study and EIR.

Camp Dresser & McKee, Inc. 1998 to 2000

Mr. Walters was responsible as lead technical and/or project manager of environmental projects. Specific responsibilities and projects include the following:

- Preparation of emission inventories and dispersion modeling for criteria and air toxic pollutants for the Los Angeles International Airport Master Plan (LAXMP) EIS/EIR.
- Project Manager/Technical lead for the completion of air permit applications and air compliance audits for two Desa International fireplace accessory manufacturing facilities located in Santa Ana, California.
- Project manager/technical lead for the completion of Risk Management Plans (RMPs) for four J.R. Simplot food processing facilities in Oregon, Idaho, and Washington and the Consolidated Reprographics facility located in Irvine, California.

Planning Consultants Research 1997 to 1998

Mr. Walters was responsible as lead technical and/or project manager of environmental projects. Specific responsibilities and projects include the following:

- Project Manager for a stationary source emission audit of the entire Los Angeles International Airport complex for Los Angeles World Airports (LAWA) in support of the LAXMP.
- Review of the Emission Dispersion Modeling System (EDMS) and preparation of a report with findings to the Federal Aviation Administration for LAWA in support of the LAXMP.
- Project manager for the ambient air monitoring and deposition monitoring studies performed for LAWA in support of the LAXMP, including the selection of the monitoring sites and specialty subcontractor, and review of all monitoring data.

Aspen Environmental Group/Clean Air Solutions 1995 to 1996

Mr. Walters was responsible as lead technical and/or project manager of environmental projects. Specific responsibilities and projects include the following:

- Manager of the Portland, Oregon, office of Clean Air Solutions from March 1995 to December 1995, with responsibilities including Project Management, Business Development, and Administration.
- Control technology assessment, engineering support and Notice of Intent to construct preparation for J.R. Simplot's Hermiston, Oregon, food processing facility. Review and revision of an Air Contaminant Discharge Permit application, Title V permit application, and PSD modeling analysis for J.R. Simplot's Hermiston facility.

- Air quality compliance report including an air emission inventory, regulation and permit compliance determination, and recommendations for compliance for Lumber Tech, Inc.'s Lebanon, Oregon, wood products facility.

Fluor Daniel, Inc. 1990 to 1995 and 1996 to 1997

Mr. Walters was responsible as lead technical or project manager for major environmental projects for both government and private clients. His projects included:

- Prepared several air permit applications for the ARCO Los Angeles Refinery Polypropylene Plant Project; Phase I environmental assessments for properties located in Southern California; and a site investigation and RCRA closure plan for a hazardous waste storage site in Vernon, California.
- Project manager of the Anaconda Smelter site for the U.S. Environmental Protection Agency's (EPA) Alternative Remedial Contract System (ARCS) project during the conclusion of technical activities and project closeout. Prepared a cost recovery report for the project.
- Performed environmental analysis for the Bonneville Power Authority, including air pollution BACT analysis, wastewater analysis, and evaluation of secondary environmental effects of electric power producing technologies.

Jacobs Engineering Group 1988 to 1990

Mr. Walters was responsible for a wide range of air pollution regulatory and testing projects, including the following:

- Project manager of air toxic emission inventory reports prepared for U.S. Borax's boron mining and refining facility and the Naval Aviation Depot (N. Island Naval Base, San Diego, California).
- Prepared air permit applications and regulatory correspondence for several facilities including the U.S. Department of Energy's Feed Material Production Center uranium processing facility in Fernald, Ohio; Evaluation of a sludge dewatering process at Unocal's Wilmington, California, Refinery; and United Airlines blade repair facility at the San Francisco Airport.
- Characterized and quantified air emissions for offshore oil and gas development activities associated with Federal oil and gas Lease Sale 95, offshore southern California, for the U.S. Minerals Management Service.

CERTIFICATIONS

- Chemical Engineer, California License 5973
- CARB, Fundamentals of Enforcement Seminar
- EPA Methods 1-8, 17; Training Seminar

AWARDS

- California Energy Commission Outstanding Performance Award 2001

DECLARATION OF
Testimony of Chris Huntley

I**, Chris Huntley,** declare as follows:

1. I am presently employed by Aspen Environmental Group, a contractor to the California Energy Commission's Siting, Transmission and Environmental Protection Division, as a senior associate in biological resources.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on **Biological Resources** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 24, 2010 Signed: _____

At: Agoura Hills, California

CHRISTIAN S. HUNTLEY

Senior Associate/Senior Biologist

ACADEMIC BACKGROUND

Graduate Studies, Biology, California State University Northridge
B.A., Biology, University of California at Santa Cruz, 1992

PROFESSIONAL EXPERIENCE

Mr. Huntley has eleven years of experience with Aspen supporting and managing CEQA/NEPA projects including EIR/EIS, IS/MND, EA, BE/BA, and BA. In addition, Mr. Huntley has extensive experience conducting biological assessments, managing large-scale construction and restoration projects, and supporting agency clients through the Section 7 process. With over 15 years experience as a biologist, Mr. Huntley also has proven experience working with the sensitive biological resources that occur in California. Mr. Huntley has also completed detailed vegetation mapping, sensitive species surveys, and revegetation plans for projects throughout southern California. With extensive experience in managing large scale construction projects, Mr. Huntley has unique experience in resolving conflicts and ensuring compliance with environmental regulations. Supported by a solid background in biological resources, experience in completing CEQA, NEPA, USDA Forest Service Biological Assessments, sensitive species consultation, and over a decade of construction management experience, he works closely with resource agency personnel, contractors and affected jurisdictions to ensure that projects are constructed on time and in compliance with applicable laws, ordinances, regulations and standards.

Aspen Environmental Group — 1998 to present

- **California Energy Commission Emergency Siting Team, Power Plant Development, Compliance Project Manager.** For two years, Mr. Huntley's duties included management of technical staff for the completion of CEQA equivalent environmental permitting for over nine new emergency power plants, review of applicant submittals, drafting of Memoranda of Understanding with Chief Building Officials, conducting audits of building officials, and coordinating with affected agencies to resolve concerns with potential resource impacts. Other duties included maintaining contractor construction milestones, compliance monitoring and reporting, development of mitigation measures and conflict resolution for power plant compliance issues.
- **California Energy Commission Coastal Power Plant Study, Deputy Project Manager/Biologist.** Conducted biological surveys at 21 coastal power plants as part of the CEC's coastal power plant study. Site visits characterized habitat within the footprint of the power plant, landscaping, and identified potential environmental and permitting issues associated with potential expansion of the power plants.
- **California Energy Commission Hydroelectric Power Plant Inventory Study, Deputy Project Manager/Natural Resources Analyst.** Mr. Huntley coordinated a team that collected power and environmental data on over 200 hydroelectric power plants located in California. Physical power data included electrical output, system upgrades, water storage capacity and peaking availability. Environmental information included developing a data base addressing sensitive species issues, fish

screens and ladders, monitoring parameters and a map of known hydroelectric facilities and barriers to anadromous fish passage. Mr. Huntley also obtained water use information on thermal power plants in support of the CEC's bi-annual environmental performance report.

- **Tehachapi Renewable Transmission Line Project California Public Utilities Commission/U.S. Forest Service (2007-2009), Issue Area Coordinator/Biologist.** Mr. Huntley is acting as the issue area coordinator and principal author for biological resources on this 500 kV transmission line proposed by Southern California Edison in support of wind energy projects. This transmission line is 173 miles in length and includes two separate segments that cross the Angeles National Forest. Some of the key issues on this project include potential impacts to Mojave ground squirrel, arroyo toads, California condors, spotted owl, and a host of forest sensitive plant and wildlife species. As part of the project Mr. Huntley mapped over 190 riparian related features and completed extensive surveys of the ANF. Mr. Huntley also managed the completion of comprehensive botanical surveys for the proposed right of way. Other key issues involve the coordination with State Park, Forest, and resource agency staff.
- **El Casco Sub-Transmission Line Project EIR, California Public Utilities Commission (2006-2009), Issue Area Coordinator/Biologist.** Mr. Huntley acted as the issue area coordinator for biological resources and completed the impact analysis section of the EIR for this 17-mile subtransmission line upgrade to be completed by Southern California Edison. This line is located in the Western Riverside Multiple Species Conservation Area and crosses areas supporting several federally protected species including least Bell's vireo, southwestern willow flycatcher, and Stephens' kangaroo rat. Currently, Mr. Huntley provides technical assistance to monitoring staff.
- **Antelope/Pardee Transmission Line Project EIR/EIS-BE/BA, California Public Utilities Commission/U.S. Forest Service (2005-2009), Issue Area Coordinator/Biologist.** Mr. Huntley acted as the issue area coordinator for biological resources on this 500 kV transmission line upgrade to be completed by Southern California Edison. Key issues on this project included compliance with the USFS Forest Plan and sensitive species including California condor, burrowing owl, and rare plants. Mr. Huntley reviewed and prepared the Biological Resource Section for the EIR/EIS, developed project alternatives, coordinated with USFS staff, and conducted sensitive species surveys for arroyo toad in support of this project. Currently, Mr. Huntley provides technical assistance to monitoring staff.
- **Tortoise Monitoring at Las Vegas Wash, U.S. Army Corps of Engineers (2005-2006), Project Manager.** Mr. Huntley managed the survey and report preparation for monitoring activities associated with this task. Monitoring crews conducted work within the Tropicana, Flamingo, and Blue Diamond tributaries as part of the ongoing flood control activities.
- **Devers–Palo Verde Transmission Line Project No. 2 EIR/EIS, California Public Utilities Commission/Bureau of Land Management (2005/2009), Issue Area Coordinator/Biologist.** Mr. Huntley acted as the issue area coordinator for biological resources on this 230-mile 500 kV transmission line upgrade to be completed by Southern California Edison. This project crosses key wildlife areas including the KOFA Wildlife Sanctuary, the San Bernardino National Forest, the Mojave and Sonoran Desert habitat, and sections of the Riverside Multiple Species Conservation Area.
- **Joint Red Flag '05 Exercise Environmental Assessment, U.S. Army Corps of Engineers/ Bureau of Land Management, Nellis Air Force Base Nevada (2004-2005), Project Manager/ Biologist.** Mr. Huntley managed and coordinated the EA process for the ground component of the Joint Red Flag '05 Exercise which was conducted Bureau of Land Management (BLM) lands surrounding Nellis Air Force Base in Lincoln County, Nevada. Mr. Huntley conducted extensive field surveys of the proposed anti-aircraft sites, completed the assessment for biological and visual

resources, prepared the DR/FONSI, managed sensitive species surveys, identified and flagged populations of noxious weeds, and prepared of military training guides for the soldiers in the field.

- **March Air Reserve Base Cactus and Heacock Channels Environmental Assessment and Biological Technical Report U.S. Army Corps of Engineers (2005-2009), Project Manager/Biologist.** Mr. Huntley conducted and managed the preparation of a Biological Technical Report for two channels located along the perimeter of the March Air Reserve Base in Riverside California. Mr. Huntley and a team of biologists conducted burrowing owl surveys, vegetation and vernal pool mapping, and documented existing biological conditions at the two channels. As part of this project detailed GIS maps were created to assist the Corps in preparing environmental documents for the area. Mr. Huntley managed the completion of an Environmental Assessment to evaluate impacts of construction of approximately three miles of flood control channel located at Cactus and Heacock Drainages. Currently, Mr. Huntley provides technical assistance to Corps staff for this project.
- **Patriot Integrated Air Defense Exercise Project Environmental Assessment and Environmental Baseline Survey, Nellis Air Force Base Nevada (2006-2008), Project Manager/Biologist.** Mr. Huntley managed the preparation of an EA for ongoing military activities conducted on Bureau of Land Management (BLM) lands surrounding Nellis Air Force Base in Lincoln and Nye County, Nevada. Mr. Huntley coordinated with the USAF regarding field surveys of the proposed anti-aircraft sites, the assessment of biological and cultural resources, and prepared the DR/FONSI and Right-Of-Way document for the USAF. Mr. Huntley also prepared sections and managed the completion of an Environmental Baseline Report for each of the artillery sites.
- **Lower Colorado Flood Control Project EIR/EIS, U.S. Army Corps of Engineers (2003-2004), Deputy Project Manager/Biologist.** Mr. Huntley conducted reconnaissance surveys and vegetation mapping along a 23-mile section of the Lower Colorado River in Yuma Arizona. In addition, Mr. Huntley updated the biological resource section of the current baseline conditions and is working with a team of State and federal agencies in an effort to determine the future alignment of the Lower Colorado River in this location. As part of this process Mr. Huntley developed project alternatives that met the criteria identified by the United States Boundary Water Commission and State and federal resources agencies.
- **Fort Irwin Environmental Baseline Survey Reports U.S. Army Corps of Engineers (2005), Project Manager/Biologist.** Mr. Huntley managed the preparation of two Environmental Baseline Survey reports near Fort Irwin, San Bernardino County, California to support the land acquisition of over 95 parcels by the U.S. Army for the Fort Irwin National Training Center. Mr. Huntley conducted site investigations, documented existing biological conditions and managed the preparation of the report.
- **Angeles National Forest Fuels Reduction Project, Biological Evaluation/Biological Assessment, U.S. Department of Agriculture Forest Service (2005/2009), Biologist.** Mr. Huntley reviewed existing documents and assisted staff in responding to comments from USFS staff. Mr. Huntley met with USFS staff and conducted site inspections at several plantation and natural stands. Currently, Mr. Huntley is revising BE/BA's for the ANF.
- **Level 3 Fiber Optics Network Construction Monitoring and Supplemental Environmental Review Program, CPUC, Environmental Monitor.** Mr. Huntley's duties included inspection of several southern California segments including Santa Barbara to Burbank, San Bernardino, Corona to Atwood and San Diego to the California/Arizona state line. Environmental compliance during construction addressed biological and cultural resource, air and water quality, traffic control, and public utilities. Other tasks included maintaining daily documentation, review of pre-construction mitigation measures, weekly reporting of compliance activities, and coordination with Level 3 personnel and subcontractors, and affected agencies.

- **Pacific Pipeline Project EIR/EIS for the U.S. Forest Service, Angeles National Forest, and the California Public Utilities Commission, Environmental Monitor.** Served as an Environmental Monitor and supervised mitigation monitoring for all sensitive resources for a construction segment along a 132-mile crude oil pipeline within southern California.
- **SCE Valley-Auld Power Line Project, CPUC, Environmental Monitor.** Conducted inspections of construction of this 11-mile power line upgrade for compliance with the project's Mitigated Negative Declaration mitigation measures and compliance plans. Other tasks included review of pre-construction compliance materials, maintaining inspection documentation, and coordination with SCE and its subcontractors.
- **Piru Creek Repairs Project IS/MND, California Department of Water Resources, Biologist.** Mr. Huntley completed sections of the U.S. Forest Service Biological Assessment/Biological Evaluation, and biological technical report for the Piru Creek Repairs Project. In addition, Mr. Huntley has conducted sensitive species surveys and coordinated with CDFG, USFS and RWQCB regarding permits and sensitive species issues.
- **Compliance and Mitigation Development, California Public Utilities Commission, State Lands Commission, California Department of Water Resources, Biologist.** Working with technical experts Mr. Huntley developed mitigation measures for a number of State and federal projects including the Kinder Morgan pipeline, Santa Ana pipeline and Viejo transmission line project.
- **San Antonio Creek Erosion Repairs Project BA/EA, U.S. Army Corps of Engineers, Biologist.** Mr. Huntley conducted botanical surveys and prepared detailed vegetation maps within San Antonio Creek. Mr. Huntley also prepared the Biological and Environmental Assessments for the project and developed mitigation for sensitive plant and wildlife species.
- **Santa Fe Pacific Pipeline, CPUC, Environmental Monitor.** Inspected construction of three petroleum distribution station sites for compliance with approved project mitigation measures and compliance plans.

SELECTED TECHNICAL EXPERIENCE/TRAINING AND CERTIFICATIONS

- SWPPP trained 2006
- California Energy Commission Outstanding Performance Award, 2001
- CDFG Scientific Collecting Permit for pond turtle and garter snake.
- Certified Caltrans Horizontal Directional Drilling Inspector 2001
- Desert Tortoise Handling Workshop, Ridgecrest California 2001
- CEC Expert Witness Training 2001
- Railroad Right-of-Way Safety Training 2002
- Small boat handling, licensed and certified since 1993
- Research Scuba-diving certification and training since 1989

DECLARATION OF
Testimony of Scott D. White

I, **Scott D. White,** declare as follows:

1. I am presently employed by Aspen Environmental Group, a contractor to the California Energy Commission's Siting, Transmission and Environmental Protection Division, as a senior associate in botany.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on **Biological Resources** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements thereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 22, 2010 Signed: Scott D White

At: Upland, California

Aspen
Environmental Group

SCOTT D. WHITE

Senior Associate/Senior Biologist

ACADEMIC BACKGROUND

MA, Biology, 1992 and BA, Biology, 1981, Humboldt State University; Secondary Teaching Credential, Life Science, 1982

PROFESSIONAL EXPERIENCE

Scott D. White holds Bachelor's and Master's degrees in biology from Humboldt State University and has over 17 years experience including NEPA, CEQA and SMARA compliance. His primary experience is with southern California floristics and vegetation, including wetlands, coastal sage scrub, chaparral, and forests. He is well experienced with the regional flora, including rare, threatened, and endangered species and is a coauthor of *Vascular Plants of Western Riverside County: An Annotated Checklist*. Mr. White has recently joined Aspen in the firm's Inland Empire office after working for a number of years as a subcontractor to Aspen. He has performed field surveys and analyzed biological resources professionally in California since 1987. His projects have included biological and cumulative impacts analyses; focused surveys for special status species in a variety of habitats; design and implementation of monitoring plans and land management plans; data collection and analysis in coastal sage scrub, chaparral, oak woodlands, desert shrublands and pinyon woodlands; wetlands delineations and mitigation plans for state and federal permitting; upland revegetation plans for mine reclamation; recovery plans for listed T/E species; and interagency planning efforts for long-term land use and conservation planning on public and private lands. He has extensive experience with federal, state and local agencies and has published a number of studies.

Aspen Environmental Group **2009 to present**

Mr. White has recently begun at Aspen. Below are samples of work he previously performed as a subcontractor to Aspen.

- **Newhall Ranch Specific Plan EIR and Sect. 2081 Review, (2006-2010), California Department of Fish and Game.** Document review and comment, agency/applicant meetings and consultation, responses to comments in support of CDFG CEQA and state Endangered Species Act project review, including conservation planning and 2081 Incidental Take Permit document production addressing listed San Fernando Valley spineflower and other biological impacts.
- **Tehachapi Renewal Transmission Project (2008), California Public Utilities Commission/US Forest Service.** Field surveys for rare, threatened and endangered plants on powerline corridor and alternate routes in Chino/Puente Hills, San Gabriel Mountains, Los Angeles Basin, and Inland Empire areas, Los Angeles, Orange, San Bernardino, and Riverside counties.
- **Alta-Oak Creek Wind Project (2008), Kern County**. Vegetation mapping and text descriptions of vegetation and habitat; and review and update of applicant's botanical survey reports, in support of CEQA compliance.

Scott White Biological Consulting and other consulting 1989 to 2009

Consulting Biologist: Scott White Biological Consulting; White & Leatherman BioServices 1998-present; Psomas and Associates, 1995-1998; Tierra Madre Consultants 1989-1995. Mr. White performed biological surveys, report preparation (to meet requirements of CEQA, NEPA, SMARA, state and federal wetlands requirements, and local planning policies), client contact, and agency coordination. Specialties include rare plant surveys, wetlands delineations, vegetation sampling and description, habitat characterization (e.g., suitability for rare wildlife species), revegetation planning, and mitigation design.

Representative projects include the following:

- **Proposed Improvements: State Hwy 79 (2006) and I-215 (2008)**: Field surveys for rare, threatened and endangered plants on numerous public and private parcels on a series of alternate roadway alignments, western Riverside County.
- **San Bernardino National Forest / Rancho Santa Ana Botanic Garden (2008-ongoing):** Field surveys for rare, threatened and endangered plants in San Jacinto and San Bernardino Mountains. (meadows, pebble plains, etc.) in San Bernardino and Riverside counties.
- **West Coast Aggregate tortoise surveys, Biological Technical Reports, Revegetation Plans (1999-2007)**: Field surveys, data collection and analysis; and technical reports and plans for several mining plan revisions, per CEQA and Mining and Reclamation Act; Coachella Valley, Riverside County (many similar surveys and reports for mining and planning projects throughout S. California, 1989-present).
- **Lucerne Valley-Big Bear Lake Fiber Optic Cable (2005)**: Field surveys and impacts analysis for rare, threatened and endangered plants on cable route from desert floor to Big Bear Lake area; wrote Biological Assessment per National Forest guidelines; managed and directed construction monitoring per National Forest requirements, San Bernardino County.
- **Proposed Fort Irwin Gas Pipeline (2004-2005)**: Field surveys and impacts analysis for rare, threatened and endangered plants and animals (including desert tortoise, Lane Mountain milk vetch, and others) on proposed pipeline alignments totaling ca. 66 linear miles, San Bernardino County.
- **San Bernardino National Forest/Wildlands Conservancy (2004):** Field surveys and descriptions of vegetation and flora on series of public and private parcels in mountains and desert foothills for impact assessment of proposed land exchange; San Bernardino County.
- **Angeles National Forest Botanical Surveys (2004):** Field surveys and impacts analysis for rare, threatened and endangered plants on ANF project sites for fuel management, transportation, and recreation; San Gabriel Mountains, Los Angeles and San Bernardino counties.
- **Carbonate Habitat Management Strategy (1999-2004):** Document review and comment, agency/industry meetings and consultation, in support of limestone mining industry in preparation of federal Endangered Species Act compliant management plan to resolve land use conflicts among mining and listed threatened/endangered limestone endemic plants on mining claims in the San Bernardino National Forest, San Bernardino County.
- **Botanical Field Guide (2004):** Field surveys, specimen preparation, photography, and text for botanical field guide for the Soboba Indian Reservation, San Jacinto Mountain foothills, western Riverside County.
- **Draft Recovery Plan for Three Desert *Astragalus* Species (2004-2007):** Review and compilation of specimen data, field survey reports, agency planning documents and conservation biology literature to prepare draft recovery plan per US Fish and Wildlife Service specifications; San Bernardino, Riverside, and Imperial Counties.

- **Foothill Transportation Corridor South (2003):** Field surveys for special status plants including thread-leaved brodiaea on proposed alternate road alignments, Santa Ana Mountain foothills, Orange County.
- **United States Gypsum (2002-2007):** Field surveys for special status plants and animals on proposed quarry expansion lands; Biological Technical Report and detailed Responses to Comments for joint EIR/EIS for Imperial County and USDI Bureau of Land Management.
- **Los Angeles County Department of Public Works (2002-03):** Field surveys for threatened or endangered plants (e.g., Braunton's milk vetch) in existing and proposed flood control channels and debris basins, Santa Clarita Valley and San Gabriel Mtn. foothills, Los Angeles County.
- **Lake Arrowhead dredging sites (2001):** Field surveys, Biological Technical Report and Wetlands Delineation for dredging by Arrowhead Lake Association at inlet channels, including habitat assessment for mountain yellow-legged frog and rare plants. San Bernardino Mountains, San Bernardino County.
- **I-15 Corridor, Escondido - Miramar (1999):** Focused field surveys for sensitive, threatened, and endangered plants (including San Diego Mesa mint) on ca. 20-mile corridor in support of long-term transportation planning; San Diego County.

Botanist: San Bernardino National Forest **1987-1989**

Team leader for data collection and assisted in data analysis for vegetation management planning and ecosystem classification; assisted in analysis and interpretation of vegetation data, leading to a classification system of southern California chaparral; provided mapping and implementation recommendations for prescribed burn planning and other habitat management projects; assisted in vegetation sampling of California spotted owl territories; prepared Environmental Assessments in compliance with NEPA.

SELECTED TECHNICAL EXPERIENCE/TRAINING AND CERTIFICATIONS

- Planning and land use policies, including mitigation banking, to mitigate ongoing loss of native habitats.
- Use of quantitative data and multivariate statistics to classify plant communities and wildlife habitat.
- Occurrence and distributions of native and naturalized plants in Southern California particularly in the Inland Empire and surrounding mountain ranges.
- Role of fire and other natural disturbance in southern California shrublands and forests.
- Effects of brown headed cowbird nest parasitism on native bird populations, and potential application of habitat management to reduce parasitism rates.

CERTIFICATIONS

California Dept. of Fish and Game and USDI Fish and Wildlife Service authorization to collect listed endangered, threatened and rare plants (Research Association permittee under RSABG permits)

SERVICE

- Vegetation Committee; California Native Plant Society (member 1990-1998; acknowledged reviewer of *A Manual of California Vegetation*, J.O. Sawyer & T. Keeler-Wolf (1st ed. 1995, 2nd ed. 2009).
- Guest editor; *Fremontia* Coastal Sage Scrub special issue (October 1995).

- Field trip leader and training seminar instructor for local volunteer organizations including The Crafton Hills Conservancy, The Riverside Land Conservancy, The San Bernardino Valley Audubon Society, California Native Plant Society, and Rancho Santa Ana Botanic Garden.
- Peer reviewer of Federal Register listing proposals and critical habitat proposals, US Fish and Wildlife Service (2004-present).
- Southern California Botanists Board of Directors (1997-2002); President (1999-2000); peer reviews for SCB journal *Crossosoma* (1997-present); Co-editor, *Crossosoma* (effective 2009).
- Research Associate, Rancho Santa Ana Botanic Garden and U.C. Riverside Herbarium

MEMBERSHIPS

California Botanical Association

California Native Plant Society

Southern California Academy of Sciences

The Wildlife Society

Arizona Native Plant Society

Southwestern Association of Naturalists

Southern California Botanists

PROFESSIONAL PRESENTATIONS

- "Critiquing Botanical Consulting from a 20 Year Perspective," presented at California Native Plant Society State-wide conference, Sacramento, 2009.
- "Conservation Planning for Limestone endemic Plants in the Northern San Bernardino Mountains," presented at Southern California Botanists annual symposium, Cal State Fullerton, 2002.
- With Orlando Mistretta: "Introducing Two Federally Listed Carbonate endemic Plants onto a Disturbed Site in the San Bernardino Mountains, California," presented at 3rd Southwestern Rare Plant Symposium, Flagstaff, Arizona, September 2000.
- "Structure and Function in Southern California Chaparral," presented at Southern California Botanists annual symposium, Cal State Fullerton, 1997.
- With Martha Blane: "Planning and Monitoring for Ecological Function," presented at Society for Ecological Restoration California Chapter annual conference, Yosemite National Park, 1996.
- "Vegetation Descriptions, Site Characteristics, and Plant Ecology in Puente Hills Shrublands," presented at Symposium on Natural Resources in the Puente Hills Chino Hills Corridor, Whittier College, 1994.

DECLARATION OF
Carolyn Chainey-Davis

I**, Carolyn Chainey-Davis,** declare as follows:

1. I am presently under contract with Aspen Environmental Group to provide environmental technical assistance to the California Energy Commission. Under Contract No. 700-05-002, I am serving as an Associate Biological Resource Specialist, Level II, to provide Peak Workload Support for the Energy Facility Siting Program and for the Energy Planning Program.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on **Biological Resources** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated:_____ Signed: Original Signed by C. Chainey-Davis

At: Nevada City, California

Carolyn Chainey-Davis, botanist

Over 23 years experience conducting biological inventories and impact assessments, rare plant and noxious weed surveys, large-scale vegetation mapping, wetland delineations, large-scale watershed assessments, designing and implementing mitigation & monitoring plans, habitat management plans, and restoration plans throughout California. Ms. Chainey-Davis field experience includes a diverse group of clients and projects from large transmission and hydro relicensing projects to urban and residential development projects, local, state and federal agencies, resource conservation organizations, landfill and mine reclamation projects, and many more. She led Garcia and Associates (GANDA) botanical studies for numerous FERC relicensing projects (PG&E & SCE) including Stanislaus River, Upper North Fork Feather River, Pit River, Vermillion, Bucks Lake and Poe hydro-relicensing projects, Transmission Separation project, Lower Owens River riparian monitoring, and hundreds of other large and small projects around the state.

Ms. Davis is past President of the California Native Plant Society, Nevada and Placer County Chapter and is a co-author of the recently published field guide "*Wildflowers of Nevada and Placer Counties*", published by the California Native Plant Society. Ms. Davis completed her wetland training at Portland State University and is certified for conducting wetland delineations based on the U.S. Army Corps of Engineers Wetland Delineation Manual. Ms. Chainey-Davis is skilled in the use of Trimble GeoExplorer series Global Positioning (GPS) equipment. As a botanist, she apprenticed for several years under some of the state's leading botanists, vegetation and wetland ecologists, including Robert Holland. Ms. Davis' continuing education includes several annual intensive botanical taxonomy workshops through the U.C. Berkeley Jepson Herbarium.

A Sampling of Relevant Project Experience

Project: **Beacon Solar Energy Project Rosamond Water Alternative**
Client: **California Energy Commission (CEC)**
Conducted detailed habitat assessment and vegetation mapping for a 40-mile alternative water pipeline alignment near Mojave, CA, in support of the Final Staff Assessment. CEC evaluated the feasibility of BSEP using an alternative source of water other than onsite potable groundwater and identified City of Rosamond tertiary treated wastewater as a feasible source. Prepared supplemental report describing the vegetation resources occurring along the southern 23 miles of the 39.61-mile Rosamond water pipeline alignment, including vegetation mapping and a rare plant habitat assessment. Assisted staff in the impact assessment for the proposed and preferred alternative.

Project: **Lower Owens River Monitoring Program**
Client: **Ecosystem Sciences**
Member of a team of three biologists to design long-term monitoring program for collecting and analyzing data on riparian habitat and key wildlife habitat characteristics on 62 miles of the Lower Owens River. Directed field efforts to collect baseline data at 350 sites. Future monitoring, conducted after the initiation of appropriate flow and land management practices, will be compared against the baseline to determine if changes resulting from proposed restoration efforts (augmented stream flows) are consistent with the LORP goals and objectives.

Project: **Open ended Contract for Biological Services**
Client: **Southern California Edison (SCE)**
Led Garcia and Associates (GANDA) botanical studies (vegetation mapping, habitat assessments, etc.) in support of various SCE construction and relicensing projects in the central and southern Sierras, Sierra east slope and Great Basin region, and the eastern edge of the San Joaquin Valley.

182 Grove Street Nevada City, CA 95959 [ph] 530.478.1963 [cell] 530.205.6218 bighair60@att.net

Project: **Stanislaus River Hydroelectric Project Relicensing Studies**
Client: **Pacific Gas and Electric Company, Technical and Ecological Services**
Led GANDA field efforts to conduct floristically-based botanical studies for the Federal Energy Regulatory Commission relicensing of four hydroelectric and transmission line projects located on the Stanislaus River, Stanislaus National Forest. Riparian and watershed vegetation mapping and sampling, special-status plant surveys, noxious weed mapping, and identify and map culturally significant Native American botanical resources for local tribes in support of the Federal Energy Regulatory Commission relicensing process. Prepared draft and final reports.

Project: **Owens Lake Dust Control Project**
Client: **Garcia and Associates**
Conducted two years of floristically-based special status plant surveys and wetland delineations for the Los Angeles Department of Water and Power Owens Lake Dust Control mitigation project.

Project: **Kern River Natural Gas Pipeline**
Client: **Garcia and Associates**
Conducted floristically-based special status plant surveys for the Daggett and Goodsprings segments of the interstate pipeline.

Project: **Pit River Hydroelectric Project Relicensing Studies**
Client: **Pacific Gas and Electric Company, Technical and Ecological Services**
Led field efforts to conduct floristically-based special status plant surveys, noxious weed surveys, upland habitat mapping, and riparian vegetation classification and mapping for PG&E's Pit 3, 4, and 5 hydroelectric project in Shasta County in support of the Federal Energy Regulatory Commission relicensing process. Prepared draft and final reports.

Project: **Upper North Fork Feather River and Poe Hydroelectric Projects, Lake Almanor Habitat Management Plan**
Client: **Pacific Gas and Electric Company, Technical and Ecological Services**
Led field efforts to conduct floristic surveys for special-status plant species and noxious weeds on the Upper North Fork Feather River (Plumas and Lassen National Forests) and Poe Project Included GIS-based riparian and upland vegetation mapping in support the Federal Energy Commission relicensing process. Prepared draft and final reports. Also conducted detailed mapping of the wet meadows around Lake Almanor and prepared a long-term habitat management plan for meadow resources and willow flycatcher habitat.

Project: **Transmission Separation Project**
Client: **Foster Wheeler Environmental Corporation**
Led field efforts to conduct floristically-based special-status plant surveys and noxious weed surveys for the PG&E Transmission Separation Project. GANDA botanists conducted surveys on selected transmission line segments and their associated access roads on USDA Forest Service (USFS) lands in the Plumas, Shasta-Trinity, Tahoe, and Eldorado National Forests, created GIS-based vegetation and noxious weed maps, and analyzed potential threats to special-status plant populations. Prepared draft and final reports.

Project: **Nevada and Placer County projects – large and small subdivisions, infrastructure development, etc.**
Client: **Susan Sanders Biological Consulting and Beedy Environmental Consulting**
Conducted biological inventory and impact analyses and prepared mitigation plans for over 100 large and small subdivisions and infrastructure development projects in Nevada and Placer County. Lead writer and botanist. All projects included vegetation mapping, habitat assessments, floristic surveys, and mitigation planning. Prepared detailed habitat management plans and recreation/ trail plans for over a thousand acres of open space.

Project: **Dog Ranch-Salmon Creek Conservation Project**
Client: **Robert Holland**
Conducted endangered species surveys and documented over 300 occurrences of special status plants (using Trimble data dictionary and population sampling protocol) for a proposed conservation easement/land swap on a 400+ acre ranch in Humboldt County on the Samoa Peninsula.

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Project: **Field Guide to *Epilobium* in the Sierra Nevada, Tahoe National Forest**
Client: **U.S.D.A. Forest Service, Tahoe and Inyo National Forests (Open-ended Contract)**
Conducted surveys for rare *Epilobiums* at seven sites in the Tahoe and Inyo National Forests and prepared a field guide to the genus *Epilobium* in the Sierra Nevada, with illustrations and keys to identification.

Project: **Bear Valley Meadow Restoration**
Client: **American Rivers**
Sample design and long-range monitoring design and protocol for a large-scale meadow restoration project in Placer County. Included detailed vegetation mapping, conducting baseline inventory, and preparing report on sample design and results of baseline monitoring.

Project: **Shirttail Creek Conservation Easement**
Client: **Beedy Environmental Consulting for Conservation Biology Institute**
Conducted biological inventory and conservation assessment for 800-acre property on Shirttail Creek in the American River watershed using protocol developed by The Nature Conservancy for conservation planning. Lead writer and botanist.

Project: **Natural Heritage 2020 Nevada County Watershed Assessment**
Client: **County of Nevada and Sierra Business Council**
Lead botanist for a countywide watershed and ecosystem assessment. A two-year process funded by the Sierra Business Council and the County of Nevada to create a GIS database and biotic inventory of the county's natural habitats and wildlife resources, including an assessment of vegetation, special status and invasive for 98 sub-watershed basins in the county. Prepared botanical sections of the report, verified accuracy of more than 40 GIS data themes, assessed the extent and quality of each of the county's ecosystem types, potential to support special-status plants and animals.

Project: **Special Status Plant Surveys and Habitat Mapping for Rock Creek/Cresta Hydroelectric**
Client: **Pacific Gas and Electric Company, Technical and Ecological Services**
Conducted floristically-based special status plant surveys and habitat mapping for PG&E's Rock Creek-Cresta hydroelectric facility project area and 72-mile transmission line in Plumas, Butte, Yuba and Sutter counties.

Project: **Osborne Hill Open Space Habitat Management Plan**
Client: **Susan Sanders Biological Consulting**
Prepared detailed, goal-driven, long-range habitat management plan for 250 acres of open space for a residential development in Nevada County. Included guidelines for forest management to promote old-growth conditions, fuels management specifications, habitat management specifications, and designs and implementation plan for recreational trails, educational signage, and formation of an independent non-profit land trust to manage the open space. Prepared similar plans for several other residential developments in Nevada County.

Project: **Ragsdale Creek Setback Study**
Client: **Susan Sanders Biological Consulting & County of Nevada**
Identified, described, and mapped important biological resources on an urban stream in Nevada County and recommended appropriate development setbacks to avoid/minimize impacts, assessed potential impacts to the creek as a result of adjacent development, and recommended mitigation measures to reduce impacts. Coordinated with County GIS Department in production of map of sensitive resources, and presented results of study to citizen advisory committee.

Project: **Open ended Contract for Biological Services, Various Transmission Projects**
Client: **Pacific Gas & Electric Company (PG&E)**
Led Garcia and Associates (GANDA) botanical studies (rare plant surveys, vegetation mapping, habitat assessments, etc.) in support of various PG&E transmission projects throughout California, including Kern #304, Northeast San Jose Reinforcement, Atlantic-Del Mar, Butte Reinforcement, and many more.

Project: **Open ended Contract for Biological Services, Transmission Relicensing Projects**
Client: **Southern California Edison (SCE)**
Led Garcia and Associates (GANDA) botanical studies (vegetation mapping, habitat assessments, etc.) in support of various SCE construction and relicensing projects in the central and southern Sierras, Sierra east slope and Great Basin region, and the eastern edge of the San Joaquin Valley.

182 Grove Street Nevada City, CA 95959 [ph] 530.478.1963 [cell] 530.205.6218 bighair60@att.nett

DECLARATION OF
Dal Hunter, Ph.D., C.E.G

I**, Dal Hunter, Ph.D., C.E.G** declare as follows:

1. I am presently employed as a subcontractor to Aspen Environmental Group a Contractor to the California Energy Commission, Systems Assessment and Facilities Siting Division, as an Engineering Geologist.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I prepared the staff testimony on **Geology and Paleontology and Geologic Stability** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated:_____ Signed: Original Signed by D. Hunter

At: Reno, Nevada

Robert D. Hunter, Ph.D., C.E.G.
Engineering Geologist
Vice President

Education

- Ph.D. – Geology – 1989 – University of Nevada, Reno
- M.S. – Geology – 1976 – University of California - Riverside
- B.S. – Earth Science – 1972 – California State University, Fullerton

Registrations

- Registered Geologist – California
- Certified Engineering Geologist – California
- Professional Geological Engineer – Nevada

Experience

1997 to Present: Black Eagle Consulting, Inc.; Vice President. Dr. Hunter is in charge of all phases of geological, geotechnical, and geochemical projects and is responsible for conducting, coordinating, and supervising geotechnical investigations for public and private sector clients. He has worked on numerous industrial and commercial projects over the last 30 years. Dr. Hunter is very familiar with state and federal design specifications as well as CEQA and NEQA requirements related to geology and paleontology.

Dr. Hunter has also provided geological, geotechnical, and paleontological review and written and oral testimony for California Energy Commission (CEC) power plant projects including:

- El Segundo Power Redevelopment Project (including compliance monitoring)
- Magnolia Power Project (including compliance monitoring)
- Ocotillo Energy Project (Wind Turbines)
- Vernon-Malburg Generating Station
- Inland Empire Energy Center (including compliance monitoring)
- Palomar Energy Project
- Henrietta Peaker Project
- BP Carson Peaker Project
- East Altamont Energy Center
- Avenal Energy Center
- Teayawa Energy Center monitoring
- Walnut Energy Center (including compliance monitoring)
- Riverside Energy Resource Center
- Salton Sea Unit 6 (Geothermal Turbines)
- National Modoc Power Plant
- Pastoria Energy Center
- Walnut Creek Energy Park
- Sun Valley Energy Project
- El Centro Unit 3 Repower Project

- AES Highgrove Project
- South Bay Replacement Project
- Vernon Power Plant
- Bullard Energy Center Project
- Humboldt Bay Repowering Project (including compliance monitoring)
- Victorville Power Project
- Carlsbad Energy Center
- San Gabriel Generating Station
- Orange Grove
- Chula Vista Energy Upgrade
- Carrizo (Solar)
- KRCD Community Power
- Carrizo Power Plant (including compliance monitoring)
- Sentinel Peaker Project
- Canyon Power Plant
- Riverside Acorn SPPE Project
- Beacon Solar Generating Station
- Stirling 2 Solar Project
- Stirling 1 Solar Project
- City of Palmdale
- eSolar1 Solar Generating Project
- Otay Mesa Generating Project (compliance monitoring)
- Montainview Power Plant Project (compliance monitoring)
- Consumes Power Plant (compliance monitoring)
- Sunrise Power Project (compliance monitoring)
- Niland Power Project (compliance monitoring)
- Panoche Power Plant (compliance monitoring)
- Colusa Generating Station (compliance monitoring)
- Starwood Power Plant (compliance monitoring)
- Los Mendanos Power Plant (compliance monitoring)
- Blythe Combined Cycle Plant (compliance monitoring)
- Roseville Energy Plant (compliance monitoring)

Attended Expert Witness Training Sponsored by CEC.

1978 to 1997: SEA, Incorporated; Geotechnical Manager, Engineering Geologist. Dr. Hunter was in charge of all phases of geotechnical projects for SEA, including project coordination and supervision, field exploration, geotechnical analysis, slope stability analysis, soil mechanics, engineering geochemistry, mineral and aggregate evaluations, and report preparation. Numerous investigations were undertaken on military, commercial, industrial, airport, residential, and roadway projects. He worked on many geothermal power plants, providing expertise in foundations design, slope stability, seismic assessment, geothermal hazard evaluation, expansive clay, and settlement problems. Project types included high-rise structures, airports, warehouses, shopping centers, apartments, subdivisions, storage tanks, roadways, mineral and aggregate evaluations, slope stability analyses, and fault studies.

1977 to 1978: Fugro (Ertec) Incorporated Consulting Engineers and Geologists; Staff Engineering Geologist; Long Beach, California.

Affiliations

- Association of Engineering Geologists

Publications

- Hunter, 1988, *Lime Induced Heave in Sulfate Bearing Clay Soils*, Journal of Geotechnical Engineering, ASCE, Vol. 14, No. 2, pp. 150-167.

- Hunter, 1989, *Applications of Stable Isotope Geochemistry in Engineering Geology*: Proceedings of the 25th Annual Symposium on Engineering Geology and Geotechnical Engineering.

- Hunter, 1993, *Evaluation of Potential Settlement Problems Related to Salt Dissolution in Foundation Soils*: Proceedings of the 29th Annual Symposium on Engineering Geology and Geotechnical Engineering.

DECLARATION OF
Rick Tyler

I**, Rick Tyler,** declare as follows:

1. I am presently employed by the California Energy Commission in the Facilities Siting, Transmission, and Environmental Protection Division as a **Senior Mechanical Engineer.**

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I assisted in the preparation of the staff testimony on **Hazardous Materials Management and Worker Safety and Fire Protection** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated:_____ Signed: Original Signed by R. Tyler

At: Sacramento, California

RICK TYLER

Associate Mechanical Engineer

CALIFORNIA ENERGY COMMISSION

EDUCATION B.S., Mechanical Engineering, California State University, Sacramento. Extra course work in Statistics, Instrumentation, Technical Writing, Management; Toxicology, Risk Assessment, Environmental Chemistry, Hazardous Materials Management, Noise Measurement, and regulations regarding control of toxic substances.

Near completion of course work necessary to obtain a certificate in hazardous materials management from University of California, Davis.

EXPERIENCE

Jan. 1998-Present — California Energy Commission - Senior Mechanical Engineer
Energy Facility Siting and Environmental Protection Division

Responsible for review of Applications for Certification (applications for permitting) for large power plants including the review of handling practices associated with the use of hazardous and acutely hazardous materials, loss prevention, safety management practices, design of engineered equipment and safety systems associated with equipment involving hazardous materials use, evaluation of the potential for impacts associated with accidental releases and preparation and presentation of expert witness testimony and conditions of certification. Review of compliance submittals regarding conditions of certifications for hazardous materials handling, including Risk Management Plans Process Safety Management.

April 1985-Jan. 1998 — California Energy Commission - Health and Safety
Program Specialist; Energy Facility Siting and Environmental Protection Division.

Responsible for review of Public Health Risk Assessments, air quality, noise, industrial safety, and hazardous materials handling of Environmental Impact Reports on large power generating and waste to energy facilities, evaluation of health effects data related to toxic substances, development of recommendations regarding safe levels of exposure, effectiveness of measures to control criteria and non-criteria pollutants, emission factors, multimedia exposure models. Preparation of testimony providing Staff's position regarding public health, noise, industrial safety, hazardous materials handling, and air quality issues associated with proposed power plants. Advise Commissioners, Management, other Staff and the public regarding issues related to health risk assessment of hazardous materials handling.

Nov. 1977-
April 1985

California Air Resources Board - Engineer (last 4 years Associate level)

Responsible for testing to determine pollution emission levels at major industrial facilities; including planning, supervision of field personnel, report preparation and case development for litigation; evaluate, select and acceptance-test instruments prior to purchase; design of instrumentation systems and oversight of their repair and maintenance; conduct inspections of industrial facilities to determine compliance with applicable pollution control regulations; improved quality assurance measures; selected and programmed a computer system to automate data collection and reduction; developed regulatory procedures and the instrument system necessary to certify and audit independent testing companies; prepared regulatory proposals and other presentations to classes at professional symposia and directly to the Air Resources Board at public hearings. As state representative, coordinated efforts with federal, local, and industrial representatives.

PROFESSIONAL AFFILIATIONS/ LICENSES

Past President, Professional Engineers in California Government Fort Sutter Section;
Past Chairman, Legislative Committee for Professional Association of Air Quality Specialists. Have passed the Engineer in Training exam.

PUBLICATIONS, PROFESSIONAL PRESINTATIONS AND ACCOMPLISHMENTS

Authored staff reports published by the California Air Resources Board and presented papers regarding continuous emission monitoring at symposiums.

Authored a paper entitled "A Comprehensive Approach to Health Risk Assessment", presented at the New York Conference on Solid Waste Management and Materials Policy.

Authored a paper entitled "Risk Assessment A Tool For Decision Makers" at the Association of Environmental Professionals AEP Conference on Public Policy and Environmental Challenges.

Conducted a seminar at University of California, Los Angeles for the Doctoral programs in Environmental Science and Public Health on the subject of "Health Risk Assessment".

Authored a paper entitled "Uncertainty Analysis -An Essential Component of Health Risk Assessment and Risk Management" presented at the EPA/ORNL expert workshop on Risk Assessment for Municipal Waste Combustion: Deposition, Uncertainty, and Research Needs.

Presented a talk on off-site consequence analysis for extremely hazardous materials releases. Presented at the workshop for administering agencies conducted by the City of Los Angeles Fire Department.

Evaluated, provided analysis and testimony regarding public health and hazardous materials management issues associated with the permitting of more than 20 major power plants throughout California.

Developed Departmental policy, prepared policy documents, regulations, staff instruction, and other guidance documents and reference materials for use in evaluation of public health and hazardous materials management aspects of proposed power plants.

Project Manager on contracts totaling more than $500,000.

RES.RT

DECLARATION OF
Alvin J. Greenberg, Ph.D.

I**, Alvin J. Greenberg, Ph.D.** declare as follows:

1. I am presently a **consultant** to the **California Energy Commission, Energy Facilities Siting and Environmental Protection Division.**

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on the **Hazardous Materials Management, and Public Health and Safety** sections for the **Calico Solar Project** based on my independent analysis of the amendment petition, supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: _____ Signed: Original Signed by A. Greenberg

At: Sacramento, California

Risk Science Associates

121 Paul Dr., Suite A, San Rafael, Ca. 94903-2047
415-479-7560 fax 415-479-7563
e-mail agreenberg@risksci.com

Name & Title: **Alvin J. Greenberg, Ph.D., FAIC, REA, QEP**
Principal Toxicologist

Dr. Greenberg has had over two decades of complete technical and administrative responsibility as a team leader in the preparation of human and ecological risk assessments, air quality assessments, hazardous materials handling and risk management/prevention, infrastructure vulnerability assessments, occupational safety and health, hazardous waste site characterization, interaction with regulatory agencies in obtaining permits, and conducting lead surveys and studies. He has particular expertise in the assessment of dioxins, lead, diesel exhaust, petroleum hydrocarbons, mercury, the intrusion of subsurface contaminants into indoor air, and the preparation and review of public health/public safety sections of EIRs/EISs. Dr. Greenberg's expertise in risk assessment has led to his appointment as a member of several state and federal advisory committees, including the California EPA Advisory Committee on Stochastic Risk Assessment Methods, the US EPA Workgroup on Cumulative Risk Assessment, the Cal/EPA Peer Review Committee of the Health Risks of Using Ethanol in Reformulated Gasoline, the California Air Resources Board Advisory Committee on Diesel Emissions, the Cal/EPA Department of Toxic Substances Control Program Review Committee, and the DTSC Integrated Site Mitigation Committee. Dr. Greenberg is the former Chair of the Bay Area Air Quality Management District Hearing Board, a former member of the State of California Occupational Health and Safety Standards Board (appointed by the Governor), and former Assistant Deputy Chief for Health, California OSHA. And, since the events of 9/11, Dr. Greenberg has been the lead person for developing vulnerability assessments, power plant security programs, and conducting safety and security audits of power plants for the California Energy Commission and has assisted the CEC in the assessment of safety and security issues for proposed LNG terminals. In addition to providing security expertise to the State of California, Dr. Greenberg was the Team Leader and main consultant to the State of Hawaii on the updating of their Energy Emergency Preparedness Plan.

Years Experience: 26

Education:

B.S. 1969 Chemistry, University of Illinois Urbana

Ph.D. 1976 Pharmaceutical/Medicinal Chemistry, University of California, San Francisco

Postdoctoral Fellowship 1976-1979 Pharmacology/Toxicology, University of California, San Francisco

Postgraduate Training 1980 Inhalation Toxicology, Lovelace Inhalation Toxicology Research Institute, Albuquerque, NM

Professional Registrations:

Board Certified as a Qualified Environmental Professional (QEP)
California Registered Environmental Assessor - I (REA)
Fellow of the American Institute of Chemists (FAIC)

Professional Affiliations:

Society for Risk Analysis
Air and Waste Management Association
American Chemical Society
American Association for the Advancement of Science
National Fire Protection Association

Technical Boards and Committee Memberships - Present:

Squaw Valley Technical Review Committee
(appointed 1986)

Technical Boards and Committee Memberships - Past:

July 1996 – March 2002
Member, Bay Area Air Quality Management District Hearing Board
(Chairman 1999-2002)
September 2000 – February 2001
Member, State Water Resources Control Board Noncompliant Underground Tanks Advisory Group
January 1999 – June 2001
Member, California Air Resources Board Advisory Committee on Diesel Emissions
January 1994 - September 1999
Vice-Chairman, State Water Resources Control Board Bay Protection and Toxic Cleanup Program Advisory Committee
September 1998
Member, US EPA Workgroup on Cumulative Risk Assessment
April 1997 - September 1997
Member, Cal/EPA Private Site Manager Advisory Committee
January 1986 - July 1996
Member, Bay Area Air Quality Management District Advisory Council
(Chairman 1995-96)
January 1988 - June 1995
Member: California Department of Toxic Substance Control Site Mitigation Program Advisory Group
January 1989 - February 1995
Member: Department of Toxics Substances Control Review Committee, Cal-EPA

October 1991 - February 1992
Chair: Pollution Prevention and Waste Management Planning Task Force of the Department of Toxics Substances Control Review Committee, Cal-EPA

September 1990 - February 1991
Member: California Integrated Waste Management Board Sludge Advisory Committee

September 1987 - September 1988
ABAG Advisory Committee on Regional Hazardous Waste Management Plan

March 1987 - September 1987
California Department of Health Services Advisory Committee on County and Regional Hazardous Waste Management Plans

January 1984 - October 1987
Member, San Francisco Hazardous Materials Advisory Committee

March 1984 - March 1987
Member, Lawrence Hall of Science Toxic Substances and Hazardous Materials Education Project Advisory Board

Jan. 1, 1986 - June 1, 1986
Member, Solid Waste Advisory Committee, Governor's Task Force on Hazardous Waste

Jan. 1, 1983 - June 30, 1985
Member, Contra Costa County Hazardous Waste Task Force

Sept. 1, 1982 - Feb. 1, 1983
Member, Scientific Panel to Address Public Health Concerns of Delta Water Supplies, California Department of Water Resources

Present Position

January 1983- present
Owner and principal with Risk Sciences Associates, a Marin County, California, environmental consulting company specializing in multi-media human health and ecological risk assessment, air pathway analyses, hazardous materials management-infrastructure security, environmental site assessments, review and evaluation of EIRs/EISs, preparation of public health and safety sections of EIRs/EISs, and litigation support for toxic substance exposure cases.

Previous Positions

Jan. 2, 1983 - June 12, 1984
Member, State of California Occupational Safety and Health Standards Board (Cal/OSHA), appointed by the Governor

Aug. 1, 1979 - Jan. 2, 1983
Assistant Deputy Chief for Health, California Occupational Safety and Health Administration

Feb. 1, 1979 - Aug. 1, 1979

Administrative Assistant to Chairperson of Finance Committee, Board of Supervisors, San Francisco

Jan. 1, 1976 - Feb. 1, 1979
Research Pharmacologist and Postdoctoral Fellow, Department of Pharmacology and Toxicology, School of Medicine, University of California, San Francisco

Jan. 1, 1975 - Dec. 31, 1975
Acting Assistant Professor, Department of Pharmaceutical Chemistry, University of California, San Francisco

Experience

General

Dr. Greenberg has been a consultant in Hazardous Materials Management and Security, Human and Ecological Risk Assessment, Occupational Health, Toxicology, Hazardous Waste Site Characterization, and Toxic Substances Control Policy for over 26 years. He has broad experience in the identification, evaluation and control of health and environmental hazards due to exposure to toxic substances. His experience includes Community Relations Support and Risk Communication through experience at high-profile sites and presentations at professional society meetings.

He has considerable experience in the review and evaluation of exposure via the air pathway - particularly to emissions from power plants, refineries, and diesel exhaust - and a thorough knowledge of the regulatory requirements through his experience at Cal/OSHA, the BAAQMD Hearing Board, as a consultant to the California Energy Commission, and in preparing such assessments for local government and industry. He has assessed exposures to diesel exhaust during construction and operations of stationary and mobile sources and has testified at evidentiary hearings numerous times on this subject.

He is presently assisting the California Energy Commission in assessing the risks to workers and the public of proposed power plants and LNG terminals in the state. His experience in hazard identification, exposure assessment, risk assessment, occupational safety and health, emergency response, and Critical Infrastructure Protection has made him a valuable part of the CEC team addressing this issue. He has reviewed and commented on the DEIS/DEIR for the proposed SES LNG Port of Long Beach terminal, focusing on security issues for the CEC and on safety matters for the City of Long Beach. He has presented technical information and analysis to the State of California Interagency LNG Working Group on thermal radiation public exposure criteria and safety/security at an east coast urban LNG terminal. (Both presentations are confidential owing to the nature of the material.) He has conducted numerous evaluations of the safety and hazards of natural gas pipelines for the CEC and has presented his findings and recommendations at public meetings and evidentiary hearings.

He served for over five years as the Vice-chair of the California State Water Resources Control Board Advisory Committee convened to address toxic substances in sediments in bays, rivers, and estuaries. He has been a member of the Squaw Valley Technical Review Committee since 1986 establishing chemical application management plans at golf courses to protect surface and

groundwater quality. He has also conducted numerous ecological risk assessments and characterizations, including those for marine and terrestrial habitats.

Dr. Greenberg has extensive experience in data collection and preparation of human and ecological risk assessments on numerous military bases and industrial sites with Cal/EPA DTSC and RWQCB oversight. He has also been retained to provide technical services to the Cal/EPA Department of Toxic Substances Control (preparation of human health risk assessments) and the Office of Environmental Health Hazard Assessment (review and evaluation of air toxics health risk assessments and preparation of profiles describing the acute and chronic toxicity of toxic air contaminants). He has also conducted several surveys of sites containing significant lead contamination from various sources including lead-based paint, evaluated potential occupational exposure to lead dust and fumes in industrial settings, prepared numerous human health risk assessments of lead exposure, and prepared safety and health plans for remedial investigation of lead contaminated soils. Dr. Greenberg is also a recognized expert on the requirements of California's Proposition 65 and has served as an expert on Prop. 65 litigation.

Sites with EPA, RWQCB and/or DTSC Oversight

Dr. Greenberg has specific experience in assessing human health and ecological risks at contaminated sites at the land/water interface, including petroleum contaminants, metals, mercury, and VOCs at several locations in California including Oxnard, Richmond, Avila Beach, Mare Island Naval Shipyard, San Diego, Hollister, San Francisco, Hayward, Richmond, the Port of San Francisco, and numerous other locations. He has used Cal/EPA methods, US EPA methods, and ASTM Risk Based Corrective Action (RBCA) and Cal/Tox methodologies. He is extremely knowledgeable about SWRCB and SF Bay RWQCB regulations on underground storage tank sites and with ecological issues presented by contaminated sediments including sediment analysis, toxicity testing, tissue analysis, and sediment quality objectives. Dr. Greenberg served on the State Water Resources Control Board Bay Protection and Toxic Cleanup Program Advisory Committee from 1994 until the end of the program in 1999.

Dr. Greenberg experience on many of these contaminated sites has been as a consultant to local governments, state agencies, and citizen groups. He assisted the City and County of San Francisco in developing local ordinance requiring soil testing (Article 20, Maher ordinance) and hazardous materials use reporting (Article 21, Walker ordinance). He served as the City of San Rafael's consultant to provide independent review and evaluation of the site characterization and remedial action plan prepared for a former coal gasification site. He was a consultant to a citizen group in northern California regarding exposure and risks due to accidental releases from a petroleum refinery and assisted in the assessment of risks due to crude petroleum contamination of a southern California beach. He has prepared a number of risk assessments addressing crude petroleum, diesel and gasoline contamination, including coordinating site investigations, environmental monitoring, and health risk assessment for the County of San Luis Obispo regarding Avila Beach subsurface petroleum contamination. That high-profile project lasted for over one year and Dr. Greenberg managed a team of experts with a budget of $750,000. Another high-profile project included the preparation of an extensive comprehensive human and ecological risk assessment for the Hawaii Office of Space Industry on rocket launch impacts and transportation/storage of rocket fuels at the southern end of the Big Island of Hawaii. Dr. Greenberg's risk assessments were part of the EIS for the project. Dr. Greenberg also worked on another high-profile project conducting Air Pathway Analysis of off-site and on-site impacts

from landfill gas constituents, including indoor and outdoor air measurements, air dispersion modeling, flux chamber investigations, and health risk assessment for the County of Santa Barbara. Dr. Greenberg has conducted RI/FS work, prepared health risk assessments, evaluated hazardous waste sites and hazardous materials use at numerous locations in California, Hawaii, Oregon, Minnesota, Michigan, and New York. He has considerable experience in the development of clean-up standards and the development of quantitative risk assessments for site RI/FS work at CERCLA sites, as well as site closures, involving toxic substances and petroleum hydrocarbon wastes. He is experienced in working with both Region IX EPA and the State of California DTSC in negotiating clean-up standards based on the application of both site-specific and non site-specific health and ecological based clean-up criteria. He has significant experience in the development of site chemicals of concern list, quantitative data quality levels, site remedial design, the site closure process, the design and execution of data quality programs and verification of data quality prior to its use in the decision making process on large NPL sites.

Examples

The Avila Beach Health Study Phase 1: Reconnaissance Sampling Findings, Conclusions, and Recommendations. (July 1997) Volume 1: Baseline Human Health Risk Assessment. (May 1998)
The Avila Beach Health Study Phase 1, Volume 2: Environmental Monitoring. (May 1998)

Health Risk Assessment and Air Pathway Analysis for the Ballard Canyon Landfill, Santa Barbara County, Ca. (March 1999)

Screening Human Health Risk Assessment, Calculation of Soil Clean-up Levels, and Aquatic Ecological Screening Evaluation, Galilee Harbor, Sausalito, Ca. (May 1998)

Health Risk Assessment Due to Diesel Train Engine Emissions, Oakland, Ca. (June 1999)

Health Risk Assessment for Residual Mercury at the Deer Creek Facility, 3475 Deer Creek Road, Palo Alto, California. (July 1997)

Phase 2 Human Health Risk Assessment, Teledyne Inc., San Diego, Ca. (February 1997)

Human Health Risk Assessment, Teledyne Ryan Aeronautical, McCormick Selph Ordnance. Hollister, California. (December 1996)

Initial Phase Human Health Risk Assessment, Teledyne Inc., San Diego, Ca. (October 1996)

Human Health Risk Assessment, Ecological Screening Evaluation, and Development of Proposed Remediation Goals for the Flair Custom Cleaners Site, Chico, California (January 1996)

Human Health Risk Assessment for the X-3 Extrudate Project at Criterion Catalyst, Pittsburg, Ca. (November 1994)

Screening Health Risk Assessment and Development of Proposed Soil Remediation Levels at Hercules Plant #3, Culver City, Ca. (July 1993)

Ecological Screening Evaluation for the Altamont Landfill, Alameda County, Ca. (June, 1993)

Focused Ecological Risk Characterization, Hawaiian Electric Company, Keahole Generating Station Expansion, Hawaii (June 1993)

Human Health Risk Assessment for the Proposed Palima Point Space Launch Complex, prepared for the Hawaii Office of Space Industry (April 1993)

Ecological Risk Assessment for the Proposed Palima Point Space Launch Complex, prepared for the Hawaii Office of Space Industry (March 1993)

Human Health Risk Assessment for Current and Proposed Expanded Class II and Class III Operations at the Altamont Sanitary Landfill, Alameda County, Ca.
(March, 1993)

Screening Health Risk Assessment for the Proposed Expansion of the West Marin Sanitary Landfill, Point Reyes Station, Ca.
(March, 1993)

Health Risk Assessment for the Proposed Expansion of the Forward, Inc. Landfill, Stockton, Ca.
(September 14, 1992)

Health Risk Assessment for the Rincon Point Park Project, San Francisco, Ca. Prepared for Baseline Environmental Consulting and the San Francisco Redevelopment Agency.
(August 10, 1992)

Health Risk Assessment for the South Beach Park Project, San Francisco, Ca. Prepared for Baseline Environmental Consulting and the San Francisco Redevelopment Agency.
(August 10, 1992)

Screening Health Risk Assessment and Development of Proposed Soil and Groundwater Remediation Levels, Kaiser Sand and Gravel, Mountain View, Ca. Prepared for Baseline Environmental Consulting (January 30, 1992)

Development of Proposed Soil Remediation Levels for the Marine Corps Air-Ground Combat Center, 29 Palms, California (May 30, 1991)

Preliminary Health Risk Assessment for the City of Pittsburg Redevelopment Agency, Pittsburg, California (May 29, 1991)

Military Bases

Dr. Greenberg has experience in conducting assessments at DOD facilities, including RI/FS work, preparation of health risk assessments, evaluation of hazardous waste sites and hazardous materials use at the following Navy sites in California: San Diego Naval Base; Marine Corps Air-Ground Combat Center, 29 Palms; Mare Island Naval Shipyard, Vallejo; Treasure Island Naval Station, San Francisco, Hunters Point Naval Shipyard, San Francisco, and the Marine

Corps Logistics Base, Barstow. He worked with the U.S. Navy and the U.S. EPA in the implementation of Data Quality Objectives (DQO's) at MCLB, Barstow.

Examples

Review and Evaluation of the Remedial Investigation Report and Human Health Risk Assessment for the U. S. Naval Station at Treasure Island, Ca. (June 1999)

Screening Health Risk Assessment for the Proposed San Francisco Police Department's Helicopter Landing Pad at Hunters Point Shipyard, San Francisco, Ca. (September 1997)

Development of Proposed Soil Remediation Levels for the Marine Corps Air-Ground Combat Center, 29 Palms, California (May 30, 1991)

Health Risk Assessment for the Chrome Plating Facility, Mare Island Naval Shipyard, Vallejo, California (October 24, 1988)

Background Levels and Health Risk Assessment of Trace Metals present at the Naval Petroleum Reserve No.1, 27R Waste Disposal Trench Area, Lost Hills, California (August 12, 1988)

RCRA Facility Investigation (RFI) Work Plan of Lead Oxide Contaminated Areas, Mare Island Naval Shipyard, Vallejo, California. Prepared in conjunction with Kaman Sciences Corp. (August 14, 1989)

Hazardous Waste and Solid Waste Audit and Management Plan, Mare Island Naval Shipyard, Vallejo, California. Prepared in conjunction with Kaman Sciences Corp. (July 3, 1989)

Water Quality Solid Waste Assessment Test (SWAT) Proposal RCRA Landfill, Mare Island Naval Shipyard, Vallejo, California. Prepared in conjunction with Kaman Sciences Corp. (October 31, 1988)

Waste Disposal Facilities, Waste Haulers, Waste Recycling Facilities Report, Mare Island Naval Shipyard, Vallejo, California. Prepared in conjunction with Kaman Sciences Corp. (September 22, 1988)

Sampling and Analysis Plan, Health and Safety Plan, Site Characterization of Lead Oxide Contaminated Areas, Mare Island Naval Shipyard, Vallejo, California. Prepared in conjunction with Kaman Sciences Corp. (September 2, 1988)

Air Quality Solid Waste Assessment Test (SWAT) Proposal, Mare Island Naval Shipyard, Vallejo, California. Prepared in conjunction with Kaman Sciences Corp. (August 25, 1988)

Liquefied Natural Gas (LNG)

Dr. Greenberg assisted the CEC in the preparation of the "background" report on the risks and hazards of siting LNG terminals in California ("LNG in California: History, Risks, and Siting" July 2003) and consulted for the City of Vallejo on a proposed LNG terminal and storage facility at the former Mare Island Naval Shipyard. He has also conducted an evaluation and prepared comments on the risks, hazards, and safety analysis of the DEIS/DEIR for the City of Long

Beach on a proposed LNG terminal at the Port of Long Beach (POLB) and conducted an analysis on vulnerability and critical infrastructure security for the CEC on this same proposed LNG terminal. He currently advises the CEC on the POLB LNG proposal on risks, hazards, human thresholds of thermal exposure, vulnerability, security, and represented the CEC at a U.S. Coast Guard briefing on the Waterway Suitability Assessment that included the sharing of SSI (Sensitive Security Information). He has presented technical information and analysis to the State of California LNG Interagency Working Group on thermal radiation public exposure criteria and safety/security at an east coast urban LNG terminal. (Both presentations are confidential owing to the nature of the material.) He has conducted numerous evaluations of the safety and hazards of natural gas pipelines for the CEC and has presented his findings and recommendations at public meetings and evidentiary hearings.

Infrastructure Security

Since 2002, Dr. Greenberg has been trained by and is working with the Israeli company SB Security, LTD, the most experienced and tested security planning and service company in the world. Since the events of 9/11, Dr. Greenberg has been the lead person for developing vulnerability assessments and power plant security programs for the California Energy Commission (CEC). In taking the lead for this state agency, Dr. Greenberg has interfaced with the California Terrorism Information Center (CATIC) and provided analysis, recommendations, and testimony at CEC evidentiary hearings regarding the security of power plants within the state. These analyses include the assessment of Critical Infrastructure Protection, threat assessments, criticality assessments, and the preparation of vulnerability assessments and off-site consequence analyses addressing the use, storage, and transportation of hazardous materials, recommendations for security to reduce the threat from foreign and domestic terrorist activities, perimeter security, site access by personnel and vendors, personnel background checks, management responsibilities for facility security, and employee training in security methods. Dr. Greenberg is the lead person in developing a model power plant security plan, vulnerability assessment matrix, and a security training manual for the CEC. The model security plan is used by power plants in California as guidance in developing and implementing security measures to reduce the vulnerability of California's energy infrastructure to terrorist attack. He has testified at several evidentiary hearings for the CEC on power plant security issues. He also leads an audit team conducting safety and security audits at power plants throughout California that are under the jurisdiction of the CEC. In addition to providing security expertise to the State of California, in August 2004, a team of experts led by Dr. Greenberg was awarded an 18-month contract by the State of Hawaii to update and improve the state's Energy Emergency Preparedness Plan and make recommendations for increased security of critical energy infrastructure on this isolated group of islands.

Air Pathway Analysis

Dr. Greenberg has prepared numerous Air Pathway Analyses and human health risk assessments, evaluating exposure at numerous locations in California, Hawai'i, Oregon, Minnesota, Michigan, and New York. He is experienced in working with Region IX EPA, the State of California DTSC, and the Hawai'i Department of Health Clean Air Branch in the application of both site-specific and non site-specific health risk assessment criteria.

Examples

Human Health Risk Assessment for the Open Burn/Open Detonation Operation at McCormick Selph, Inc., Hollister, Ca. (June 2003)

Air Quality and Human Health Risk Assessment for the Royal Oaks Industrial Complex, Monrovia, Ca. (January 2003)

Human Health Risk Assessment and Indoor Vapor Intrusion Assessment for the former Pt. St. George Fisheries Site, Santa Rosa, Ca. (October 2002)

Human Health Risk Assessment for the former Sargent Industries Site, Huntington Park, Ca. (July 2001)

Health Risk Assessment Due to Diesel Train Engine Emissions, Oakland, Ca. (June 1999)

The Avila Beach Health Study Phase 1: Reconnaissance Sampling Findings, Conclusions, and Recommendations. (July 1997) Volume 1: Baseline Human Health Risk Assessment. (May 1998)

The Avila Beach Health Study Phase 1, Volume 2: Environmental Monitoring. (May 1998)

Health Risk Assessment and Air Pathway Analysis for the Ballard Canyon Landfill, Santa Barbara County, Ca. (March 1999)

Human Health Risk Assessment, Teledyne Ryan Aeronautical, McCormick Selph Ordnance. Hollister, California. (December 1996)

Initial Phase Human Health Risk Assessment, Teledyne Inc., San Diego, Ca. (October 1996)

Human Health Risk Assessment for Current and Proposed Expanded Class II and Class III Operations at the Altamont Sanitary Landfill, Alameda County, Ca.
(March, 1993)

Focused Ecological Risk Characterization, Hawaiian Electric Company, Keahole Generating Station Expansion, Hawai'i (June 1993)

Human Health Risk Assessment for the Proposed Palima Point Space Launch Complex, prepared for the Hawai'i Office of Space Industry (April 1993)

Ecological Risk Assessment for the Proposed Palima Point Space Launch Complex, prepared for the Hawai'i Office of Space Industry (March 1993)

Human Health Risk Assessment Due to Emissions from a Medical Waste Incinerator, prepared for Kauai Veterans Memorial Hospital, Kauai, Hawai'i (1994)

Cancer Risk Assessment for the H-Power Generating Station, Campbell Industrial Park, Oahu, Hawai'i (1988)

Hazardous Materials Assessments, Waste Management Assessments, Worker Safety and Fire Protection Assessments, and Public Health Impacts Assessments

Dr. Greenberg also has significant experience as a consultant and expert witness for the California Energy Commission providing analysis, recommendations, and testimony in the areas of hazardous materials management, process safety management, waste management, worker safety and fire protection, and public health impacts for proposed power plant/cogeneration facilities. These analyses include the evaluation and/or preparation of the following:

- Off-site consequence analyses of the handling, use, storage, and transportation of hazardous materials,
- Risk Management Plans (required by the Cal-ARP) and Business Plans (required by H&S Code section 25503.5),
- Safety Management Plans (required by 8 CCR section 5189),
- Natural gas pipeline safety,
- Solid and hazardous waste management plans,
- Phase I and II Environmental Site Assessments,
- Construction and Operations Worker Safety and Health Programs,
- Fire Prevention Programs,
- Human health risk assessment from stack emissions and from diesel engines, and
- Mitigation measures to address PM exposure, including diesel particulates

Examples

- Almond 2 Power Plant Project, City of Ceres, Ca. 2009 – present. Public health.
- Watson Cogeneration Steam and Electric Reliability Project, Carson, Ca. 2009 – present. Public health.
- Hanford Combined-Cycle Power Plant (amendment), Kings County, Ca. 2008 – present. Public health.
- Henrietta Combined-Cycle Power Plant (amendment), Kings County, Ca. 2008 – present. Public health.
- Lodi Energy Center, Lodi, Cal. 2008 – present. Hazardous materials management, worker safety/fire protection.
- Marsh Landing Generating Station, City of Antioch, Ca. 2008 – present. Hazardous materials management, worker safety/fire protection.
- Palmdale Hybrid Power Plant, Palmdale, Ca. 2008 – present. Hazardous materials management, worker safety/fire protection, public health.
- Stirling Energy Systems Solar 1 Project, San Bernardino County, Ca. 2008 – present. Public health.
- Stirling Energy Systems Solar 2 Project, Imperial County, Ca. 2008 – present. Public health.
- San Joaquin Solar 1&2, Fresno County, Ca. 2008 – present. Hazardous materials management, worker safety/fire protection, public health.
- GWF Tracy Combined Cycle Power Plant, Tracy, Ca. 2008 – present. Hazardous materials management, worker safety/fire protection, public health.
- CPV Vaca Station Power Plant, Vacaville, Ca. 2008 – present. Hazardous materials management, worker safety/fire protection.

- Willow Pass Generating Station, Pittsburg, Ca. 2008 – present. Hazardous materials management, worker safety/fire protection, waste management.
- Avenal Energy Power Plant, Avenal, Ca. 2008 – 2009. Worker safety/fire protection, public health.
- Orange Grove Energy, San Diego County, Ca. 2008-2009. Public health.
- Riverside Energy Resource Center Units 3&4, Riverside, Ca. 2008 – 2009. Hazardous materials management.
- Canyon Power Plant, Anaheim, Ca. 2007 – present. Hazardous materials management, worker safety/fire protection, public health.
- Carlsbad Energy Center, Carlsbad, Ca. 2007 – present. Hazardous materials management, worker safety/fire protection, public health.
- Ivanpath Solar Electric Generating System, San Bernardino County, Ca. 2007 – present. Public health.
- Kings River Conservation District Community Power Project, City of Parlier, Ca. 2007 – 2009. Hazardous materials management, worker safety/fire protection.
- Chula Vista Energy Upgrade Project, Chula Vista, Ca. 2007 – 2009. Hazardous materials management, worker safety/fire protection.
- Chevron Richmond Power Plant Replacement Project, Richmond, Ca. 2007 – 2008. Hazardous materials management, public health.
- Humboldt Bay Generating Station, Eureka, Ca. 2006 – 2008. Hazardous materials management, worker safety/fire protection, waste management.
- El Centro Power Plant – Unit 3 Repower Project, El Centro, Ca. 2006 – 2007. Public health.
- San Francisco Energy Reliability Project, San Francisco, Ca. 2004 – 2006. Hazardous materials management, worker safety/fire protection, waste management, public health
- Inland Empire Energy Center, Romoland, Ca. 2002-3. hazardous materials, worker safety/fire protection, waste management, public health
- Malburg Generating Station Project, City of Vernon, Ca. 2002-3. hazardous materials, worker safety/fire protection, waste management, public health
- Blythe II, Blythe, Ca. 2002-3. hazardous materials, worker safety/fire protection,
- Palomar Energy Center, Escondido, Ca. 2002-3. hazardous materials, worker safety/fire protection, waste management, public health
- Cosumnes Power Project, Rancho Seco, Ca. 2002-3. hazardous materials, worker safety/fire protection, waste management, public health
- Tesla Power Project, Tesla, Ca. 2002-3. hazardous materials, worker safety/fire protection, waste management, public health
- San Joaquin Valley Energy Center, San Joaquin, Ca. 2002-3. hazardous materials, worker safety/fire protection, waste management
- Morro Bay Power Plant, Morro Bay, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management
- Potrero Power Plant Unit 7, San Francisco, Ca., 2001-2: hazardous materials, worker safety/fire protection
- El Segundo Power Redevelopment Project, El Segundo, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management
- Rio Linda Power Project, Rio Linda, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health

- Pastoria II Energy Facility Expansion, Grapevine, Ca., 2001: hazardous materials, worker safety/fire protection
- East Altamont Energy Center, Byron, Ca., 2001-2: hazardous materials, worker safety/fire protection
- Magnolia Power Project, Burbank, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Russell City Energy Center, Hayward, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management
- Woodbridge Power Plant, Modesto, Ca., 2001: hazardous materials, worker safety/fire protection, waste management
- Colusa Power Plant Project, Colusa County, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Valero Refinery Cogeneration Project, Benicia, Ca., 2001: hazardous materials, worker safety/fire protection
- Ocotillo Energy Project, Palm Springs, Ca., 2001: hazardous materials, worker safety/fire protection
- Gilroy Energy Center Phase II Project, Gilroy, Ca., 2001-2: hazardous materials, worker safety/fire protection
- Los Esteros Critical Energy Facility, San Jose, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Roseville Energy Facility, Roseville, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Spartan Power, San Jose, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Inland Empire Energy Center, Romoland, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- South Star Cogeneration Project, Taft, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Tesla Power Plant, Eastern Alameda County, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Tracy Peaker Project, Tracy, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Henrietta Peaker Project, Kings County, Ca., 2001: hazardous materials, worker safety/fire protection, waste management, public health
- Central Valley Energy Center, San Joaquin, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Cosumnes Power Plant, Rancho Seco, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Los Banos Voltage Support Facility, Western Merced County, Ca., 2001-2: waste management, public health
- Palomar Energy Project, Escondido, Ca., 2001-2: hazardous materials, worker safety/fire protection, waste management, public health
- Metcalf Energy Center, San Jose, Ca., 2000-1: hazardous materials
- Blythe Power Plant, Blythe, Ca., 2000-1: hazardous materials
- San Francisco Energy Co. Cogeneration Project, San Francisco, Ca., 1994-5: hazardous materials

- Campbell Soup Cogeneration Project, Sacramento, Ca., 1994: hazardous materials
- Proctor and Gamble Cogeneration Project, Sacramento, Ca., 1993-4: hazardous materials
- San Diego Gas and Electric South Bay Project, Chula Vista, Ca., 1993: hazardous materials
- SEPCO Project, Rio Linda, Ca., 1993: hazardous materials
- Shell Martinez Manufacturing Complex Cogeneration Project, Martinez, Ca., 1993: hazardous materials and review and evaluation of EIR

Occupational Safety and Health/Health and Safety Plans/Indoor Air Quality

Dr. Greenberg has significant experience in occupational safety and health, having directed the development, adoption, and implementation of over 50 different Cal/OSHA regulations, including airborne contaminants (>450 substances), lead, asbestos, confined spaces, and worker-right-to-know (MSDSs). He has conducted numerous occupational health surveys and has extensive experience in the sampling and analysis of indoor air quality at residences, workplaces, and school classrooms. He is currently the team leader conducting safety and security audits at power plants throughout California for the California Energy Commission. Safety issues audited include compliance with regulations addressing several safety matters, including but not limited to, confined spaces, lockout/tagout, hazardous materials, and fire prevention/suppression equipment.

Examples

Review and Evaluation of Public and Worker Safety Issues at the proposed SES LNG Facility, Port of Long Beach. prepared for the City of Long Beach. (November 2005)

Confidential safety and security audit reports for 18 power plants in California. prepared for the California Energy Commission. (January 2005 through March 2006)

Report on the Accidental release and Worker Exposure to Anhydrous Ammonia at the BEP I Power Plant, Blythe, Ca. prepared for the California Energy Commission. (October 2004)

Investigation of a Worker Death in a Confined Space, La Paloma Power plant. prepared for the California Energy Commission. (July 2004)

Preliminary Report on Indoor Air Quality in Elementary School Portable Classrooms, Marin County, Ca. (December 1999)

Health Risk Assessment Due to Diesel Train Engine Emissions, Oakland, Ca. (June 1999)

Air Pathway Analysis for the Ballard Canyon Landfill. Submitted to the County of Santa Barbara, (March 1999)

Review and Evaluation of the Health Risk Assessment for Outdoor and Indoor Exposures at the Former Golden Eagle Refinery Site, Carson, Ca. (May 1998)

The Avila Beach Health Study Phase 1: Reconnaissance Sampling Findings, Conclusions, and Recommendations. (July 1997) Volume 1: Baseline Human Health Risk Assessment. (May 1998)

The Avila Beach Health Study Phase 1, Volume 2: Environmental Monitoring. (May 1998)

Phase 2 Human Health Risk Assessment, Teledyne Inc., San Diego, Ca. (February 1997)

Determination of Occupational Lead Exposure at a Tire Shop in Placerville, Ca. (April 1993)

Development of an Environmental Code of Regulations for Hazardous Waste Treatment Facilities on La Posta Indian Tribal lands, San Diego County, Ca. (August 1992)

Sampling and Analysis Plan, Health and Safety Plan, Site Characterization of Lead Oxide Contaminated Areas, Mare Island Naval Shipyard, Vallejo, California. Prepared in conjunction with Kaman Sciences Corp. (September 2, 1988)

Mercury Contamination

Dr. Greenberg has prepared and/or reviewed several human health and ecological risk assessments regarding mercury contamination in soils, sediments, and indoor surfaces. Dr. Greenberg served on the State Water Resources Control Board Bay Protection and Toxic Cleanup Program Advisory Committee from 1994 until the end of the program in 1999.

Examples

Review and evaluation of a human health risk assessment of ingestion of sport fish caught from San Diego Bay and which contain tissue levels of mercury and PCBs (November 2004 – present)

Screening Human Health Risk Assessment, Calculation of Soil Clean-up Levels, and Aquatic Ecological Screening Evaluation, Galilee Harbor, Sausalito, Ca. (May 1998)

Health Risk Assessment for Residual Mercury at the Deer Creek Facility, 3475 Deer Creek Road, Palo Alto, California. (July 1997)

Human Health Risk Assessment Due to Emissions from a Medical Waste Incinerator, prepared for Kauai Veterans Memorial Hospital, Kauai, Hawai'i (1994)

DECLARATION OF
CASEY WEAVER

I, **CASEY WEAVER** declare as follows:

1. I am presently employed by the **CALIFORNIA ENERGY COMMISSION** in the Soil and Water and Resources Unit of the Siting, Transmission and Environmental Protection Division as an **ENGINEERING GEOLOGIST**.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on **SOIL AND WATER SECTION**, for the **CALICO SOLAR ENERGY PROJECT** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

   I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 8, 2010 Signed: _____

At: Sacramento, California

CASEY W. WEAVER, PG, CEG

SUMMARY OF EXPERIENCE:

Certified Engineering Geologist with over 20 years of environmental and geotechnical consulting experience. Experience includes remedial investigations and feasibility studies (RI/FS), groundwater investigations, corrective action plans, landfill studies (SWATs, siting, closure), preliminary environmental site assessments (PESA, Phase I), regulatory compliance (RCRA/CERCLA), geotechnical investigation/evaluation, geologic hazard evaluations, active fault evaluations, seismic studies, landslide evaluation/repair, foundation suitability studies, personnel management and business development.

EDUCATION:

B.S. Geology, Humboldt State University, Arcata, CA, 1981
University of California, Davis Extension Courses

REGISTRATIONS/LICENCES/CERTIFICATIONS:

Certified Engineering Geologist, California
Registered Geologist, California, Oregon, Arizona
Registered Environmental Assessor
OSHA 1910.120 Hazardous Waste Operations and Emergency Response - 40hr
OSHA 1910.120 Hazardous Waste Operations and Emergency Response -Supervising Operations at Hazardous Waste Sites.

PROFESSIONAL HISTORY:

2008 to Present **Engineering Geologist**
California Energy Commission, Sacramento, CA

Duties within the Water and Soils Unit of the Engineering Office in the Facilities Siting Division include review and evaluation of applications for certification of thermal power plants within the state of California. The focus of the work is on sensitive project sites that may have issues involving groundwater and surface water resources, soil erosion, flooding potential, water quality and plant-derived waste generation and disposal. In addition, evaluate construction, operation and maintenance of the facilities and conduct investigations to determine if violations of the program's regulations, the Energy Commission's conditions of certification, or the California Environmental Quality Act (CEQA) have occurred.

2001 to 2008 **Engineering Geologist**
State Water Resources Control Board, Headquarters, Sacramento, CA

With the UST Enforcement Unit, under direction from the State Attorney General's Office, conducted inspections of UST systems to evaluate compliance with 1998 upgrade requirements. This work culminated in the largest settlement of its kind in the nation's history. In addition, conducted surveillance of unlawful discharges from remediation systems and conducted investigations of UST Fund fraud cases.

With the USTCF Technical Review Unit, evaluated the technical elements of USTCF claims.

With the Division of Financial Assistance, assisted with the development of program policy for the Agricultural Water Quality Grant Program ($46 million) and the Integrated Water Quality Grant Program ($380 million), participated in stakeholder workshops, contributed to multijurisdictional work groups for program development and implementation.

With the Office of Enforcement, conducted investigations of operator misconduct, wrote enforcement investigation reports and prepared disciplinary letters.

1998 to 2001

Senior Engineering Geologist
BSK & Associates, Rancho Cordova, CA

Designed and directed hydrogeologic investigations for use with environmental remediation projects. Supervised field personnel installing groundwater monitoring wells, conducting aquifer tests & SVE pilot tests, reviewed reports and workplans, and conducted business development.

Conducted review of Alquist-Priolo active fault hazard reports as county geologist for Kern County.

1993 to 1998

Senior Geologist, Geoscience Team Leader and RI/FS Task Leader
LAW Engineering and Environmental Services, Inc., Sacramento, CA

As Geoscience Team Leader, responsible for career development, training and personnel management of ten employees. This group consisted of 3 senior-level geologists, 4 project level geologists and scientists, 2 junior level geologists and 1 technician.

As RI/FS Task Leader, responsible for the development of cost estimates/budgets, preparation of Work Plans and Sampling and Analysis Plans, management of field activities, data collection and documentation associated with the investigation of 15 Installation Restoration Program sites at Beale Air Force Base awarded under several Delivery Orders with combined project budgets of $18 million. Also responsible for aerial photographic interpretations associated with a basewide (23,000 acres),

Preliminary Assessment, and preparation of a basewide Hydrogeologic Evaluation Report.

1990 to 1993

Senior Project Manger/General Manager
Earthtec, Ltd., Roseville, CA

Management of Environmental Department, business development, preparation of cost estimates and proposals, client and regulatory agency interface, supervision and training, report writing, technical review, budget management, and quality control. Initiated and supported the development of company's wetland and wildlife departments. Typical projects included preliminary sire assessments, soil vapor studies, detailed hydrogeologic evaluations, waste plume delineations, and development of remediation alternatives associated with landfills, service stations, bulk oil facilities and other potentially contaminated sites.

1981 to 1990

Project Geologist
SHN Group, Inc. Eureka, CA

Managed project work directed toward solving environmental issues at variably contaminated sites and provided geotechnical information for land development and construction. Responsibilities included development of cost estimates/budgets, planned and supervised field operations, collected and interpreted subsurface information, evaluated areas traversed by Alquist-Priolo Special Studies Zones and sites subject to slope stability hazards. Typical projects included geotechnical evaluations and geologic hazard studies for major subdivisions, hospitals, schools, lumber companies, run-of-the-river hydroelectric projects, underground storage tank sites, and solid waste landfills.

1979 to 1981

Geologist/Seismologic Technician
Woodward-Clyde Consultants, San Francisco, CA

Designed and operated a laboratory model to study surface effects of thrust faulting in connection with seismic evaluation studies for the PG&E Humboldt Bay nuclear reactor. In addition, installed and operated field seismographs in the Humboldt Bay region.

DECLARATION OF
Testimony of John L. Fio

I**, John L. Fio,** declare as follows:

1. I am presently Consultant to the California Energy Commission, Siting, Division, as a **Hydrogeologic Consultant** .through Aspen Environmental Group

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on **Soil and Water Resources** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 22, 2010 Signed: Original Signed by J. Fio

At: Davis, California

JOHN L. FIO

QUALIFICATIONS

John L. Fio has over 25 years of problem-solving experience. Mr. Fio analyzes groundwater systems, quantifies chemical transport in the subsurface, and evaluates groundwater surface-water interactions. He is a recognized expert on hydrologic and water quality issues in the San Francisco Bay Area and the San Joaquin Valley, California.

John Fio:

- Develops and employs numerical models for site, water district, and basin-wide investigations.
- Calculates extraction effects on groundwater levels, stream flow, and lake levels.
- Establishes water quality monitoring programs.
- Designs water management plans.
- Evaluates groundwater quality effects of wastewater and recycled water disposal to land.
- Develops and implements Geographic Information System (GIS) databases.
- Determines water sources using chemical and age-dating techniques.

PROFESSIONAL EXPERIENCE

January, 1998 – present

Principal Hydrologist, HydroFocus, Inc. *Davis, CA*

- Technical Groundwater Expert, Bureau of Water and Power, City of Beijing, China. Providing review, oversight, and direction for data collection, data interpretation, and groundwater-flow and constituent transport modeling of recycled water groundwater storage project.
- Water supply master plan, California Water Service Company, South San Francisco, California. Assessed water supply and quality benefits of alternative water supply projects in the Westside Groundwater Basin.
- Data and modeling analysis of regional drainage conditions – San Joaquin Valley, California.
- Groundwater-flow, solute-transport, and water-quality impacts from wastewater disposal to land: sanitary districts and municipalities located in San Joaquin and Contra Costa Counties, California.
- Groundwater quality, sea water intrusion and groundwater flow in San Francisco and San Mateo Counties, California. Field data collection, groundwater-flow and geochemical modeling to define seawater intrusion and quantify processes affecting groundwater quality.
- Groundwater extraction to control and remediate solvent plume – San Mateo County. Use of groundwater-flow model and field data collection and analysis to quantify contaminant movement and remediation.

- Quantitative hydrogeochemical assessment of contaminant transport near Menlo Park, California. Development of groundwater-flow and solute-transport models to quantify hydrocarbon transport beneath industrial facility near San Francisco Bay.
- Groundwater recharge and subsurface storage, Merced County, California. Developed and implemented regional groundwater-flow model to assess groundwater recharge and pumping projects.
- Depletion of subsurface flow to the North Platte River, Wyoming and Nebraska. Data analysis and modeling of stream aquifer interactions in support of interstate water rights conflict.
- Hydrologic and geochemical impacts of groundwater pumping and surface water injection– Sacramento County.

1995 to 1997

Senior Project Hydrologist, Hydrologic Consultants, Inc. *Sacramento, CA*

Project experience in the evaluation of groundwater flow, water quality, and solute transport. Consulting assignments included the following:

- Developed relationships to describe geologic controls and load-flow relationships for Santa Ynez River drainage system. The Santa Ynez River is a significant source of water recharging the Lompoc Groundwater Basin, and the relationships were part of a network of interacting reservoir operations, surface-water, and groundwater-flow and transport models.
- Evaluation of groundwater-flow paths beneath South San Francisco Bay. The groundwater-flow system was quantified using a groundwater-flow model to assess system response to pumping centers located east and west of the Bay.
- Coordination with the California Regional Water Quality Control Board on the remediation of a VOC plume in Mountain View, California.
- Assess the response of groundwater levels, streamflow, and spring discharge to groundwater pumpage in the Mammoth Basin, California.
- Quantifying stream flow depletions owing to increased consumption and groundwater pumping.

1990 to 1995

Research Grade Hydraulic Engineer, U.S. Geological Survey Sacramento, CA

- Conducted regional and geohydrologic and groundwater quality investigations in the western San Joaquin Valley, California.
- Directed the development of a regional Geographic Information System database for the South San Francisco and Peninsula Area, California.
- Supervised data collection and development of databases, data analyses, and report writing.
- Constructed groundwater flow models for parts of the western San Joaquin Valley and South San Francisco Bay areas, California.
- Interacted with private and public cooperators and funding agencies.

AWARDS AND HONORS

U.S. Geological Survey Performance Award: 1989, 1990, 1992, 1993, and 1994
Citation for Outstanding Performance, University of California, Davis (1981)
Edward Kraft Scholarship Prize, University of California, Davis (1981)

RELEVANT PUBLICATIONS

Hydrogeology of the San Francisco Bay Area

Metzger, L.F. and ***Fio, John L.***, 1997, Ground-water development and the effects on ground-water levels and water quality in the Town of Atherton, San Mateo County, California, U.S. Geological Survey Water-Resources Investigations Report 97-4033, 31p.

Fio, John L., and Leighton, D.A., 1995, Geohydrologic framework, Historical Development of the ground-water system, and general hydrologic and water-quality conditions in 1990, south San Francisco Bay and Peninsula area, California: U.S. Geologic Survey Open-File Report 94-357, 46 p.

Leighton, D.A., ***Fio, John L.***, and Metzger, L.F., 1995, Database of well and areal data, South San Francisco Bay and Peninsula area, California: U.S. Geological Survey Water-Resources Investigation Report 94-4151, 47 p.

Geochemistry and Salt Migration

Fio, John L., Fujii, R. and Deverel, S.J., 1991, Selenium mobility and distribution in irrigated and nonirrigated alluvial soils: Soil Science Society of America Journal, v. 55, p. 1313-1320.

Deverel, S.J., and ***Fio, John L.***, 1991, Ground-water Flow and solute movement to drain laterals, western San Joaquin Valley, California. 1: Geochemical Assessment, Water Resources Research, v. 27, no. 9, 2233-2246 p.

Fio, John L., and Fujii, R., 1990, Selenium speciation methods and application to soil saturation extracts from San Joaquin Valley, California: Soil Science Society of America Journal, v. 54, p. 363-369.

Fujii, R, and ***Fio, John L.***, 1988, Partitioning and speciation of soluble and adsorbed selenium in soils: Agronomy Abstracts, Amer. Soc. Agron. Annual meetings, Anaheim, California, p. 196-97.

Numerical Modeling – Groundwater flow and contaminant transport

Fio, John L., 1997, Geohydrologic effects on drainwater quality: Journal of Irrigation and Drainage Engineering, ASCE 123(3).

Fio, John L., and Leighton, D.A., 1994, Effects of ground-water chemistry and flow on quality of drainflow in the western San Joaquin Valley, California: U.S. Geological Survey Open-File Report 94-72, 28 p.

Fio, John L., 1994 Calculation of a water budget and delineation of contributing sources to drain flows in the western San Joaquin Valley, California: U.S. Geological Survey Open-File Report 94-45, 28 p.

Barlow, Paul M., Wagner, B.J., Belitz, K., and ***Fio, John L.***, 1993, Effects of Management alternatives on the shallow, saline ground water in the western San Joaquin Valley, California, Water Fact Sheet, Open-File Report 93-665.

Fio, John L., and Deverel, S.J., 1991, Ground-water flow and solute movement to drain laterals, western San Joaquin Valley, California. 2: Quantitative hydrologic assessment. Water Resources Research, v. 27, no. 9, 2247-2257 p.

Fio, John L., and Deverel, S.J., 1990, Interaction of shallow ground water and subsurface drains: implications for selenium transport and distribution in the western San Joaquin Valley, California. Abstract for technical session on ground-water flow systems and land use: relation to quality of shallow ground water, Association of Ground Water Scientists and Engineers, Anaheim, California, in Journal of Ground Water, v. 28, no. 5, p. 788-789.

Fio, John L., and Deverel, S.J., 1989, Ground-water flow to subsurface drains in the western San Joaquin Valley, California: U.S. Geological Survey Second National Symposium on Water Quality, Orlando, Florida, November 12-17, 1989, abstracts and technical sessions, U.S. Geological Survey Open-File Report 89-409, p. 25.

Fio, John L., and Deverel, S.J., 1988, Ground-water flow to subsurface agricultural drains in the western San Joaquin Valley, California: Transactions of the American Geophysical Union, v. 69, no. 44.

Monitoring

Leighton, D.A. and ***Fio, John L.***, 1995, Evaluation of a monitoring program for assessing the effects of management practices on the quantity and quality of drainwater from the Panoche Water District, Western San Joaquin Valley, California, U.S. Geological Survey Open-File Report 95-731, 25 p.

Puckett, L.K., Alemi, M.M., Fan, A.M., ***Fio, John L.***, Hansen, D., Wallender, and W., Wernette, F., 1992, Long-term monitoring plan, San Joaquin Valley Drainage Implementation Program.

1987 to 1990

Civil Engineer, U.S. Geological Survey *Sacramento, CA*

- Conducted field-scale investigations of on-farm drainage systems.
- Developed groundwater-flow model of tile drainage system. Assessed flow paths and salt transport in shallow flow-system. Quantified regional groundwater-flow paths intercepted by on-farm drainage systems.
- Integrated particle-tracking models with groundwater-flow model results to assess advective transport of salts and selenium.

1985 to 1987

Hydrologist, U.S. Geological Survey *Sacramento, CA*

- Designed and conducted sorption experiments and incorporated results into a solute transport model.
- Assessed the distribution of salts and selenium in unsaturated and saturated soil profiles.
- Developed analytical method to estimate organic selenium concentrations in soil extracts.

1983 to 1984

Research Assistant, University of California *Davis, CA*

- Conducted an assessment of methods used to analyze for selenium in soil extracts, aqueous samples, and animal tissues.
- Implemented experiments to assess arsenic volatilization from soils.
- Conducted laboratory analyses to estimate the buffering capacity of soils in response to acidic deposition.

ACADEMIC BACKGROUND

Master of Science, 1987, Civil Engineering, University of California at Davis
Bachelor of Science, 1984, Soil and Water Science, University of California at Davis

PROFESSIONAL AFFILIATIONS

American Society of Civil Engineers
Association of Groundwater Scientists and Engineers
California Groundwater Resources Association

DECLARATION OF
Eugene B. (Gus) Yates

I**, Gus Yates,** declare as follows:

1. I am presently a consultant to the California Energy Commission for the Siting, Division, as a **Hydrogeologic Consultant** through Aspen Environmental Group.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I assisted the staff testimony on **Soil and Water Resources** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 22, 2010 Signed: Original Signed by E. Yates

At: Davis, California

EUGENE B. (GUS) YATES

QUALIFICATIONS

Gus Yates has been a professional hydrologist in California for over 25 years. His role in water resources management projects commonly bridges the technical and policy realms. He specializes in rapidly identifying the key water-related issues for a project and addressing them with appropriate quantitative tools that make the best use of available data. He ties his technical work back into management plans and regulatory compliance documents. He has extensive experience in analysis and management of groundwater basins and related surface water and habitat systems throughout central and northern California. Mr. Yates is registered with the State of California as a professional geologist and certified hydrogeologist.

PROFESSIONAL EXPERIENCE

April, 2009 – present

Senior Hydrologist, HydroFocus Inc. *Davis, CA*

Evaluates groundwater conditions at local and basinwide scales using modeling and statistical techniques; leads stakeholder processes to develop groundwater and watershed management plans that are grounded in technical understanding of the hydrologic system; applies operations models to optimize project design and quantify environmental impacts; applies training and experience in CEQA, NEPA, water-quality regulations, water rights, group facilitation, and litigation.

January, 1999 - March, 2009

Consulting Hydrologist in Private Practice *Berkeley, CA*

- Groundwater flow and transport model, San Benito County, CA – Developed a regional groundwater flow and salinity model with MODFLOW and MT3DMS.
- Groundwater flow model, Laguna Seca subarea, Monterey County, CA – Developed and jointly calibrated a soil-moisture-recharge model and groundwater flow model to evaluate safe yield in a small, structurally complex coastal basin.
- Southeast Chico drainage study – Applied MODFLOW and HEC-RAS models to determine the cause of periodic shallow flooding in a new suburb.
- Groundwater flow model, Yuba goldfields wet-pit gravel quarry, Yuba County, CA – Developed a local-scale MODFLOW model to estimate the impacts of a proposed gravel quarry that would penetrate a regional confining layer.
- Seaside Basin update on groundwater conditions, Seaside, CA – Updated and improved prior estimates of pumping, recharge, aquifer characteristics and yield to help resolve a water-rights dispute.
- Cambria Community Services District water-supply master plan – Quantified the frequency and duration of drought-related water shortages and evaluated feasibility of water supply alternatives.
- Fish habitat improvements, Yolo Bypass, CA -- Applied HEC-RAS stream hydraulics model with input from landowners and biologist to design creek modifications that would improve anadromous fish passage and create localized inundation for splittail spawning and rearing.

- Integrated water resources management plan, Yolo County, CA -- Provided technical expertise and local knowledge as coauthor of a countywide water management with state and local agencies.
- Groundwater management plan, Soquel Creek Water District, Santa Cruz County, CA -- Served as technical advisor and coauthor for GMP update to meet SB1938 requirements and focus monitoring and management actions on emerging key issues.

1991-1999

Environmental Scientist, Jones & Stokes Associates *Sacramento, CA*

- Willow Slough watershed management plan, Yolo County, CA – Facilitated stakeholder process; documented groundwater, flooding and habitat conditions; and developed BMPs for agriculture.
- Groundwater management plan, northern San Benito County, CA – Served as facilitator, technical advisor and author for a multi-party planning process to identify issues and realistic solutions in a heavily-used groundwater basin.
- Subsidence impacts of groundwater pumping, Mendota, CA – Developed regression equations based on extensive USGS data to predict subsidence from groundwater transfers.
- Nitrate contamination from septic systems, Los Osos, CA – Served as expert advisor for field investigation of nitrate contamination from septic systems in a sandy coastal aquifer.
- Operations model for conjunctive use of desal plant and groundwater, Cambria, CA – Developed a probabilistic, real-time operations model to guide the conjunctive use of a desalination plant with existing water-supply wells.
- Instream flow litigation, Putah Creek, Yolo and Solano Counties, CA – Expert witness in a trial challenging the adequacy of instream flows below Monticello Dam.

1982-1990

Hydrologist, U.S. Geological Survey *Sacramento, CA*

- Groundwater model of Salinas Valley groundwater basin, Monterey County, CA – Developed one of the earliest models of the Salinas Valley groundwater basin and applied optimization theory to conjuncitve use operations.
- Groundwater flow model, Los Osos, CA – Created a groundwater flow model to evaluate 3-D interactions of Los Osos Creek, the Pacific Ocean and groundwater flow in a layered coastal groundwater basin. Subsequently added solute transport module to estimate long-term nitrate impacts of a wastewater project.
- Groundwater flow and quality, Santa Rosa and San Simeon Creek basins, Cambria, CA – Managed a comprehensive investigation of groundwater conditions in two coastal stream valleys, and developed finite-element models to integrate data and explore management options.

ACADEMIC BACKGROUND

Master of Science, 1985, Water Science, University of California at Davis
Bachelor of Arts, 1979, Geology, Harvard University, Cambridge, MA

PROFESSIONAL AFFILIATIONS

American Institute of Hydrology – certified professional hydrogeologist
Groundwater Resources Association of California

DECLARATION OF
Testimony of Negar Vahidi

I**, Negar Vahidi,** declare as follows:

1. I am presently employed by Aspen Environmental Group, a contractor to the California Energy Commission, Siting, Transmission and Environmental Protection Division, as a **Senior Project Manager/Senior Land Use Technical Specialist**.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I prepared the staff testimony on **Land Use, Recreation and Wilderness** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 22, 2010 Signed: Original Signed by N. Vahidi

At: Agoura Hills, California

NEGAR VAHIDI

Senior Associate
Land Use, Policy Analysis, and Socioeconomics

ACADEMIC BACKGROUND

Master of Public Administration, University of Southern California, 1993
B.A. (with Highest Honors), Political Science, University of California, Irvine, 1991

PROFESSIONAL EXPERIENCE

Ms. Vahidi is an environmental planner with over 15 years of experience managing and preparing a variety of federal and State of California environmental, planning, and analytical documents for large-scale infrastructure and development projects. Ms. Vahidi brings the experience of being both a public and private sector planner, specializing in the integration and completion of NEPA and CEQA documentation, joint documentation, land use, socioeconomic, and public policy analysis, environmental justice analysis, and public and community involvement programs. Her diversity and experience in preparing NEPA, CEQA, and NEPA/CEQA joint documentation can be shown through a sample of her projects.

Aspen Environmental Group — 1992 to 1998 and 2001 to present

Ms. Vahidi has participated in CEQA and NEPA analyses of major utility development projects, providing public policy and land use expertise as well as managing Public Participation Programs. She has conducted land use analyses for major environmental assessments, including identification of ownership and land use types and identification of sensitive land uses and sensitive receptors. She has also gathered and analyzed information on State, federal and local laws, policies and regulations relevant to land uses and public policy. Her specific projects are described below.

- **TANC Transmission Project (TTP), several Northern California Counties.** Ms. Vahidi is currently serving as the Deputy Project Manager in charge of preparation of the EIR/EIS and guiding the CEQA/NEPA analysis. The Transmission Agency of Northern California (TANC) and Western Area Power Administration (Western), an agency of the U.S. Department of Energy (DOE), are the CEQA lead agency and NEPA lead agency, respectively. The TTP generally would consist of approximately 600 miles of new and upgraded 500 kilovolt (kV) and 230 kV transmission lines, substations, and related facilities generally extending from northeastern California near Ravendale in Lassen County to the California Central Valley through Sacramento and Contra Costa Counties and westward into the San Francisco Bay Area. Ms. Vahidi worked with TANC and Western to initiate the scoping process, including preparation of the NOP, preparing for scoping meetings, frameworking the EIR/EIS document, etc. She also led the preparation of the project scoping report.
- **Littlerock Reservoir Sediment Removal Project EIS/EIR, Palmdale, CA.** Ms. Vahidi is the Project Manager for this joint EIS/EIR evaluating the impacts of sediment removal alternatives for the Littlerock Reservoir and Dam on USFS Angeles National Forest (NEPA Lead Agency) lands in Los Angeles County. The Palmdale Water District (District) [CEQA Lead Agency] proposes to remove approximately 540,000 cubic yards of sediment from the reservoir (behind the dam) and haul it to off-site commercial gravel pits located 6 miles north of the dam site in the community of Littlerock. The project involves impacts to the arroyo toad, extensive coordination with USFWS for a Section 7 consultation, incorporation of new Forest Service Plan updates and requirements into the

analysis, preparation of the Forest Service required BE/BA, and analysis of compliance with federal air quality conformity requirements. Under Ms. Vahidi's direction, Aspen developed six different project alternatives for sediment removal, involving detailed hydraulics analysis and preparation of a hydraulics technical report. The most feasible of these alternatives (grade control structure) was chosen by the PWD as their proposed project to be evaluated in the EIS/EIR. In addition, the PWD is currently considering an additional alternative (use of a slurry line for sediment removal) presented by Aspen. Aspen is currently working on the Administrative Draft EIR/EIS and assisting the PWD with portions of their Proposition 50 grant application to the DWR.

- **El Casco System Project, Riverside, CA.** Ms. Vahidi is serving as the Project Manager for this EIR being prepared for the CPUC to evaluate SCE's application for a Permit to Construct (PTC) the El Casco System Project. The Proposed Project would be located in a rapidly growing area of northern Riverside County, which includes the Cities of Beaumont, Banning, and Calimesa. A 115 kV subtransmission line begins at Banning Substation and extends westward toward the proposed El Casco Substation site within the existing Banning to Maraschino 115 kV subtransmission line and Maraschino–El Casco 115 kV subtransmission line ROWs. Major issues of concern include impacts to existing and residential land uses, which have led to the development of a partial underground alternative and a route alternative different than the project route proposed by SCE (the Applicant). The 1,200-page Draft EIR was released for a 45-day public review and comment on December 12, 2007, and evaluates project alternatives at the same level of detail as the Proposed Project analysis.
- **Sacramento Area Voltage Support Supplemental Environmental Impact Statement (SEIS), Western Area Power Administration.** Ms. Vahidi served as the task leader for several social science sections for the SEIS for a double-circuit 230 kV circuit between Western's O'Banion/Sutter Power Plant and Elverta Substation/Natomas Substation. New transmission lines and transmission upgrades are needed to mitigate transmission line overload, reduce the frequency of automatic generation and load curtailment during the summer peak load periods, and help maintain reliability of the interconnected system operation. Ms. Vahidi directed the preparation of the land use, aesthetics, socioeconomics, and environmental justice sections of the SEIS.
- **Sunset Substation and Transmission and Distribution Project CEQA Documentation, Banning, CA.** The City of Banning proposes to construct the Sunset Substation and supporting 33-kilovolt (kV) transmission line that would interconnect with the City's existing distribution system. The purpose of this new substation and transmission is to relieve the existing overloads that are occurring within the City's electric system and to accommodate projected growth in the City. Ms. Vahidi served as the Environmental Project Manager for the initial stages of CEQA documentation prepared for the City's Utility Department.
- **San Onofre Nuclear Generating Station (SONGS) Steam Generator Replacement Project, San Clemente, CA.** Ms. Vahidi served as the Technical Senior in charge of developing the methodology and guiding the analysis for the Land Use and Recreation Section of this EIR. This project EIR addressed the environmental effects of SCE's proposed replacement of Steam Generator Units 2 & 3 at the SONGS Nuclear Power Plant located entirely within the boundaries of the U.S. Marine Corps Base Camp (MCBCP) Pendleton. Issues of concern included potential conflicts resulting from the transport of the large units through sensitive recreation areas such as beaches, and the San Onofre State Park.
- **Diablo Canyon Power Plant (DCPP) Steam Generator Replacement Project, San Luis Obispo County, CA.** Ms. Vahidi served as the Technical Senior in charge of developing the methodology and guiding the analysis for the Land Use and Recreation Section of this EIR. The EIR addressed impacts associated with the replacement of the eight original steam generators (OSGs) at DCPP Units 1 and 2 due to degradation from stress and corrosion cracking, and other maintenance difficulties. The Proposed Project would be located at the DCPP facility, which occupies 760 acres within PG&E's 12,000-acre owner-controlled land on the California coast in central San Luis Obispo County. Land

use issues of concern include impacts to agricultural lands, recreational resources, and potential Coastal Act inconsistencies.

- **Cabrillo Port Liquefied Natural Gas (LNG) Deepwater Port, Ventura County, CA.** Under contract to the City of Oxnard, Aspen was tasked to review the Draft EIS/EIR for this the proposed construction and operation of an offshore floating storage and regasification unit (FSRU) that would be moored in Federal waters offshore of Ventura County. As proposed, liquefied natural gas (LNG) from the Pacific basin would be delivered by an LNG Carrier to and offloaded onto, the FSRU; re-gasified; and delivered onshore via two new 21.1-mile (33.8-kilometer), 24-inch (0.6-meter) diameter natural gas pipelines laid on the ocean floor. These pipelines would come onshore at Ormond Beach near Oxnard, California to connect through proposed new onshore pipelines to the existing Southern California Gas Company intrastate pipeline system to distribute natural gas throughout the Southern California region. Ms. Vahidi reviewed the document for technical adequacy and assisted the City in preparing written comments for the following sections of the EIS/EIR: Aesthetics, Land Use, Recreation, Socioeconomics, and Environmental Justice.
- **Long Beach LNG Import Project, Long Beach, CA.** Under contract to the City of Long Beach, Aspen was tasked to review the Draft EIS/EIR for the proposed construction and operation of this onshore LNG facility to be located at the Port of Long Beach. Ms. Vahidi reviewed the document for technical adequacy and assisted the City in preparing written comments for the following sections of the EIS/EIR: Aesthetics, Land Use, Recreation, Socioeconomics, Environmental Justice, and Port Master Plan Amendment.
- **Post-Suspension Activities of the Nine Federal Undeveloped Units and Lease OCS-P 0409, Offshore Southern California**. Aspen assisted the U.S. Department of the Interior, Minerals Management Service (MMS) to prepare an Environmental Information Document (EID) evaluating the potential environmental effects associated with six separate suspensions for undeveloped oil and gas leases Pacific Outer Continental Shelf (OCS) located offshore Southern California. These undeveloped leases lie between 3 and 12 miles offshore Santa Barbara, Ventura and southern San Luis Obispo Counties and are grouped into nine units, with one individual lease that is not unitized. As the Senior Aspen social scientist, Ms. Vahidi guided the analysis of community characteristics and tourism resources, recreation, visual resources, social and economic environment, and military operations.
- **Otay River Watershed Management Plan (ORWMP) and Special Area Management Plan (SAMP) in San Diego County, CA.** Ms. Vahidi served as a Technical Senior for social science and land use issues. The ORWMP focused on developing strategies to protect and enhance beneficial uses within this watershed and thereby comply with the San Diego Region's NPDES permit, and the SAMP intended to achieve a balance between reasonable economic development and aquatic resource preservation, enhancement, and restoration in this 145-square-mile (93,000 acres) area through the issuance of Corps and CDFG programmatic permits.

California Energy Commission (CEC)

In response to California's power shortage, Aspen has assisted the CEC in evaluating the environmental and engineering aspects of new power plant applications throughout the State under three separate contracts. Ms. Vahidi has served as Technical Senior for land use (since 2001), and a specialist for socio-economics and environmental justice, and alternatives analyses and special studies. Her specific projects are listed below.

- Technical Assistance in Application for Certification Review (Contract # 700-99-014; 3/6/2000 through 12/31/2003)
  - **Woodland Generation Station No. 2, Modesto, CA**. As the land use Technical Specialist, prepared the Land Use and Recreation, and Agricultural Resources Staff Assessments of this 80-megawatt nominal, natural gas-fired power generating facility and associated linear facilities (i.e., gas and water pipeline and

transmission line. The Staff Assessment evaluated potential impacts on nearby residential, recreational, and agricultural land uses, including important farmlands being traversed by linear faculties.

- **Valero Cogeneration Project, Benicia, CA**. Prepared the Socioeconomics Staff Assessment for a proposed cogeneration facility at the Valero Refinery in Benicia. Issues addressed included impacts on public services and other project-related population impacts such as school impact fees.
- **Rio Linda/Elverta Power Project, Sacramento, CA**. Prepared the Socioeconomics Staff Assessment for a 560-megawatt natural gas power plant in the northern Sacramento County. Issues of importance included environmental justice and impacts on property values.
- **Magnolia Power Project, Burbank, CA**. As the Socioeconomics technical specialist, prepared the Staff Assessment for this nominal 250-megawatt natural gas combined-cycle fired electrical generating facility to be located at the site of the existing City of Burbank power plant. Environmental justice issues and potential impacts on local economy and employment were evaluated
- **Potrero Power Plant Project, San Francisco, CA**. Prepared the land use portion of the Alternatives Staff Assessment for this proposed nominal 540 MW natural gas-fired, combined cycle power generating facility. Analysis included review of several alternative sites for development of the power plant and the comparative merits of those alternatives with the proposed site located on the San Francisco Bay.
- **Los Esteros Critical Energy Facility, San Jose, CA.** Technical Senior for the Land Use Staff Assessment of this 180-megawatt natural-gas-fired simple cycle peaking facility. Issues included potential impacts resulting from loss of agricultural land, and impacts associated with the project's non-compliance with local General Plan land use and zoning designations.
- **East Altamont Energy Center, Alameda County, CA.** Technical Specialist for the Land Use Assessment for a 1,100-megawatt nominal, natural gas-fired power plant and associated linear facilities. Provided expert witness testimony on Land Use Staff Assessment. Major issues addressed in the Staff Assessment included loss of Prime Farmlands, recommendation of land preservation mitigation, and the project's non-compliance with local General Plan land use and zoning designations.
- **Tracy Peaker Project, Tracy, CA.** Technical Senior for the Land Use Staff Assessment of this 169-megawatt simple-cycle peaking facility in an unincorporated area of San Joaquin County. Provided expert witness testimony on Land Use Staff Assessment. Issues included potential impacts resulting from loss of agricultural land under Williamson Act Contract, and evaluation of cumulative development in the fast-growing surrounding area.
- **Avenal Energy Project, Kings County, CA.** Socioeconomics Technical Specialist for this 600-megawatt combined cycle electrical generating facility, and associated linear facilities.
- **Tesla Power Project, Alameda County, CA.** Land Use Technical Senior and Alternatives Technical Specialist in charge of preparation of two Staff Assessments for this project. The project will be a nominal 1,120-MW electrical generating power plant with commercial operation planned for third quarter of 2004. The Tesla Power Project will consist of a natural gas-fired combined cycle power generator, with 0.8 miles of double-circuit 230-kilovolt transmission line connected to the Tesla PG&E substation, 24-inch 2.8-mile natural gas pipeline, and 1.7-mile water line constructed along Midway Road.
- **Sacramento Municipal Utility District Consumes Power Plant Project, Sacramento, CA.** Socioeconomics and Alternatives Technical Specialist in charge of preparation of two Staff Assessments for this nominal 1,000-megawatt (MW) combined-cycle natural gas facility. Provided expert witness testimony on Socioeconomics Staff Assessment. The project would include the construction and operation of a natural gas power plant at the Rancho Seco Nuclear Plant, 25 miles southeast of the City of Sacramento, in Sacramento County. The project would be located on a 30-acre portion of an overall 2,480-acre site owned by SMUD.
- **Inland Empire Energy Center, Riverside County, CA.** Technical Specialist for the Land Use Assessment for a 670-megawatt natural gas-fired, combined-cycle electric generating facility and associated linear facilities including, a new 18-inch, 4.7-mile pipeline for the disposal of non-reclaimable wastewater, and a new 20-inch natural gas pipeline. Provided expert witness testimony on Land Use Staff Assessment. The project would be located on approximately 46-acres near Romoland, within Riverside County. Major issues addressed in the Staff Assessment included potential loss of agricultural lands, impacts to planned school uses, and the project's potential non-compliance with local General Plan land use and zoning designations.

- **Senior Technical Lead, Land Use Resources.** The California Energy Commission (CEC) requested that the Aspen Team provide Technical Seniors for the Land Use Resources area in order to help coordinate and review Land Use Resource Assessments. As a Technical Senior, Negar Vahidi was responsible for the technical review of Land Use sections for various power plants assigned to them.
- **Legislative Bill Review.** As a Land Use Technical Senior for the CEC, Ms. Vahidi conducted legislative bill review related to energy facilities siting. She conducted portions of the CEC Systems Assessment & Facilities Siting Division analysis of Senate Bill 1550 which was intended to give the Superintendent of Public Instruction/CDE approval authority over siting of power plants within one mile of existing or proposed K-12 school sites by requiring the CDE (in coordination with the State Architect, and the commission) to develop appropriate siting guidelines.

- Engineering & Environmental Technical Assistance to Support the Energy Facility Planning and Licensing Program Contract (Contract # 700-02-004; 6/30/03 through 3/30/06)
  - **Environmental Performance Report (EPR).** Ms. Vahidi managed the preparation of the Socioeconomics chapter of the EPR for the California Energy Commission, which eventually became part of the State of California's Integrated Energy Policy Report (IEPR). The Socioeconomics chapter addressed: the importance of reliable and affordable electricity supply power plant construction and operation impacts, including labor force, taxation, etc.; and trends in the energy section, including renewable power sources such as wind and solar. She also conducted the analysis of a new portion of the Land Resources Chapter, which addressed the siting and land use issues associated with renewable power. This new portion of the land use analysis compared the land use and siting constraints associated with renewable power infrastructure such as wind and solar versus other forms of power infrastructure, such as gas pipelines, transmission lines, LNG facilities, and power plants.
  - **Coastal Plant Study.** Ms. Vahidi served as the Social Sciences Task Manager for this special study being conducted as part of Aspen's contract with the California Energy Commission. The study included identification and evaluation of potential issues associated with the possible modernization, re-tooling, or expansion of California's 25 coastal power plants including: northern California power plants such as Humboldt, Potrero, Hunter's Point, Pittsburg, and Oakland; central coast power plants such as Contra Costa, Diablo Canyon Nuclear, Morro Bay, Moss Landing, Elwood, Mandalay, and Ormond Power Plants; and southern California power plants such as the Alamitos, Long Beach, Los Angeles Harbor, Haynes, Redondo Beach, Scattergood, El Segundo, Huntington Beach, Encina, Silver Gate, South Bay, and San Onofre Nuclear. As Task Manager her responsibilities included, identification of potential political, social, community, and physical land use impacts that may arise from the potential increased output of energy from plants in highly sensitive coastal communities. The intent of the study is to identify red flag items for the Energy Commission in order to streamline future licensing processes. Her task as the Social Science Task Manager also included a thorough review of applicable Local Coastal Plans, and Coastal Commission regulations associated with Coastal Development Permits and Consistency Determinations.
  - **Natural Gas Market Outlook Report (NGMOR**). Ms. Vahidi assisted the CEC's Natural Gas Unit as a technical editor in their preparation and publication of the NGMOR. She managed Aspen's efforts, including format and graphics, to edit technical sections prepared by Natural Gas Unit Staff under a condensed time frame. The Preliminary NGMOR was released for public review in June 2003.

- Peak Workload Support for the Energy Facility Siting Program and the Energy Planning Program (Contract #700-05-002; 4/11/06 through 3/30/09)
  - **Chula Vista Energy Upgrade Project, Chula Vista, CA.** Senior Technical Specialist for the Land Use Staff Assessment for MMC Energy, Inc.'s Application for Certification (AFC) to construct and operate replacements and upgrades of equipment at the Chula Vista Power Plant, located on a 3.8-acre parcel in the City of Chula Vista's Main Street Industrial Corridor and within the City's Light Industrial zoning district. Issues of concern include the impacts of the power plant on adjacent residential and open space land uses, and compliance with applicable local LORS. Provided expert witness testimony on Land Use Staff Assessment.
  - **Ivanpah Solar Electric Generating System Project, San Bernardino County, CA.** Senior Technical Specialist for the Socioeconomics Staff Assessment/BLM EIS for a 400-megawatt solar thermal electric power generating system. The project's technology would include heliostat mirror fields focusing solar energy on power tower receivers producing steam for running turbine generators. Related facilities would

include administrative buildings, transmission lines, a substation, gas lines, water lines, steam lines, and well water pumps. The proposed project would be developed entirely in the Mojave Desert region of San Bernardino County, California. The document was prepared in compliance with both NEPA and CEQA requirements.

- **Sentinel Energy Project, Riverside County, CA.** Senior Technical Specialist for the Land Use Staff Assessment for CPV Sentinel's Application for Certification (AFC) to construct and operate an 850-megawatt (MW) peaking electrical generating facility near SCE's Devers Substation. The proposed project site consists of 37 acres of land situated approximately eight miles northwest of the center of the City of Palm Springs with portions of the construction laydown area and natural gas pipeline within the Palm Springs city limits. Land use issues of concern include the project's compliance with local LORS.
- **Carrizo Energy Solar Farm, San Luis Obispo County, CA.** Senior Technical Specialist for the Land Use Staff Assessment for Carrizo Energy, LLC's Application for Certification (AFC) to build the Carrizo Energy Solar Farm (CESF), which will consist of approximately 195 Compact Linear Fresnel Reflector (CLFR) solar concentrating lines, and associated steam drums, steam turbine generators (STGs), air-cooled condensers (ACCs), and infrastructure, producing up to a nominal 177 megawatts (MW) net. The CESF is located in an unincorporated area of eastern San Luis Obispo County, west of Simmler and northwest of California Valley, California. The CESF includes the solar farm site, a minimal offsite transmission system connection, and construction laydown area. The CESF site will encompass approximately 640 acres of fenced area in an area zoned for agricultural uses as specified in the San Luis Obispo County General Land Use Plan. Issues of concern include the impacts of the power plant on adjacent land uses and compliance with applicable local LORS.
- **Carlsbad Energy Center Project, Carlsbad, CA.** Senior Technical Specialist for the Land Use and Alternatives Staff Assessments for Carlsbad Energy Center, LLC's Application for Certification (AFC) to build the Carlsbad Energy Center Project (CECP), which will consist of a 558 MW gross combined-cycle generating facility configured using two units with one natural-gas-fired combustion turbine and one steam turbine per or unit. Issues of concern include major incompatibilities with local LORS, and cumulative impacts from widening of I-5.
- **Marsh Landing Generating Station, Contra Costa County, CA.** Senior Technical Specialist for the Land Use Staff Assessment for the Mirant Marsh Landing, LLC AFC for a 930 MW natural gas-fired power plant, which would be would be sited adjacent to the existing Contra Costa Power Plant in unincorporated Contra Costa County, near the City of Antioch.
- **Canyon Power Plant, Anaheim, CA.** Senior Technical Specialist for the Socioeconomics Staff Assessments for a nominal 200 megawatt (MW) simple-cycle plant, using four natural gas-fired combustion turbines and associated infrastructure proposed by Southern California Public Power Authority (SCPPA). This project is a peaking power plant project located within the City of Anaheim, California.
- **Willow Pass Generating Station, Pittsburg, CA.** Senior Technical Specialist for the Land Use Staff Assessment for a new, approximately 550-megawatt (MW) dry-cooled, natural gas-fired electric power facility proposed by Mirant. Development of Willow Pass would entail the construction of two generating units and ancillary systems including, adjacent electric and gas transmission lines, and water and wastewater pipelines.
- **Marsh Landing Generating Station, Contra Costa County, CA.** Senior Technical Specialist for the Land Use Staff Assessment for a new, 930-megawatt (MW) gas-fired electric generating facility proposed by Mirant. Delta. The proposed 27-acre Project site would be located at the existing Contra Costa Power Plant.
- **Stirling Energy Systems Solar One, San Bernardino County, CA.** Senior Technical Specialist for the Land Use Staff Assessment/BLM EIS for a nominal 850-megawatt (MW) Stirling engine project, with construction planned to begin late 2010. The primary equipment for the generating facility would include the approximately 30,000, 25-kilowatt solar dish Stirling systems (referred to as SunCatchers), their associated equipment and systems, and their support infrastructure. Major issues of concern include the conversion of approximately 8,230 acres of open space to industrial uses, compliance with BLM's CDCA Plan, etc.
- **Stirling Energy Systems Solar Two, Imperial County, CA.** Senior Technical Specialist for the Land Use Staff Assessment/BLM EIS for a nominal 750-megawatt (MW) Stirling engine project, with construction

planned to begin either late 2009 or early 2010. The primary equipment for the generating facility would include the approximately 30,000, 25-kilowatt solar dish Stirling systems (referred to as SunCatchers), their associated equipment and systems, and their support infrastructure. Major issues of concern include conversion of 6,500 acres of public recreation land used for OHV use and camping, and compliance with the BLM's CDCA plan..

- **GWF Tracy Combined Cycle Power Plant, San Joaquin County, CA.** Senior Technical Specialist for the Land Use Staff Assessment for GWF's proposal to modify the existing TPP (see description above), a nominal 169-megawatt (MW) simple-cycle power plant, by converting the facility into a combined-cycle power plant with a nominal 145 MW, net, of additional generating capacity.
- **City of Palmdale Hybrid Power Plant Project, Palmdale, CA.** Senior Technical Specialist for the Land Use Staff Assessment for the Palmdale Hybrid Power Project (PHPP) proposed by the City of Palmdale. The PHPP consists of a hybrid of natural gas-fired combined-cycle generating equipment integrated with solar thermal generating equipment to be developed on an approximately 377-acre site in the northern portions of the City of Palmdale (City).
- **Lodi Energy Center, Lodi, CA.** Senior Technical Specialist for the Socioeconomics Staff Assessment for a combined-cycle nominal 225-megawatt (MW) power generating facility.
- **Abengoa Mojave Solar One Project, San Bernardino County, CA.** Senior Technical Specialist for the Land Use Staff Assessment of a nominal 250 megawatt (MW) solar electric generating facility to be located near Harper Dry Lake in an unincorporated area of San Bernardino County. Issues of concern include the impacts associated with the conversión of 1,765 acres of open space lands.
- **Genesis Solar Energy Project, Riverside County, CA.** Senior Technical Specialist for the Land Use Staff Assessment/BLM EIS for two independent solar electric generating facilities with a nominal net electrical output of 125 megawatts (MW) each, for a total net electrical output of 250 MW. Electrical power would be produced using steam turbine generators fed from solar steam generators. The project is located approximately 25 miles west of the city of Blythe. Major issues of conern include conversión of 4,460 acres of BLM lands to an industrial use.
- **Contra Costa Generating Station, Contra Costa County, CA.** Senior Technical Specialist for the Land Use Staff Assessment for a natural gas-fired, combined-cycle electrical generating facility rated at a nominal generating capacity of 624 megawatts (MW). The project would be located in the City of Oakley.

- **Topaz Solar Project EIR, San Luis Obispo County, CA.** (Applicant: First Solar). Aspen is managing preparation of an EIR for this 500 MW solar photovoltaic project in the Carrizo Plain area. A major issue of concern is the conversion of approximately 6,000 acres of open space (60 percent of which are under land preservation contracts) to an industrial use. Ms. Vahidi is the Senior in charge of developing the methodology, approach, and thresholds of significance for analysis of impacts related to agricultural land conversion using the CA Department of Conservation LESA Model. One major issue of concern related to agricultural resources is impacts to lands under Williamson Act contracts. She will be guiding the analysis.
- **California Valley Solar Ranch EIR, San Luis Obispo County, CA.** (Applicant: SunPower). Aspen is managing preparation of an EIR for this 250 MW solar photovoltaic project in the Carrizo Plain area. A major issue of concern is the conversion of approximately 4,000 acres of open space to an industrial use. Ms. Vahidi is the Senior in charge of developing the methodology, approach, and thresholds of significance for analysis of impacts related to agricultural land conversion using the CA Department of Conservation LESA Model. She will be guiding the analysis.
- **Santa Ana Valley Pipeline Repairs Project, San Bernardino and Riverside Counties, CA.** Under Aspen's on-going environmental services contract with the DWR, Ms. Vahidi served as the project manager for CEQA documentation and permitting efforts related to the repair of 12 sites along the pipeline portion of the East Branch of the California Aqueduct. The repair of the 12 sites was crucial because, eight of the Priority 1 sites included areas of the pipeline that were under high stress and subject to rupture. Issues of concern included, potential impacts to special status species, sensitive receptors, and traffic. As the DWR's CEQA consultant, Ms. Vahidi determined that the proposed SAPL Repairs Project would qualify for a CEQA Categorical Exemption, and recommended the preparation

of a Technical Memorandum to justify this exemption. The Technical Memorandum and supporting documentation, including a Biological Constraints Report, and analyses of proposed project potential construction-related air quality, noise, and traffic impacts, were prepared and presented to DWR as one packet to support both a Class 1 and Class 2 CEQA Exemption. Subsequent to preparation of this packet, DWR filed a Notice of Exemption on June 13, 2003 for their repair activities.

- **Piru Creek Erosion Repairs and Bridge Seismic Retrofit Project, Northern Los Angeles County, CA.** Under Aspen's on-going environmental services contract with the DWR, Ms. Vahidi served as the project manager for CEQA documentation for this project. An IS/MND was prepared to evaluate the impacts of the project, which proposed to maintain four access routes to DWR's facilities along the West Branch of the California Aqueduct downstream of the Pyramid Dam. Repair and improvement activities would occur on Osito Canyon (an intermittent tributary to Piru Creek) at Osito Adit, adjacent to Old Highway 99 at North Adit (or access tunnel), alongside an eroded section of Old Highway 99 along Piru Creek, and at Pyramid Dam Bridge. Repair activities would serve to improve conditions of access routes, as well as strengthening and reinforcing them against seismic or flood events. Project-related construction could result in potentially significant impacts to biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, and transportation and traffic.
- **Pyramid Lake Repairs and Improvements Project, northern Los Angeles County.** Under Aspen's on-going environmental services contract with the DWR, Ms. Vahidi served as the project manager for CEQA documentation, ADA (Americans with Disabilities Act) compliance, and permitting efforts for this project. DWR and the Department of Boating and Waterways (DBW) are planning repairs and improvements at various recreational sites at Pyramid Lake, which is located on the border between Los Padres National Forest and Angeles National Forest; recreation is managed by Angeles National Forest. The lake is also part of Federal Energy Regulatory Commission Project 2426. Aspen worked with DWR and DBW to determine ADA compliance components at each site. CEQA documentation in support of a Class 1 and 2 Categorical Exemption was prepared to evaluate the potential impacts of the repairs and improvements, and provide CEQA clearance for filing of required permit applications, including but not necessarily limited to 404, 401, and 1602 permits. In addition to the CEQA documentation and preparation of permit applications, Aspen coordinated DWR and DBW's efforts with the USFS, and the permitting agencies (i.e., CDFG, RWQCB, and USACE). Through coordination with the USAC, Aspen prepared the NEPA EA for Corps 404 permit process, and reviewed and coordinated revisions to the 1602 with CDFG.
- **Mulholland Pumping Station and Lower Hollywood Reservoir Outlet Chlorination Station Project, Los Angeles, CA.** Under Aspen's on-going environmental services contract with the City of Los Angeles Department of Water and Power (LADWP), Ms. Vahidi served as the Project Manager for preparation of CEQA documentation for this project. LADWP proposed to replace the existing historic pumping/chlorination station building as well as the existing lavatory and unoccupied Water Quality Laboratory buildings with a new single structure pumping/chlorination station within the LADWP's Hollywood Reservoir Complex located in the Hollywood Hills section of the City Los Angeles. These improvements were required due to the age and deterioration of the facility and the potential risk of seismic damage to existing structures. An Initial Study was prepared in support of a City of Los Angeles General Exemption.
- **River Supply Conduit (RSC) Upper Reach Project EIR, Los Angeles and Burbank, CA.** Under Aspen's on-going environmental services contract with the City of Los Angeles Department of Water and Power (LADWP), Ms. Vahidi served as the Task Leader for land use issues and is in charge of development and analysis of project alternatives for the CEQA document for this project. The RSC is a major transmission pipeline in the LADWP water distribution system. The existing RSC pipeline's purpose is to transport large amounts of water from the Los Angeles Reservoir Complex and local ground water wells to reservoirs and distribution facilities located in the central areas within of the City of Los Angeles. The LADWP proposed a new larger RSC pipeline to replace and realign the

Upper and Lower Reaches of the existing RSC pipeline, which would involve the construction of approximately 69,600 linear feet (about 13.2 miles) of 42-, 48-, 60-, 66-, 72-, 84-, and 96-inch diameter welded steel underground pipeline.

- **Valley Generating Station Site Survey & Documentation Report, Los Angeles, CA.** Ms. Vahidi managed the preparation of a comprehensive report (over 150 pages) documenting all of the structures and facilities located at the Valley Generating Station (VGS). The report includes exhibits that illustrate locations of each structure at the VGS, a detailed appendix of color photos of each structure, and a written description of each structure. The report also provides a general discussion of the history and background of the VGS and its development to provide a context for the structures on site.
- **Taylor Yard Water Recycling Project (TYWRP), Los Angeles and Glendale, CA.** Under Aspen's on-going environmental services contract with the City of Los Angeles Department of Water and Power (LADWP), Ms. Vahidi served as the Project Manager for preparation of CEQA documentation for this project. LADWP proposed to construct the TYWRP in order to provide recycled water produced by the Los Angeles–Glendale Water Reclamation Plant (LAGWRP) to the Taylor Yard. An important part of the City of Los Angeles' expanding emphasis on water conservation is the concept that water is a resource that can be used more than once. Because all uses of water do not require the same quality of supply, the City has been developing programs to use recycled water for suitable landscaping and industrial uses. The project is located in the southernmost part of the City of Glendale and northeastern part of the City of Los Angeles. The IS/MND was adopted in the Summer of 2007.
- **Devers–Palo Verde 500 kV Transmission Line Project EIS/EIR, southern California/western Arizona.** For this EIR/EIS prepared by U.S. Bureau of Land Management and CPUC, Ms. Vahidi served as the Deputy Project Manager and Social Sciences Issue Area Coordinator for SCE's proposed 250-mile transmission line project from the Palo Verde Nuclear power plant in Arizona to the northern Palm Springs area in California. Major issues of concern include EMF and visual impacts on property values, impacts on the area's vast recreational resources and tribal lands, and the development and evaluation of several route alternatives, including the Devers-Valley No. 2 Route Alternative, which eventually was approved by the CPUC.
- **Antelope-Pardee 500 kV Transmission Line Project EIR/EIS, Los Angeles County, CA.** For this EIR/EIS prepared by USFS, Angeles National Forest and CPUC, Ms. Vahidi is served as the Deputy Project Manager and Social Sciences Issue Area Coordinator for SCE's proposed 25-mile transmission line project from the Antelope Substation in the City of Lancaster, through the ANF, and terminating at SCE's Pardee Substation in Santa Clarita. Major issues of concern included impacts to biological, recreational, and cultural resources within Forest lands, EMF and visual impacts on property values, impacts on residences in the urbanized southern regions of the route, and the development and evaluation of several route alternatives.
- **Antelope Transmission Project, Segments 2 & 3 EIR, Los Angeles and Kern Counties, CA.** For this EIR being prepared by the CPUC, Ms. Vahidi served as the Deputy Project Manager and Social Sciences Issue Area Coordinator. The proposed Project includes both Segment 2 and Segment 3 of the Antelope Transmission Project, and involves construction of new transmission line infrastructure from the Tehachapi Wind Resource Area in southern Kern County, California, to SCE's existing Vincent Substation in Los Angeles County, California. The Tehachapi Wind Resource Area is one of the State's greatest potential sources for the generation of wind energy. A variety of wind energy projects are currently in development for this region. Major issues of concern include EMF and visual impacts on property values, impacts on residences and agricultural resources, and the development and evaluation of several substation and route alternatives.
- **Tehachapi Renewable Transmission Project (TRTP) EIR/EIS, Kern, Los Angeles, and San Bernardino Counties, CA.** For this EIR/EIS prepared by USFS, Angeles National Forest and CPUC,

Ms. Vahidi is served as the Deputy Project Manager in the early stages (i.e., during Scoping) of the project for SCE's proposal to construct, use, and maintain a series of new and upgraded high-voltage electric transmission lines and substations to deliver electricity generated from new wind energy projects in eastern Kern County. Approximately 46 miles of the project would be located in a 200- to 400-foot right-of-way on National Forest System land (managed by the Angeles National Forest) and approximately three miles would require expanded right-of-way within the Angeles National Forest. The proposed transmission system upgrades of TRTP are separated into eight distinct segments: Segments 4 through 11. Segments 1 (Antelope-Pardee) and Segments 2 and 3 (Antelope Transmission Project) were evaluated in separate CEQA and NEPA documents as described above.

- **Jefferson-Martin 230 kV Transmission Line Project EIR, San Francisco Bay Area, CA.** Ms. Vahidi served as the Issue Area Coordinator for the Social Science issues of the EIR, and was responsible for preparation of the socioeconomics, recreation, and public utilities sections of the EIR prepared on behalf of the California Public Utilities Commission (CPUC) to evaluate a proposed 27-mile transmission line in San Mateo County. Major issues of concern included EMF and visual impacts on property values, impacts on the area's vas recreational resources, and evaluation of several route alternatives.
- **Miguel-Mission 230 kV #2 Project EIR, San Diego, CA.** Ms. Vahidi conducted the land use, recreation, socioeconomics, and environmental justice analyses for this EIR for a proposed 230 kV circuit within an existing transmission line ROW between Miguel and Mission substations in San Diego County. The proposed project included installing a new 230 kV circuit on existing towers along the 35-mile ROW, as well as relocate 69 kV and 138 kV circuits on approximately 80 steel pole structures. In addition, the Miguel Substation and Mission Substation would be modified to accommodate the new 230 kV transmission circuit.
- **Viejo System Project, Orange County, CA.** Ms. Vahidi served as the Deputy Project Manager for the project's CEQA documentation, including and Initial Study, prepared on behalf of the CPUC to evaluate Southern California Edison's (SCE) Application for a Permit to Construct the Viejo System Project, which was in SCE's forecasted demand of electricity and goal of providing reliable electric service in southern Orange County. The Viejo System Project would serve Lake Forest, Mission Viejo, and the surrounding areas. Components of the project included, construction of the new 220/66/12 kilovolt (kV) Viejo Substation, installation of a new 66 kV subtransmission line within an existing SCE right-of-way, replacement of 19 double-circuit tubular steel poles with 13 H-frames structures, and minor modification to other transmission lines. Major issues of concern include visual impacts of transmission towers, EMF effects, and project impacts on property values.
- **MARS EIR/EIS, Monterey, CA.** Ms. Vahidi served as the technical specialist in charge of preparing the Environmental Justice analysis for this EIR/EIS, which would evaluate the effects associated with the installation and operation of the proposed Monterey Accelerated Research System (MARS) Cabled Observatory Project (Project) proposed by Monterey Bay Aquarium Research Institute (MBARI)[NEPA Lead Agency]. The goal of the Project was to install and operate, in State and Federal waters, an advanced cabled observatory in Monterey Bay that would provide a continuous monitoring presence in the Monterey Bay National Marine Sanctuary (MBNMS) as well as serve as the test bed for a state-of-the-art regional ocean observatory, currently one component of the National Science Foundation (NSF) Ocean Observatories Initiative (OOI). The Project would provide real-time communication and continuous power to suites of scientific instruments enabling monitoring of biologically sensitive benthic sites and allowing scientific experiments to be performed. The environmental justice analysis evaluated the potential for any disproportionate project impacts to both land-based populations and fisheries workers. The CEQA Lead Agency was CSLC.
- **Kinder Morgan Concord-Sacramento Pipeline EIR**. Ms. Vahidi prepared the environmental justice and utilities and service systems sections of an EIR evaluating a proposed 70-mile petroleum products pipeline for the California State Lands Commission. Analysis included consideration of potential impacts of pipeline accidents in Contra Costa, Solano, and Yolo Counties.

- **Shore Marine Terminal Lease Consideration Project EIR, Contra Costa County, CA.** Served as Aspen's Project Manager (under contract to Chambers Group, Inc.) in charge of conducting the preparation of the Land Use, Recreation, Air Quality, and Noise sections of this EIR evaluating Shore Terminal, LLC's application to the California State Lands Commission (CLSC) to exercise the first of two 10-year lease renewal options, with no change in current operations. Shore Terminals operations comprise the marine terminal and on-land storage facilities in an industrial part of the city of Martinez. The marine terminal is on public land leased from the CSLC with the upland storage facilities located on private land.
- **Looking Glass Networks Fiber Optic Cable Project IS/MND, northern and southern California.** As part of Aspen's ongoing contract with the CPUC for review of Telecommunications projects, this document encompassed the evaluation of project impacts and network upgrades in the San Francisco Bay Area and the Los Angeles Basin Area. Ms. Vahidi served as the Deputy Project Manager and Study Area Manager for the Los Angeles Basin for this comprehensive CEQA document reviewing the potential impacts of hundreds of miles of newly proposed fiber optic lines throughout northern and southern California, including Los Angeles and Orange Counties. Issues of concern focused on potential construction impacts of linear alignments in highly urbanized rights-of-way, and resultant land use, traffic and utilities conflicts.
- **U.S. Army Corps of Engineers, Los Angeles District.** Ms. Vahidi is responsible for managing Delivery Orders and conducting the analyses of the social science issue areas for 16 projects throughout southern California and Arizona as part of two environmental services contracts. Delivery orders have included:
  - **Northeast Phoenix Drainage Area Alternatives Analysis Report, Phoenix and Scottsdale, AZ.** As the project manager guided the preparation of an alternatives analysis report that evaluated the potential environmental impacts associated with channel and detention basin alternatives to control flooding problems resulting from fast rate of development in the northeast Phoenix area.
  - **Imperial Beach Shore Protection EIS/EIR, Imperial Beach, CA.** Responsible for preparing the affected environment and environmental consequences sections for the land use, recreation, aesthetics, and socioeconomics issue areas. This EIS will analyze the impacts of shore protection measures along a 4.7-mile stretch of beach in southwest San Diego County.
  - **U.S. Food and Drug Administration Laboratory EIS/EIR, Irvine, CA.** Prepared the land use and recreation; socioeconomics, public services, and utilities; and visual resources/aesthetics analyses for this proposed "mega-laboratory" on the University of California Irvine Campus. Also developed the cumulative projects scenario for analyses of cumulative impacts. As the Public Participation Coordinator for the EIS/EIR review process, prepared the NOP, set up the scoping meeting and public hearing, prepared meeting handouts, and developed the project mailing list.
  - **San Antonio Dam EIS, Los Angeles and San Bernardino Counties, CA.** Responsible for preparing the cultural resources, land use and recreation, and aesthetics sections for the analysis of impacts resulting from the re-operation of San Antonio Dam to increase flood protection.
  - **Rio Salado Environmental Restoration EIS, Phoenix and Tempe, AZ.** Conducted the land use and recreation, and aesthetics analyses for this environmental restoration project in the Salt River and Indian Bend Wash located in the Cities of Phoenix and Tempe. Incidental to the primary objective of the Proposed Action (environmental restoration) is the creation of passive recreational opportunities associated with the restored habitat areas, such as trails for walking and biking, and areas for observing wildlife and learning about the natural history of the river.
  - **Airspace Restrictions EA, Ft. Irwin, CA.** Conducted the land use, recreation, aesthetics, and socioeconomics analyses of impacts for the conversion of unrestricted airspace to restricted airspace above Ft. Irwin in the Mojave Desert.
  - **National Guard Armory Building EA, Los Angeles, CA.** Conducted the land use, aesthetics, and socioeconomics analyses and prepared the cumulative impacts and policy consistency sections.

- **Supplemental EA for the Seven Oaks Dam Woolly Star Land Exchange, San Bernardino County, CA.** Prepared the land use and recreation analyses and policy consistency section.
- **Lower Santa Ana River Operations and Maintenance EA, Orange County, CA.** Responsible for conducting the land use, recreation, aesthetics, socioeconomics, and cultural resources analyses.
- **EA for Area Lighting, Fencing, and Roadways at the International Border, San Diego, CA.** Conducted the land use, aesthetics, and socioeconomics analyses and prepared the policy consistency section.
- **Border Patrol Checkpoint Station EA, San Clemente, CA.** Analyzed the aesthetic impacts of the installation of a concrete center divider and a Pre-inspected Automated Lane adjacent to and parallel to Interstate 5.
- **Upper Newport Bay Environmental Restoration Project, Newport Beach, CA.** Prepared physical setting, socioeconomics, land and water uses, and cultural resources sections for the Baseline Conditions Report and the Environmental Planning Report.
- **Whitewater/Thousand Palms Flood Control Project, Thousand Palms, CA.** Prepared the land use and recreation, aesthetics, and socioeconomics affected environment sections for the project's Baseline Conditions Report that was incorporated into the project EIS.
- **San Antonio Creek Bridges Project, Vandenberg Air Force Base, CA.** Prepared the physical setting, land use, socioeconomics, utilities, and aesthetics sections for analyses of bridge alternative impacts for missile transport on Vandenberg Air Force Base.
- **Ft. Irwin Expansion Mitigation Plan, Mojave Desert, CA.** Responsible for developing Ft. Irwin's Public Access Policy based on mitigation measures from the Army's Land Acquisition EIS for the National Training Center. Policy includes provisions for access by research and scientific uses.

- **Los Angeles Unified School District (LAUSD), Los Angeles County, CA.** Ms. Vahidi is Program Manager for Aspen's Environmental Master Services Agreement with the LAUSD (nation's second largest school district) to prepare CEQA documents (EIRs, IS/MNDs, Categorical Exemptions) in review of the LAUSD's four-phased new school construction program intended to meet existing and projected overcrowded conditions (200,000 seat shortfall) within the LAUSD (i.e., City of Los Angeles and all or parts of 28 surrounding jurisdictions cover 700 square miles of land). As the Program Manager, she is responsible for client interface and providing CEQA expertise to the LAUSD on day-to-day basis, QA/QC activities for all Aspen documents submitted, budget tracking and allocation, staff assignments, and the general day-to-day management of this contract. Thus far, Aspen has been awarded 48 CEQA document assignments for new school projects, school expansions and additions. In addition to her duties as the contract manager, Ms. Vahidi has managed the preparation of several CEQA documents under this contract, including:
  - **East Valley Middle School No. 2 EIR.** This middle school was proposed to be located at the previous Van Nuys Drive-In site. The EIR focused on impacts associated with air quality, hazards and hazardous materials, noise, land use and planning, and traffic and transportation. Major issues of concern included traffic and noise generated by school operation activities. The EIR included LAUSD design standards and measures employed to minimize environmental impacts.
  - **Canoga Park New Elementary School IS/MND.** This elementary school would be developed on a parcel of land owned by the non-profit organization, New Economics For Women (NEW). This "Turn-Key" project consisted of a Charter Elementary School to be developed by NEW and sold to the LAUSD for operation. It was later decided that NEW would lease the school back and run it as a charter school. Issues of concern included, pedestrian safety, traffic, air quality, noise, and land use.
  - **Mt. Washington Elementary School Multi-Purpose Room Addition Project IS/MND.** This project proposed the development of a multi-purpose room facility, including a library, auditorium, and theater, to the existing Mt. Washington Elementary School campus located in Los Angeles. The surrounding residential community had concerns regarding the proposed project's impacts on aesthetics, traffic, air quality, and noise. Of particular concern, were impacts generated due to the after-hours use of the multi-purpose room facility by civic and community groups.

- **New School Construction Program EIR.** Serves as a Study Area Manager (Valley Districts), and Issue Area Coordinator (IAC) (i.e., technical lead and reviewer) for social science issues, including land use, socioeconomics, public services, population and housing, and utilities and service systems. As the IAC, she has formulated the scope of work and methodology for analysis of issues and mitigation options. In addition to her managerial duties, Ms. Vahidi is preparing the Land Use section of the EIR, and directing the preparation of the Project's Scoping Report.
- **Belmont Senior High School 20-Classroom Modular Building Addition Project.** Under Aspen's on-going master services agreement with the LAUSD, served as the project manager for CEQA documentation and permitting efforts related to the addition of modular classrooms to the existing Belmont Senior High School campus. Issues of concern included, potential impacts to sensitive receptors adjacent to the school from construction-related air quality, noise, and traffic, and operation-related noise generated by the new classrooms. As the LAUSD's CEQA consultant, Ms. Vahidi directed the preparation of technical documentation in support of a Class 32 In-Fill CEQA Categorical Exemption. This technical documentation included analyses of potential project-related air quality, noise, and traffic impacts, which were then submitted to LAUSD as one packet. Subsequent to preparation of this packet, LAUSD filed a CEQA Notice of Exemption for the classroom addition project.
- **Narbonne High School Stadium Lighting Project MND Addendum.** Served as the project manager for this project proposed to add a new stadium, lighting, and associated sport facilities needed to address existing needs at Narbonne High School. Issues of concern include lighting impacts to the surrounding neighborhood, and available parking stock.

- **SCE Calnev Power Line and Substation Project IS/MND.** Aspen was contracted to thoroughly review and analyze Southern California Edison Company's Application for a Permit to Construct and Proponent's Environmental Assessment (PEA) for the Calnev Power Line and Substation Project in the City of Colton. Ms. Vahidi served as the Deputy Project Manager for preparation of the IS/MND. Tasks include: a site visit, and evaluation of the project's compliance with the Commission's General Order 131D, Rule 17.1, and associated information submittal requirements; and preparation of a letter report identifying data deficiencies of the Application and PEA. Upon formal CPUC acceptance of the Application and PEA, Aspen prepared a CEQA Initial Study Checklist by identifying baseline data, project characteristics, and determining impact significance for each issue area. Each issue area's impact determination was supported by a paragraph or more of analysis describing the rationale for the impact identified, or for the lack of a significant impact. Upon completion of the Initial Study, the Mandatory Findings of Significance were prepared and Aspen determine that a Mitigated Negative Declaration should be prepared per CEQA Guidelines.
- **SCE Six Flags Substation and Power Line Project IS/MND.** Ms. Vahidi served as Deputy Project Manager for preparation of the IS/MND. Reviewed and provided comments on the permit application by SCE to construct a substation and power line to provide electrical service to Six Flags Amusement Park in Valencia, CA. Subsequent to the application completeness review, she prepared the project's Initial Study Checklist and Mitigated Negative Declaration for the California Public Utilities Commission (CPUC). Identified possible deficiencies and provided recommendations.
- **Industrywide Survey for the South Coast Air Quality Management District.** Ms. Vahidi coordinated Aspen's work for an Air Toxics Survey of harmful emissions by auto body and paint shops, performed in compliance with AB2588. She was responsible for development of an industrywide emission inventory for these facilities; she also performed information management, facility verifications, survey mail-outs, emissions calculations, analysis of calculated results, and preparation of the final report.
- **Technical Support to NEPA Lawsuit, Angeles National Forest, CA.** Ms. Vahidi prepared a detailed project chronology and a list of all applicable federal, State, and local laws and regulations in support of the USDA Office of General Counsel and National Forest's response to the City of Los Angeles' 1996 lawsuit on the adequacy of the Pacific Pipeline EIS.
- **Yellowstone Pipeline EIS, Lolo National Forest, Montana.** Environmental Justice and Public Services Issue Area Specialist. Responsible for conducting the analysis of project impacts on minority and

low-income populations to comply with Presidential Executive Order 12898 on Environmental Justice using Census data to determine population density, minority population percentages and unemployment rates to determine the potential for disproportionate project impacts on affected communities. Also responsible for conducting analysis of project impacts such as population inmigration and pipeline accidents on public services in western Montana. During the EIS scoping process, she served as the project public participation coordinator and was responsible for preparation of the project newsletter, setup of the first round of scoping meetings, and determination of project information centers.

- **Santa Fe Pacific Pipeline Project EIR.** Ms. Vahidi was responsible for development and screening of alternatives for a 13-mile petroleum products pipeline from Carson to Norwalk, CA. Prepared analyses of project impacts on socioeconomics, public services, utilities, and aesthetics.
- **Pacific Pipeline Project Mitigation Monitoring, Compliance, and Reporting Program (MMCRP).** Ms. Vahidi served as the expert technical reviewer for the socioeconomics and environmental justice issues. As the MMCRP Agency Liaison, was responsible for developing protocol for efficient interagency communication procedures in coordination of mitigation activities with the CPUC, USFS, Responsible Agencies, and the project proponent. Also responsible for the development and management of the MMCRP Community Outreach and Public Access Program.
- **Pacific Pipeline Project EIR.** For the California Public Utilities Commission's (CPUC) EIR on the originally proposed route of this proposed pipeline (from Santa Barbara County to Los Angeles), Ms. Vahidi developed and coordinated a public participation program to comply with CEQA's mandate for information disclosure and public involvement in decision-making. The Final EIR was certified in September 1993.
- **Pacific Pipeline Project EIS and Subsequent EIR.** Ms. Vahidi prepared the socioeconomics and public services analysis, the Environmental Justice analysis in compliance with Presidential Executive Order 12898, as well as portions of the Land Use and Public Recreation analyses, including a comprehensive comparative analysis of project alternatives on this EIS/Subsequent EIR for the U.S. Forest Service (Angeles National Forest) and the CPUC. Ms. Vahidi managed the subsequent GIS mapping of socioeconomic data relative to pipeline corridor alternatives and other industrial facilities. She also prepared the cumulative projects list (covering a five county area for the Proposed Project and its alternatives) used for the cumulative scenario analyses of the various issue areas in the EIS/SEIR. As the Public Participation Program Coordinator for the project, she developed, implemented, and managed the public involvement efforts for the NEPA and CEQA environmental review processes. This included: setup and logistics for 20 separate scoping meetings, informational workshops, and public hearings along the project route; preparation of all meeting handouts; preparation of project newsletters and public notices; placement of project documents on Internet; and maintenance of the a project telephone information hotline. She also reviewed over 2,000 public comments (written and verbal) received on the Draft EIS/SEIR, for subsequent distribution to the project team.
- **Alturas Transmission Line Project EIR/EIS.** Ms. Vahidi conducted the analysis of potential impacts on minority populations and low-income populations in compliance with Presidential Executive Order 12898 on Environmental Justice using Census data to determine population density, minority population percentages and unemployment rates, and the potential impacts of the transmission line on affected communities. She also prepared the cumulative projects list and map used for analyses of cumulative impacts. She managed development of meeting handouts; scheduling and logistics for four scoping meetings; developed and maintained project mailing list; reviewed public scoping comments and prepared the Scoping Report; coordinated four sets of informational workshops and public hearings for the Draft EIR/EIS; supervised the distribution of comments on the Draft EIR/EIS to the project team; and coordinated the distribution of the Draft and Final EIR/EIS to affected public agencies, organizations, and citizens.

EIP Associates 1998 to 2001

- **Program EIR for the Divestiture of PG&E's Hydroelectric Generation Assets.** For the CPUC's EIR evaluating the Pacific Gas & Electric Company's (PG&E) proposal to divest their hydroelectric facilities in California, served as the land use technical analyst for two watershed areas, and the Task Manager for the Socioeconomics and Transportation sections of the EIR covering five watershed areas. PG&E owns and operates the largest private hydroelectric power system in the nation. Situated in the Sierra Nevada, Southern Cascade, and Coastal mountain ranges of California, this system is strung along 16 different river basins and annually generates approximately five percent of the power consumed each year in California. The proposed sale of assets also includes approximately 140,000 acres of land proposed for sale with the hydroelectric system. The EIR analyzes the range of operational changes that could occur under new ownership, including complex integrated models that analyze power generation and water management. The land use section of the EIR examines the implications of the change in ownership of lands and the potential for impacts due to development or potential changes in use. Contributed significantly to the extensive GIS analysis, which was conducted to determine the development suitability and potential intensity of development that might occur on the lands if sold. These results served as one of the primary bases for analysis of impacts associated with the sale of the hydroelectric assets.
- **Section 108 Loan Guarantee EA/FONSI for the Waterfront Development Project.** Served as the Manager and Principal Preparer for this EA/FONSI for the City of Huntington Beach Economic Development Department. Prepared NEPA documentation evaluating the impacts resulting from the use of HUD Section 108 Loan guarantee funds for the Waterfront Resort Expansion Project in accordance with The HUD NEPA Guidelines and Format 1 (Environmental Assessments at the Community Level). Tasks included: (1) Evaluation of activities that would be categorically excluded from NEPA based on an assessment of the NEPA Implementing Guidelines for HUD Projects; (2) Evaluation of proposed actions compliance with all applicable federal statutes, regulations, and policies; and (3) Preparation of an Environmental Assessment/Mitigated Finding of No Significant Impact (EA/FONSI) for proposed actions that are not categorically excluded. Proposed actions to be evaluated consisted mainly of infrastructure improvement projects, rehabilitation and/or development of affordable housing, provision of relocation assistance, facilitation of development and/or redevelopment plans, property acquisition, provision of open space, etc.
- **MTA Mid Cities/Westside Transit Corridor Study EIS/EIR.** Served as the EIS/EIR Deputy Project Manager (DPM) for this 3-phase (including prepared the Major Investment Study (MIS), the Environmental Impact Statement (EIS), and an evaluation of the urban design implications of transit interventions on selected routes) study intended to address current and long range traffic congestion in the central and westside areas of the Los Angeles, Basin. Three east/west corridors and a range of transit alternatives ranging including Rapid Bus, light rail, and heavy rail are being evaluated. In addition to her duties as DPM for this comprehensive joint EIS/EIR, Ms. Vahidi prepared the Environmental Justice Analysis (per Executive Order 12898), the Section 4(f) Parklands discussion, and the land use and socioeconomics sections of the EIS/EIR.
- **Wes Thompson Ranch Development Project EIR.** Served as the EIR Project Manager for this hillside residential development in the City of Santa Clarita. Issues of concern included seismic and air quality impacts associated with the excavation of 2 million cubic yards of soil, the project's non-compliance with the City's hillside ordinance for innovative design, and traffic generated by project-related population growth in the area. Four different site configuration alternatives were developed as part of the EIR analysis. Other issues of concern included sensitive biological resources, the potential for hydrological impacts due to disturbance of the hillside, and cultural resources.
- **City of Santa Monica Environmental Assessments.** As one of the City's qualified CEQA consultants managed several environmental assessment documents for housing, commercial, institutional, and mixed-use developments in compliance with CEQA, including:

- **Berkeley Manor Condominium EIR and Technical Reports**. This one-issue EIR originally was a CEQA Categorical Exemption per direction of the City. During preparation of the Categorical Exemption documentation, it was determined that project-generated traffic would have potentially significant impacts. As a result, a traffic technical report was prepared as the background document for and EIR. In addition, shade and shadow impacts were evaluated in a technical report to ensure that shading impacts from the proposed structure on surrounding uses would not be significant. A simple Excel model was developed for calculation of shade and shadow angles.
- **Seaview Court Condominiums IS/MND.** This comprehensive Initial Study/Mitigated Negative Declaration included six technical reports including traffic, cultural resources, parking survey, shade and shadow analysis, and a geotechnical assessment to evaluate the level of severity of this development in the waterfront area of Santa Monica. Major issues of concern were; parking and project-generated traffic on adjacent narrow residential streets; visual obstruction and shading impacts of the proposed structure; liquefaction and seismic impacts to adjacent properties as result of the project's excavation for a subterranean parking garage; and the potential impacts of the project to impact the integrity of a historic district and the historic Seaview Walkway to the beachfront.
- **Four-Story Hotel IS/MND.** A comprehensive Initial Study/Mitigated Negative Declaration was prepared for this four-story hotel adjacent to St. John's Hospital in Santa Monica. Major issues of concern included project-generated traffic on surrounding multi-family residential uses and emergency access to the hospital.
- **Santa Monica College Parking Structure B Replacement EIR.** This focused EIR addressed issues related to traffic and neighborhood land use impacts associated with the addition of a 3-story parking structure in the center of the SMC campus. Major issues of concern included the potential for project-generated traffic to cause congestion at the school's main entrance on Pico Boulevard, and the potential for overflow traffic to impact the Sunset Community of single-family homes adjacent to the school.
- **North Main Street Mixed-Use Development Project EIR.** This EIR included evaluation of impacts resulting from the development of a mixed-use development in Santa Monica's "Commercial Corridor" on Main Street, with ground-floor residences and boutique commercial uses. Major issues of concern included traffic and parking impacts to Main Street and surrounding residential land uses, shade and shadow impacts, and neighborhood impacts.

- **Specific Plans and Redevelopment Projects.** As the senior technical lead for land use, prepared the project description, alternatives screening and development, cumulative scenario, and land use analysis for:
  - **Cabrillo Plaza Specific Plan EIR in Santa Barbara.** This project consisted of a mixed-use commercial development on Santa Barbara's waterfront on Cabrillo Boulevard. On-site uses included an aquarium, specialty retail, restaurants, and office space.
  - **Culver City Redevelopment Plan and Merger EIR.** This programmatic EIR evaluated the impacts of the City's redevelopment of its redevelopment zones. A major land use survey and calculation of acreage of redevelopment lands was conducted as part of the EIR.
  - **Dana Point Headlands Specific Plan EIR.** This EIR evaluated the development of coastal bluff in the City with hotel, single- and multi-family residential, and commercial uses. Major issues of concern included ground disturbance as a result of excavation, impacts to terrestrial and wildlife biology, recreation impacts to beachgoers, and project-generated population inducement.
  - **Blocks 104/105 Redevelopment Project EIR in Huntington Beach (Project Manager).** This EIR evaluated the development of a supermarket, retail shops, and office space in the City's Waterfront Redevelopment Zone. Issues of concern evaluated included traffic, land use, and impacts to on-site historic structures.

HONORS AND AWARDS

- 2006 American Planning Association, Los Angeles Section Environmental Award for the Los Angeles Unified School District New School Construction Program, Program EIR
- 2004 Association of Environmental Professionals Statewide Best EIR Award for the Jefferson-Martin 230 kV Transmission Project EIR.
- 2001 Outstanding Performance Award from the State of California Energy Commission.

- 1992-93 recipient of the USC Merit ("Ides of March") Scholarship from the Southern California Association of Public Administrators (SCAPA).
- University of California, Irvine, School of Social Sciences. Graduated with Highest Honors in Political Science.

PROFESSIONAL ASSOCIATIONS

- American Planning Association (APA), Los Angeles Section Executive Board Member
- Association of Environmental Professionals (AEP)

DECLARATION OF
Testimony of Susanne Huerta

I**, Susanne Huerta,** declare as follows:

1. I am presently employed by Aspen Environmental Group, a contractor to the California Energy Commission, Siting, Transmission and Environmental Protection Division, as a **Environmental Planner/Land Use Technical Specialist**.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I prepared the staff testimony on **Land Use** for the **Calico Solar** project based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 22, 2010 Signed: Original signed by S. Huerta

At: Agoura Hills, California

SUSANNE R. HUERTA

Environmental Planner

ACADEMIC BACKGROUND

Master of Urban Planning, New York University, 2007
B.A., Geography, University of California, Los Angeles, 2004

PROFESSIONAL EXPERIENCE

Ms. Huerta is an Environmental Planner with five years of experience in environmental consulting, city planning, economic development and GIS analysis. She is currently conducting the technical analysis for agricultural and land use analyses for numerous solar and wind energy generating facilities. While attending graduate school, Ms. Huerta interned for a city planning consultant firm in New Jersey. Her city planning background includes experience in the preparation of master plans, the evaluation of site plans and subdivisions, and conducting land use surveys. At Aspen Environmental Group, Ms. Huerta conducts research and prepares environmental analyses in accordance with CEQA, NEPA, and various other environmental laws and regulations. Ms. Huerta's project-specific efforts are provided below.

Aspen Environmental Group — 2007 to present

- **Topaz Solar Farm Project Environmental Impact Report (EIR), San Luis Obispo County, CA, Project Assistant/Technical Specialist (2009-Present).**Ms. Huerta is currently preparing the Project Description and the technical analysis for the agriculture section for this 550 MW solar photovoltaic power plant on the Carrizo Plain of eastern San Luis Obispo County. The project includes solar arrays that would cover approximately 4,200 acres, as well as an electric substation and switching station.
- **California Valley Solar Ranch Project EIR, San Luis Obispo County, CA, Technical Specialist (2009-Present).** Ms. Huerta is currently preparing the technical analysis for the agricultural resources for this 250 MW solar photovoltaic power plant on the Carrizo Plain of eastern San Luis Obispo County. The project includes solar arrays that would cover nearly 2,000 acres, as well as an electric substation, a 2.5-mile transmission line, and expansion of a surface aggregate mine.
- **Pacific Wind Project EIR, Kern County, CA, Technical Specialist (2009-Present).** Ms. Huerta is currently preparing the technical analysis for land use and public services. The project is proposed to be located on approximately 8,300 acres of land with up to 250 wind turbines to produce up to 250 MW of wind energy.
- **Alcoa Dike Project Supplemental Environmental Assessment EA/EIR, US Army Corps of Engineers, Technical Specialist (2009-Present).** Ms. Huerta is a preparing the land use and visual analysis for the Supplemental EA/EIR Addendum under the NEPA/CEQA for the United States Army Corps of Engineers. A Supplemental EA/EIR Addendum is being performed to address design changes to the approved Alcoa Dike located in the Prado Basin, Riverside County.
- **Auxiliary Dike Project Supplemental Environmental Assessment (EA)/EIR, US Army Corps of Engineers, Technical Specialist (2009).** Ms. Huerta prepared the land use and visual analysis for the Supplemental EA/EIR Addendum under the NEPA/CEQA for the United States Army Corps of Engineers. A Supplemental EA/EIR Addendum is being performed to address design changes to the approved Auxiliary Dike located in the Prado Basin, Riverside County.

- **Baldwin Hills Community Standards District (CSD), City of Culver City, Technical Specialist (2009).** Technical Specialist for the review of a County of Los Angeles environmental document and preparation of an oil and gas drilling ordinance for the City of Culver City in Los Angeles County. Ms. Huerta reviewed the technical comments on the Baldwin Hills Community Standards District EIR prepared by the County of Los Angeles for the Inglewood Oil Field. The technical review included the evaluation of the County's proposed CSD (drilling ordinance), which the County revised based on public comments. The City used the review comments as part of their formal comments submitted on the County's EIR and CSD.
- **California River Parkways Trailhead Project Initial Study/Mitigated Negative Declaration (IS/MND), Ventura County Watershed Protection District, Technical Specialist, (2009).** The project would provide a new point of entry to the Ventura County-maintained Ojai Valley Trail and the Ventura River Trail, building on an existing trails network, and would include a new parking lot and crosswalk. Ms. Huerta performed the analyses for land use, agricultural and mineral resources, public services, and recreation resources.
- **TANC Transmission Project, Transmission Agency of Northern California, Staff Professional (2009).** Public scoping for 600 miles of proposed 230-kV and 500-kV transmission lines and associated infrastructure extending from eastern Lassen County south through the Sacramento Valley, and branching west to the Bay Area and east to Tuolumne County: Ms. Huerta assisted in the acquisition and processing of 6,600 scoping comments and information requests; responded via phone, email, and postal mail to public and agency inquiries throughout the twice extended, five-month scoping period; quantitatively evaluated scoping data; and authored sections of the scoping report.
- **Alta-Oak Creek Mojave Project EIR, Kern County, CA, Technical Specialist (2008-2009).** Ms. Huerta is prepared the technical analysis for land use, public services, population, and housing resources. The project is proposed to be located on approximately 11,000 acres of land with up to 350 wind turbines to produce up to 800 MW of wind energy. This would be the first project of the Alta Wind Energy Center which is designed to produce 1,500 MW of wind power in the Tehachapi Wind Resource Area of Kern County**.**
- **Santa Maria River Levee Repair Project, US Army Corps of Engineers, Technical Specialist (2008).** An Environmental Assessment (EA) is being performed for the corrective action to repair the design deficiency of the Santa Maria River Levee in order to avoid the potentially catastrophic consequences of a levee breach that would affect the population of the city of Santa Maria. Ms. Huerta has prepared technical analysis of potential land use and socioeconomic impacts for the EA under NEPA.
- **River Supply Conduit (RSC) Upper Reach Project EIR, Los Angeles and Burbank, CA, Technical Reviewer (2008).** Under Aspen's environmental services contract with the City of Los Angeles Department of Water and Power (LADWP), Ms. Huerta assisted in preparation of the potential impacts to recreational resources for this EIR. The RSC is a major transmission pipeline in the LADWP water distribution system. The existing RSC pipeline's purpose is to transport large amounts of water from the Los Angeles Reservoir Complex and local ground water wells to reservoirs and distribution facilities located in the central areas within of the City of Los Angeles. The LADWP proposed a new larger RSC pipeline to replace and realign the Upper and Lower Reaches of the existing RSC pipeline.
- **Tehachapi Renewable Transmission Project (TRTP) EIR/EIS, Kern, Los Angeles, and San Bernardino Counties, CA, Technical Specialist (2007-Present).** In preparation of a joint EIR/EIS for the CPUC and USDA Forest Service (Angeles National Forest), Ms. Huerta conducted research and analysis for impacts related to public services and utilities, and prepared the Cumulative Impact Scenario. In addition, she prepared the EIR/EIS Summary; and assisted in preparation of the Project

Description, Alternative Screening Report, Scoping Report, and the public comment period of the Draft EIR/EIS.

California Energy Commission (CEC)

In response to California's power shortage, Aspen has assisted the CEC in evaluating the environmental and engineering aspects of new power plant applications throughout the State under three separate contracts. Ms. Huerta has served as a Staff Professional for Land Use Staff Assessments since 2008. Her specific projects are listed below.

- Peak Workload Support for the Energy Facility Siting Program and the Energy Planning Program (Contract #700-05-002; 4/11/06 through 3/30/09)
  - **Carrizo Energy Solar Farm, San Luis Obispo County, CA.** Staff Professional for the Land Use Staff Assessment for Carrizo Energy, LLC's Application for Certification (AFC) to build the Carrizo Energy Solar Farm (CESF), which will consist of approximately 195 Compact Linear Fresnel Reflector (CLFR) solar concentrating lines, and associated steam drums, steam turbine generators (STGs), air-cooled condensers (ACCs), and infrastructure, producing up to a nominal 177 megawatts (MW) net. The CESF is located in an unincorporated area of eastern San Luis Obispo County, west of Simmler and northwest of California Valley, California. The CESF includes the solar farm site, a minimal offsite transmission system connection, and construction laydown area. The CESF site will encompass approximately 640 acres of fenced area in an area zoned for agricultural uses as specified in the San Luis Obispo County General Land Use Plan. Issues of concern include the impacts of the power plant on adjacent land uses and compliance with applicable local LORS.
  - **Willow Pass Generating Station, Pittsburg, CA.** Staff Professional for the Land Use Staff Assessment for a new, approximately 550-megawatt (MW) dry-cooled, natural gas-fired electric power facility proposed by Mirant. Development of Willow Pass would entail the construction of two generating units and ancillary systems including, adjacent electric and gas transmission lines, and water and wastewater pipelines.
  - **Stirling Energy Systems Solar One, San Bernardino County, CA.** Staff Professional for the Land Use Staff Assessment/BLM EIS for a nominal 850-megawatt (MW) Stirling engine project, with construction planned to begin late 2010. The primary equipment for the generating facility would include the approximately 30,000, 25-kilowatt solar dish Stirling systems (referred to as SunCatchers), their associated equipment and systems, and their support infrastructure. Major issues of concern include the conversion of approximately 8,230 acres of open space to industrial uses, compliance with BLM's CDCA Plan, etc.
  - **Stirling Energy Systems Solar Two, Imperial County, CA.** Staff Professional for the Land Use Staff Assessment/BLM EIS for a nominal 750-megawatt (MW) Stirling engine project, with construction planned to begin either late 2009 or early 2010. The primary equipment for the generating facility would include the approximately 30,000, 25-kilowatt solar dish Stirling systems (referred to as SunCatchers), their associated equipment and systems, and their support infrastructure. Major issues of concern include conversion of 6,500 acres of public recreation land used for OHV use and camping, and compliance with the BLM's CDCA plan.
  - **City of Palmdale Hybrid Power Plant Project, Palmdale, CA.** Staff Professional for the Land Use Staff Assessment for the Palmdale Hybrid Power Project (PHPP) proposed by the City of Palmdale. The PHPP consists of a hybrid of natural gas-fired combined-cycle generating equipment integrated with solar thermal generating equipment to be developed on an approximately 377-acre site in the northern portions of the City of Palmdale (City).
  - **Abengoa Mojave Solar One Project, San Bernardino County, CA.** Staff Professional for the Land Use Staff Assessment of a nominal 250 megawatt (MW) solar electric generating facility to be located near Harper Dry Lake in an unincorporated area of San Bernardino County. Issues of concern include the impacts associated with the conversión of 1,765 acres of open space lands.

PREVIOUS EXPERIENCE

Burgis Associates, Inc. — May 2006 to May 2007

Ms. Huerta worked as a consultant for city planning departments and private developers throughout northern New Jersey. Her primary projects were to draft a master plan reexamination report and an open space and recreation element of a master plan. Within these projects she evaluated existing socioeconomic conditions and land uses, and conducted an inventory of recreational facilities and open space. She also used ArcGIS to illustrate zoning recommendations and update land use and zoning maps. Other routine projects included the evaluation of site plan, subdivision and variance applications for compliance with local, State and federal regulations.

Brooklyn Economic Development Corporation — September to December 2005

Ms. Huerta conducted research and field surveys for community revitalization projects. She also participated in collaborative meetings with other community organizations.

ADDITIONAL TRAINING AND COURSES

- Successful CEQA Compliance (February 2009)
- CEQA Basics Workshop Series (November 2008)
- Advanced courses in ArcGIS
- Graduate courses in Environmental Impact Assessment and Environmental Policy

PROFESSIONAL AFFILIATIONS

- American Planning Association

DECLARATION OF
Erin Bright

I**, Erin Bright,** declare as follows:

1. I am presently employed by the California Energy Commission in the Engineering Office of the Energy Facilities Siting Division as a **Mechanical Engineer**.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I prepared the staff testimony on **Noise and Vibration** for the **Calico Solar Project** based on my independent analysis of the Application, supplements thereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issues addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 19, 2010 Signed: Original signed by E. Bright

At: Sacramento, California

Erin Bright
Mechanical Engineer

Experience Summary

One year of experience in the electric power generation field, including analysis of noise pollution, construction/licensing of electric generating power plants, and engineering and policy analysis of thermal power plant regulatory issues. One year of experience in the alternative energy field, including analysis of alternative fuel production and use.

Education

- University of California, Davis--Bachelor of Science, Mechanical Engineering and Materials Science
- University of California, Davis Extension Program--Renewable Energy Systems

Professional Experience

2007 to Present-- Mechanical Engineer, Energy Facilities Siting Division - California Energy Commission

Performed analysis of generating capacity, reliability, efficiency, noise, and the mechanical, civil/structural and geotechnical engineering aspects of power plant siting cases.

2006 to 2007--Energy Analyst, Fuels & Transportation Division - California Energy Commission

Performed analysis of use potential and environmental effects of emerging non-petroleum fuels, including compressed natural gas, biomass, hydrogen and electricity, in heavy and light duty transportation vehicles. Contributor to Energy Commission's alternative fuels plan.

DECLARATION OF
Kristin Ford

I, Kristin Ford declare as follows:

1. I am presently employed by the California Energy Commission in the Facilities Siting Office of the Energy Facilities Siting Division as a Planner I.

2. I prepared staff testimony for the Calico Solar Project based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

3. The information in the project description is correct, as the subject site will be owned by Stirling Energy Systems.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 3/25/10 Signed: Original signed by K. Ford

At: Sacramento, California

Kristin S. Ford

Experience

Environmental Planner November 2009 to Present
California Energy Commission, Sacramento, California

- Conduct CEQA-equivalent environmental review for proposed and existing power plants.
- Write analysis for Socioeconomics, Traffic, Visual Resources and Land Use sections for staff assessments.
- Provide expert witness testimony on Socioeconomics, Traffic, Visual Resources and Land Use issues at Energy Commission hearings.

Assistant Planner June 2006 to July 2009
City of Sacramento, Environmental Planning Services, Sacramento, California

- Evaluated, prepared and supervised the preparation of a variety of environmental documents under the California Environmental Quality Act (CEQA); analyzed data and made recommendations on complex planning matters involving issues related to land use, traffic, utilities, aesthetics, noise, energy, historic preservation, air quality and biological resources.
- Prepared, researched and reviewed Mitigation Monitoring Plans per CEQA, the California State & Federal Endangered Species Acts (CESA & FESA), the Clean Water Act (CWA), the Migratory Bird Treaty Act (MBTA) and the Natomas Basin Habitat Conservation Plan.
- Conducted biological resources site assessments for proposed development projects. Determined the need for preparation and/or review of specific studies, such as Wetland Delineations, Nesting Raptor Surveys, and Arborist Reports, to identify resources and provide mitigation measures.
- Coordinated the release of the City of Sacramento's 2030 General Plan Draft/Final Environmental Impact Report between various City departments, the Planning Commission, City Council and the consultant team.

Environmental Coordinator August 2005 to June 2006
Nella Oil Company, Auburn, California

- Coordinated company-wide environmental regulatory compliance activities, including:
  - site investigations;
  - underground fuel-storage tank environmental compliance recommendations and subsequent tank upgrades; and
  - hazardous waste removal.
- Maintained and managed Air Quality Management District and Environmental Health Department permits for 60+ gas stations.

Student Assistant March 2005 to August 2005
California Energy Commission, Sacramento, California

- Conducted research and provided technical writing support to Biology and Water Departments for the annual Energy Policy Report impact analyses.
- Maintained and managed compliance files on power plant facilities.

Student Assistant June 2004 to March 2005
Central Valley Regional Water Quality Control Board, Sacramento, California

- Supported National Pollutant Discharge Elimination System (NPDES) staff by:
  - maintaining waste water treatment plant discharge self-monitoring reports and case files; and
  - analyzed (Amador, Sutter, Placer and Yolo county) wastewater treatment plant monthly monitoring reports for possible permit violations.

Education

2005 Bachelor of Arts, Environmental Studies, *California State University, Sacramento*
2001 Associate of Arts, Liberal Studies, *Allan Hancock College, Santa Maria, California*

DECLARATION OF
Dr. Obed Odoemelam

I**, Obed Odoemelam** declare as follows:

1. I am presently employed by the California Energy Commission in the **Environmental Protection Office** of the Systems Assessments and Facilities Siting as a **Staff Toxicologist**.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on **Transmission Line Safety and Nuisance**, for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 25,2010 Signed: Orignal Signed by O. Odoemelam

At: Sacramento, California

RESUME

DR. OBED ODOEMELAM

EDUCATION:

1979-1981 University of California, Davis, California. Ph.D., Ecotoxicology

1976-1978 University of Wisconsin, Eau Claire, Wisconsin. M.S., Biology.

1972-1976 University of Wisconsin, Eau Claire, Wisconsin. B.S., Biology

EXPERIENCE:

1989
The Present: California Energy Commission. Staff Toxicologist.

Responsible for the technical oversight of staffs from all Divisions in the Commission as well as outside consultants or University researchers who manage or conduct multi-disciplinary research in support of Commission programs. Research is in the following program areas: Energy conservation-related indoor pollution, power plant-related outdoor pollution, power plant-related waste management, alternative fuels-related health effects, waste water treatment, and the health effects of electromagnetic fields. Serve as scientific adviser to Commissioners and Commission staff on issues related to energy conservation. Serve on statewide advisory panels on issues related to multiple chemical sensitivity, ventilation standards, electromagnetic field regulation, health risk assessment, and outdoor pollution control technology. Testify as an expert witness at Commission hearings and before the California legislature on health issues related to energy development and conservation. Review research proposals and findings for policy implications, interact with federal and state agencies and industry on the establishment of exposure limits for environmental pollutants, and prepare reports for publication.

1985-1989 California Energy Commission.

Responsible for assessing the potential impacts of criteria and noncriteria pollutants and hazardous wastes associated with the construction, operation and decommissioning of specific power plant projects. Testified before the Commission in the power plant certification process, and interacted with federal and state agencies on the establishment of environmental limits for air and water pollutants.

1983-1985 California Department of Food and Agriculture.

Environmental Health Specialist.

Evaluated pesticide registration data regarding the health and environmental effects of agricultural chemicals. Prepared reports for public information in connection with the eradication of specific agricultural pests in California.

DECLARATION OF
William D. Kanemoto

I**, Wiliam Kanemoto,** declare as follows:

1. I am currently under contract with Aspen Environmental Group a Contractor to the California Energy Commission, Systems Assessment and Facilities Siting Division. I am serving as a Visual Resource Specialist to provide Peak Workload Support for the Energy Facility Siting Program and for the Energy Planning Program.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I assisted in the preparation of the staff testimony on **Visual Resources** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated:_____ Signed: Original Signed by W. Kanemoto

At: Oakland, California

William Kanemoto

Visual Resource/Aesthetics Analyst

Academic Background:

M. Landscape Architecture, University of Michigan, Ann Arbor, 1982
B.A. Liberal Arts (Honors), University of California, Santa Cruz, 1973

Professional Experience:

Principal
William Kanemoto & Associates, Oakland, California, 1993 - Present

William Kanemoto is Principal of William Kanemoto & Associates, an environmental consulting practice specializing in visual analysis and computer visualization in the context of environmental review. In this capacity he has served as principal investigator for visual analysis and simulation on a wide range of major infrastructure and development projects, including the High Desert Power Project AFC, Port of Oakland Expansion EIS, Route 4 East/Pittsburg BART EIS, FMC Substation and Transmission Line PEA, and numerous other infrastructure and transportation projects. Mr. Kanemoto received recognition from the California Association of Environmental Professionals for visual analysis, computer simulation, animation, and video production for the Stanford Sand Hill Road Projects EIR, prepared by EIP Associates and judged 'Best State-Wide EIR of 1997'.

Associate Director
Environmental Simulation Laboratory,
Institute of Urban and Regional Development,
Center for Environmental Design Research
University of California, Berkeley, 1994 - 2000

Instructed graduate students in the College of Environmental Design, U.C. Berkeley, served as consultant on various major planning projects in the San Francisco Bay Area, and conducted design collaborations with counterparts at Keio University and ARK CyberUniversity in Tokyo, Japan via the Internet.

Principal Investigator/Project Manager
Dames & Moore, San Francisco/Oakland, California, 1988-1992

Served as principal investigator of numerous visual analyses of major infrastructure projects throughout the U.S., in Europe, and in Asia. Gained extensive familiarity with the application of a wide range of professionally accepted visual assessment techniques in the context of CEQA, NEPA, and related regulatory requirements of the CPUC, CEC, FERC, DOT, U.S. Forest Service, BLM, and other agencies.

Project Manager
LSA Associates, Pt. Richmond, California, 1987-1988

Project manager and planner on environmental impact reports for various residential and commercial development projects in northern California.

Environmental Planner
Holton Associates, Berkeley, California, 1984-1987

Preparation of various resource and regulatory studies including EIRs, FERC Exhibit E, Section 404 alternative analyses, riparian restoration studies, and cumulative impact methodology studies for EPRI and Sierra County, CA.

DECLARATION OF
Alan Lindsley

I**, Alan Lindsley,** declare as follows:

1. I am currently under contract with Aspen Environmental Group to provide environmental technical assistance to the California Energy Commission. Under Contract No. 700-08-001 I am serving as an Illuminating Engineer to provide Peak Workload Support for the Energy Facility Siting Program and for the Energy Planning Program.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I assisted in the preparation of the staff testimony on **Visual Resources** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated:_____ Signed: Original Signed by A. Lindsley

At: San Francisco, California

Alan Lawrence Lindsley, AIA, IESNA, LEED GA

Alan Lindsley, Principal and Founder of Lindsley Architectural Lighting, is noted for his creativity, depth of knowledge, strategic capabilities and commitment to green design. He has over thirty years of extensive project management experience in lighting design, interior architecture and historic preservation. As a result, he has the unique ability to fully understand and integrate lighting design with architecture. His design solutions integrate the creative use of lighting design products as well as custom fixtures that he creates for the client. The quality of his projects are frequently recognized by clients and peers within the industry. Numerous IESNA Section awards and AIA awards have been awarded for his project work.

As a hands on designer, he is completely involved in the design, technical evaluation, project coordination and implementation of each project. He has strong capabilities in delivering creatively designed, energy efficient and sustainable projects for corporate, institutional and governmental clients. Working with building departments throughout the United States, he has developed a strong base of knowledge in resolving complicated energy and building code issues. He is well-experienced in effectively directing the efforts of large multi-disciplinary teams to provide effective budget and scheduling controls.

Alan's commitment to energy efficiency and sustainable design spans several decades. His approach incorporates daylighting, use of high efficacy light sources, lighting control systems, and the intelligent application of light and darkness to highlight architectural features and address the needs of the people who inhabit or use the space. He has been actively involved in the dark sky movement to reduce light pollution as well as the American Institute of Architect's 2030 Initiative to produce a carbon neutral building. Alan is a LEED (Leadership in Energy and Environmental Design) Green Associate and member of the US Green Building Council.

Prior to starting his firm, Alan was Vice President at Brereton Architects and an Associate at Gensler and Associates. Alan received his Bachelors of Environmental Design/Architecture from University of Colorado at Boulder. He is a licensed architect (AIA) in California as well as several other states and holds a National Council of Architectural Registration Board certificate.

DECLARATION OF
James Earl Jewell

I**, James Earl Jewell,** declare as follows:

1. I am currently under contract with Aspen Environmental Group to provide environmental technical assistance to the California Energy Commission. Under Contract No. 700-08-001 I am serving as an Illuminating Engineer to provide Peak Workload Support for the Energy Facility Siting Program and for the Energy Planning Program.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I assisted in the preparation of the staff testimony on **Visual Resources** for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated:_____ Signed:_____

At: San Francisco, California

JAMES EARL JEWELL, LC, ATF, IES, CIES (Hon), SAH

EDUCATION:

BA, College of the Pacific
MFA, School of Drama, Yale University

EMPLOYMENT:

1957-67, Engineering Division, Holzmueller Corporation
1967-69, Theatre Consulting Service, Bolt, Beranek & Newman
1969-87, Lighting Services Administrator, Pacific Gas & Electric Company
1987- present, Consultant in Lighting
Since 1993 in association with Alan Lindsley, AIA, IES

PROFESSIONAL ACTIVITIES:

Illuminating Engineering Society
President – 1984-85
Vice President – 1983-84
Director – 1979-86
Office Lighting Committee – 1976 - present, Chairman, 1978-80
Roadway Lighting Committee – 1974 – present, Chairman, 1990-92
Regional Energy Committee Chairman – 1974-76, 1978-84
Energy Advisory Committee – 1973-75
Technical Missions – China – 1984, 1987, 1988

European Lighting Congress: Strasbourg, 1969; Florence, 1977; Granada, 1981; Lausanne, 1985; Budapest, 1989; Edinburgh, 1993; Berlin, 2001

Pacific Basin Lighting Congress: Chairman, Shanghai, 1989; Bangkok, 1993; Nagoya, 1997; Organizing Committee, Delhi, 2002; Cairns, 2005; Bangkok, 2009

Edison Electric Institute: Street Lighting Committee – 1971-87, Chairman 1979-81

International Commission on Illumination:
Board of Administration – 1983-87, 1987-91
Division Four (Lighting for Transport)
Technical Committee 4.34 -- 1980-95
Technical Committee 4.25 -- 1992-99

Professional Light Designers Convention: London, 2007; Berlin, 2009

EXPERT WITNESS – Admitted as an expert witness in the Superior Courts of Amador, Contra Costa, and San Francisco Counties.

AWARDS AND HONOURS:

IES Regional Technical Award – 1985
IES Distinguished Service Award – 1986
College of Fellows of the American Theatre --1988
Honourary Member, China IES – 1989
CIE Distinguished Service Award – 1991
IES Louis B. Marks Award – 1993

CERTIFICATION:

LC – Granted in 1990 by the National Council on the Qualification of Lighting Professionals

RELEVENT WORK EXPERIENCE:

With PG&E appeared before CEC Committee and Staff on lighting issues with respect to the siting and licensing of Geysers steam power plants.

On behalf of PG&E and the IES appeared before the Simonson Committee to consult on the development of the lighting portions of Title 24.

On behalf of PG&E and the IES appeared before the CEC on numerous occasions to support the development of fluorescent lamp promotional programs and to assist in developing rigorous lighting ballast standards for California and on other lighting energy management issues.

While at PG&E supported and oversaw funding for projects on daylight following and electronic ballasts. Projects supported by both the DOE and CEC.

In practice as a lighting consultant worked with private clients and jurisdictions on matters concerned with light trespass and "intrusive" lighting.

JEJewell
19 February 2010

DECLARATION OF
Ellen Townsend-Hough

I, **Ellen Townsend-Hough** declare as follows:

1. I am presently employed by the California Energy Commission in the Environmental Siting Office of the Energy Facilities Siting Division as an Associate Mechanical Engineer.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on **Waste Management** for the **Calico Solar** project based on my independent analysis of the Application for Certification and supplements thereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 22,2010 Signed: Original signed by E. Townsend-Hough

At: Sacramento, California

Ellen Townsend-Hough

SUMMARY

I am a chemical engineer with over 20 years of experience. My professional career has afforded me many unique growth and development opportunities. Working knowledge of the California Environmental Quality Act. Strength in analyzing and performing complex engineering analyses. Also worked as a policy advisor to a decision-maker for three years.

PROFESSIONAL EXPERIENCE

Writing

- Write letters, memos, negative declarations, environmental impact reports that require technical evaluation of mechanical engineering and environmental aspects of pollution control systems, environmental impacts, public health issues and worker safety.

Technical Analysis and Presentation

- Performs mechanical engineering analysis of designs for complex mechanical engineering analysis of designs for systems such as combustion chambers and steam boilers, turbine generators, heat transfer systems, air quality abatement systems, cooling water tower systems, pumps and control systems

- Review and process compliance submittals in accordance with the California Environmental Quality Act, the Warren Alquist Act, the Federal Clean Air Act and the California and Federal Occupational Health and Safety Acts to assure compliance of projects

- Provides licensing recommendations and function as an expert witness in regulatory hearings.

- Provide public health impact analysis to assess the potential for impacts associated with project related air toxic/non-criteria pollutant emissions.

- Evaluate the potential of public exposure to pollutant emissions during routine operation and during incidents due to accidents or control equipment failure

- Provide an engineering analysis examining the likelihood of compliance with the design criteria for power plants and also examine site specific potential significant adverse environmental impacts

Technical Skills

- Establish mitigation that reduces the potential for human exposure to levels which would not result in significant health impact or health risk in any segment of the exposed population.

- Assist with on-site audits and inspection to assure compliance with Commission decisions.

- Review and evaluate the pollution control technology applied to thermal power plants and other industrial energy conversion technologies.

- Work with the following software applications: WORD, Excel, and PowerPoint.

Policy Advisor

- Provided policy, administrative and technical advice to the Commissioner Robert Pernell. My work with the Commissioner focused on the policy and environmental issues related to the Commission's power plant licensing, research and development and export programs.

- Track and provide research on varied California Energy Commission (CEC) programs. Prepare analysis of economic, environmental and public health impacts of programs, proposals and other Commission business items.

- Represent Commissioner's position in policy arenas and power plant siting discussions.

- Write and review comments articulating commission positions before other regulatory bodies including Air Resources Board, California Public Utilities Commission, and the Coastal Commission.

- Wrote speeches for the Commissioner's presentations.

EMPLOYMENT HISTORY

2002-Present	Associate Mechanical Engineer	CEC Sacramento CA
1999-2002	Advisor to Commissioner	CEC Sacramento CA
1989-1999	Associate Mechanical Engineer	CEC Sacramento CA
1992-1993	Managing Partner	EnvironNet Sacramento CA
1988-1989	Sales Engineering Representative	Honeywell Inc Commerce CA
`1987-1988	Chemical Engineer	Groundwater Technology Torrance CA
1985-1986	Technical Marketing Engineer	Personal Computer Engineers Los Angeles CA
1985-1985	Energy Systems Engineer	Southern California Gas Company Anaheim CA
1980-1985	Design and Cogeneration Engineer	Southern California Edison Rosemead CA
1975-1980	Student Chemical Engineer	Gulf Oil Company Pittsburgh PA

EDUCATION

Bachelor of Science, Chemical Engineering
Drexel University, Philadelphia Pennsylvania

Continuing Education

Hazardous Material Management Certificate, University California Davis
Urban Redevelopment and Environmental Law, University of California Berkley
Analytical Skills, California Department of Personnel Administration (DPA) Training Center
Legislative Process/Bill Analysis, DPA Training Center
Federally Certified Environmental Justice Trainer

References furnished upon request.

DECLARATION OF
SHAHAB KHOSHMASHRAB

I**, SHAHAB KHOSHMASHRAB**, declare as follows:

1. I am presently employed by the California Energy Commission in the **ENGINEERING OFFICE** of the Facilities Siting Division as a **MECHANICAL ENGINEER**.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I participated in the preparation of the staff testimony on **Facility Design/Power Plant Efficiency** and **Power Plant Reliability** for the **Calico Solar Project** based on my independent analysis of the Application for Certification, Transmission System Engineering Appendix A, and supplements thereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issues addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: _____ Signed: Original signed by S. Khoshmashrab

At: Sacramento, California

Shahab Khoshmashrab
Mechanical Engineer

Experience Summary

Nine years experience in the Mechanical, Civil, Structural, and Manufacturing Engineering fields involving engineering and manufacturing of various mechanical components and building structures. This experience includes QA/QC, construction/licensing of electric generating power plants, analysis of noise pollution, and engineering and policy analysis of thermal power plant regulatory issues.

Education

- California State University, Sacramento-- Bachelor of Science, Mechanical Engineering
- Registered Professional Engineer (Mechanical), California

Professional Experience

2001-2004--Mechanical Engineer, Systems Assessment and Facilities Siting– California Energy Commission

Performed analysis of generating capacity, reliability, efficiency, noise and vibration, and the mechanical, civil/structural and geotechnical engineering aspects of power plant siting cases.

1998-2001--Structural Engineer – Rankin & Rankin

Engineered concrete foundations, structural steel and sheet metal of various building structures including energy related structures such as fuel islands. Performed energy analysis/calculations of such structures and produced structural engineering detail drawings.

1995-1998--Manufacturing Engineer – Carpenter Advanced Technologies

Managed manufacturing projects of various mechanical components used in high tech medical and engineering equipment. Directed fabrication and inspection of first articles. Wrote and implemented QA/QC procedures and occupational safety procedures. Conducted developmental research of the most advanced manufacturing machines and processes including writing of formal reports. Developed project cost analysis. Developed/improved manufacturing processes.

DECLARATION OF

Sudath A. Edirisuriya

I, **Sudath A. Edirisuriya** declare as follows:

1. I am presently employed by the California Energy Commission in the Facilities Siting, Transmission, and Environmental Protection Division as a **Associate Electrical Engineer**.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on **Transmission Systems Engineering** for the Calico Solar Project based on my independent analysis of the Application for Certification and supplements thereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated:_____ Signed: Original Signed by S. Edirisuriya

At: Sacramento, California

Sudath A. Edirisuriya
1916 Ackleton Way
Roseville CA 95661 Phone 916-654-4851

EDUCATION:

Bachelor of Science in Electrical Engineering at California State University Fullerton

ATTAINMENTS:

Member of the Professional Engineers in California Government
Vice President Electrical Engineering Society-California State University Fullerton.

EXPERIENCE:

November-2001 to Present: - Associate Electrical Engineer, System Assessment and Facilities Siting Division, California Energy Commission.
Working in the Transmission System Engineering unit on licensing generation projects. Work involves evaluating generation interconnection studies (SIS and FS), their reliability and environmental impacts on transmission system, preparing staff assessment reports, presenting testimony. Perform reliability studies and coordinating data and technical activities with utilities, California ISO and other agencies. Conduct and perform planning studies and contingency analysis including power flow, short-circuit, transient, and post-transient analysis to maintain reliable operation of the power system. Understanding of regulatory and reliability guidelines, WECC and NERC planning and operation criteria, CPUC and FERC requirements. Review technical analyses for WECC/CA ISO/PTO transmission systems and proposed system additions; and provide support for regulatory filings.

June-1998 to November-2001: - Project Electrical Engineer, Design Electrical Engineering Section, Department of Transportation, California.
Electrical Engineering knowledge and skills in the design, construction and maintenance of California state work projects involving all the public work areas; contract administration, construction management, plan checking, field engineering and provide liaison with consultants, developers, and contractors. Plan review in facility constructions, highway lighting, sign lighting, rest area lighting, preparation of project reports, cooperative agreements, review plans for compliance of construction and design guide lines for national electrical code, standards and ordinance. Review process included breaker relay coordination, detail wiring diagrams, layout details, service coordination, load, conductor sizes, derated ampacity, voltage drop calculations, harmonic and flicker determination.

June-1993 to May-1998:- Substation Electrical Engineer, City of Anaheim, California.
Performed protective relay system application, design and setting determination in Transmission & Distribution Substation. Understanding of principles of selective coordination system protection and controls for Electric Utility Equipment. Understanding of Power theory and Analysis of symmetrical components. Ability to review engineering plans, specifications, estimates and computation for Electrical

DECLARATION OF
Mark Hesters

I, Mark Hesters, declare as follows:

1. I am presently employed by the California Energy Commission in the Siting, Transmission and Environmental Protection Division, as a Senior Electrical Engineer.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I prepared the staff testimony on the **Transmission System Engineering** for the **Calico Solar** project based on my independent analysis of the Application for Certification and supplements thereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue(s) addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: _____ Signed: Original signed by M. Hesters

At: Sacramento, California

Mark Hesters
Associate Electrical Engineer

Mark Hesters has fourteen years of experience in electric power regulation. He worked in the Engineering Office of the California Energy Commission's Energy Facilities Siting & Environmental Protection Division since 1998 providing analysis of California transmission systems and testimony on transmission systems in several Commission power plant certification processes. Prior to that Mark worked in the CEC's Electricity Analysis Office providing lead analysis on Southern California Edison resource issues and modeling support for all areas of California. He holds a B.S. degree from the University of California at Davis in Environmental Policy Analysis and Planning.

DECLARATION OF
MARY DYAS

I**, MARY DYAS** declare as follows:

1. I am presently employed by the California Energy Commission in the **SITING AND COMPLIANCE OFFICE** of the Siting Transmission and Environmental Protection Division as a **COMLPIANCE PROJECT MANAGER**.

2. A copy of my professional qualifications and experience is attached hereto and incorporated by reference herein.

3. I helped prepare the staff testimony on **General Conditions**, for the **Calico Solar Project** based on my independent analysis of the Application for Certification and supplements hereto, data from reliable documents and sources, and my professional experience and knowledge.

4. It is my professional opinion that the prepared testimony is valid and accurate with respect to the issue addressed therein.

5. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 23, 2010 Signed: Original Signed by M. Dyas

At: Sacramento, California

MARY DYAS

CALIFORNIA ENERGY COMMISSION – COMPLIANCE PROJECT MANAGER

PROFESSIONAL EXPERIENCE

Planner II/III – Energy Facilities Compliance Project Manager *05/01/2008 to Present*
Siting Unit / Siting and Compliance Office, California Energy Commission, Sacramento, California

Compliance Project Manager—Provide oversight of energy facility construction and operation activities to ensure compliance with conditions of certification. Function as team leader for all compliance monitoring activities, processing of post-certification amendments, complaints, and facility closures.

Currently acting as working team leader on projects filed with the Energy Commission including renewable energy projects (SES Solar One and Solar Two), transmission line projects (Blythe Transmission Line), and natural gas-fired energy projects (Russell City Energy Center) in the licensing, construction and operational phases of each project.

Planner I/II – Energy Facilities Siting Project Manager *01/18/2006 to 04/30/2008*
Siting Unit / Siting and Compliance Office, California Energy Commission, Sacramento, California

Siting Project Manager – Provide day-to-day management of complex and controversial energy facility siting projects and renewable solar projects, including the Carrizo Energy Solar Farm Project, Bullard Energy Center, El Centro Unit 3 Repower Project and Chevron Replacement Project. Planning, organizing and directing the work of an interdisciplinary environmental and engineering staff team engaged in the review of complex or controversial energy facility siting Applications for Certification.

Energy Analyst / Associate Energy Specialist – LNG Research *09/27/2002 to 01/17/2006*
Natural Gas Office / Transportation Division, California Energy Commission, Sacramento, California

Coordinating and assisting with the facilitation of monthly Interagency LNG Working Group meetings involving cooperative federal, state, and local agencies; assisting with report writing conducting LNG facility assessments; Organizing/facilitating public workshops and preparing status reports on LNG facility development for use by Commissioners and Governor's Office, as well as reviewing and analyzing LNG-related legislative bills in California; Creating and maintaining the Commission LNG webpage, researching and preparing numerous LNG fact sheets for public education, and gathering information on new technology, tracking new LNG projects, and LNG market information.

Office Technician / Energy Analyst - Assistant Siting Project Manager *06/27/2000 to 09/27/2002*
Siting Unit / Siting and Compliance Office, California Energy Commission, Sacramento, CA

Assisting energy facility project managers with organization of and conducting workshops and public meetings between staff and power plant developers, other governmental agencies, private organizations, and the public. Also assisting with the reviewing, evaluating and editing of project correspondence, reports, and testimony as well as assisting project secretaries, and Office Managers as needed. Also performed all the same duties in relation to the Emergency Power Plant Permitting 21-day, 4-month, 6-month and 12-month projects.

Office Technician / Energy Analyst - Assistant Siting Project Manager *06/27/2000 to 09/27/2002*
Siting Unit / Siting and Compliance Office, California Energy Commission, Sacramento, CA

Managing the Siting Peak Workload Contract, including the preparation of hundreds of work authorizations, invoices, and general coordination of work between technical staff and contractor and preparing associated budget information for office managers and executive office.

EDUCATION

Bachelor of Science degree in Biological Sciences *California State University, Sacramento ~ 1995*