CALIFORNIA ENERGY COMMISSION
APPLICATION FOR CERTIFICATION
PURSUANT TO THE 21-DAY EMERGENCY
PERMITTING PROCESS

1.0 PROJECT DESCRIPTION

The Applicant, Wildflower Energy LP, proposes to construct a simple cycle peaking electric generation facility consisting of three GE LM6000 Enhanced Sprint gas turbine engines. The Project is called the Indigo Energy Facility and will be located at 19th Avenue east of North Indian Avenue and north of Interstate 10 (I-10), City of Palm Springs, Riverside County, CA

1.1 Project Owner/Operator (Name, Address, Phone)

Wildflower Energy LP
Two Houston Center,
909 Fannin, Suite 2222,
Houston Texas 77010
(713) 374 – 3900
(713) 374 – 3901 (fax)

1.2 Overview of Power Plant and Linear Facilities

The Indigo Energy Facility ("Indigo") is a nominally rated 135 Megawatt (MW) power plant that will utilize three natural gas-fired combustion turbine generators equipped with state of the art air pollution control features. GE LM6000 aeroderivative combustion turbine-generators have been installed in hundreds of facilities throughout the world. The facility will be configured in a simple-cycle mode. The combustion inlet air will be filtered and cooled via inlet fogging systems to increase efficiency and output. The lube oil system will be cooled by a fin fan cooler and the generators will be air cooled. The project will include a staging and maintenance area located immediately adjacent to the Indigo plant site.

To reduce nitrogen oxide (NOx) emissions from Indigo, selective catalytic reduction (SCR) technology will be used. SCR, considered a best available control technology (BACT), is a reliable and proven technology to reduce NOx emissions. Injecting ammonia vapor (NH3) into the flue gases, which then pass through a catalyst material, reduces the NOx emissions. The resulting chemical reaction reduces the NOx to

harmless nitrogen and water. Aqueous ammonia will be transported five to seven times per month to the site via a tanker truck, regulated by the California Department of Transportation (Caltrans). Aqueous ammonia will be stored in one 10,000-gallon storage tank onsite.

A secondary steel containment will be provided designed to retain a minimum of 110% of the storage tank volume. Small ammonia flow control vaporization skids will be utilized to heat the ammonia and inject it into the SCR systems.

The size of the Indigo facility is compact and consists of modular components. With the exception of the three 105-foot stacks and turbine compressor vents, the Indigo facility components are less than 45-feet in height and will occupy approximately 10 acres.

The Indigo facility is located approximately 1,600 feet east of the existing Cal ISO Controlled Devers-Garnet 115kV transmission line that connects with California's electricity grid at the Devers Substation 115kV circuit. A new 65 to 70 foot wood pole, wish-bone construction, 115 kV circuit is anticipated to be constructed on the north side of 19th Avenue between the existing wood pole 115 kV circuit and the new utility substation-interconnection facility located towards the western end of the site property. The 115kV transmission line extension will also require the addition of a new wood pole structure inter-set at a junction point with the existing Devers-Garnet 115kV transmission line. The inter-set connection will provide the necessary physical connection to the 115kV circuit at Devers Substation.

The Southern California Gas Company (Gas Company) will provide natural gas service through a new 24-inch natural gas pipeline extension from one of the Gas Company's existing 2000 or 2001 30-inch main pipelines. The extension from the 30-inch pipeline will be north across Garnet Avenue, underneath Interstate 10, across 20th Avenue and then continue north for approximately 900 feet along an existing Gas Company public utility easement onto the west portion of the Indigo facility site. The project will utilize an estimated 1,500 mmbtu/hr of pipeline quality natural gas.

The proposed Indigo facility will obtain potable water via already existing Mission Springs Water District 12-inch water main that runs parallel to the project's south property line on the south side of the paved portion of the 19th Avenue right-of-way. To establish water service for the project, Mission Springs Water District will extend a new water line across the 19th Avenue right-of-way area onto the project site. The new water line will be less than 90 feet. It is estimated that the Indigo facility will consume

approximately 240-gpm water at peak usage. Prior to use by the facility, all potable water will be treated with off-site regenerated portable trailer mounted demineralizers.

Site storm drainage will be to the stormwater system. Plant drains will be routed to a separation sump, with provisions for oil collection by an oily water separator. Any oil sludge will be properly disposed of at an appropriate waste disposal or recycling facility. The plant is designed to have no other wastewater discharge.

The project will include a construction staging and maintenance area located immediately north of the plant site on the project parcel. The construction staging area will be used during the construction phase of the project for parking vehicles and the storage of materials and equipment.

1.3 Structure Dimensions (Size and Height), Plan and Profile

The size of the Indigo facility is compact and consists of modular components. With the exception of three 105-foot stacks and a turbine compressor vent, the Indigo facility components are less than 45-feet in height and will occupy approximately ten acres. See attached Attachment 1, The Indigo Energy Facility Site Plan and Attachment 2, Elevations Drawings.

1.4 Full Size Color Photo of the Site and Rendering of Proposed Facility if Available

Refer to Attachments 19 and 3.

1.5 Maximum Foundation Depth, Cut and Fill Quantities

The proposed equipment will be supported on reinforced concrete foundation mats at grade. The mat foundations will be approximately 3’-0” thick for the major equipment (CTG, SCR, etc.), and approximately 2’-0” thick for the ancillary equipment. Foundations will be designed to support the weight of the equipment, plus operating loads, in additional to the imposed loads due to wind or seismic.

The proposed project site will be graded to near flat within the equipment power island area. The site elevation will be determined based on the existing topography, and a balanced cut and fill program.

1.6 Conformance with California Building Code

The Indigo Facility will be designed and constructed in accordance with all applicable local, state and federal design standards commonly used in the design of peaking generation facilities. These standards will include specific criteria as it applies to the State of California and City of Palm Springs, and will encompass seismic design standards as they pertain to the Indigo Site.

1.7 Proposed Operation (Hours Per Year)

The Indigo facility is designed as a peaking unit, however, it will be permitted for 7,884 hours of operation, to allow for maximum flexibility, however, with the emissions evaluated accordingly.

1.8 Expected On-line Date

The Indigo facility is expected to be on-line and be ready for commercial operation on July 5, 2001. It is anticipated that construction will require approximately two to three months, provided that there are no delays in the gas and electric interconnection process. In the event of a delay in gas and electric interconnection of the facilities, it is considered that the construction period could be delayed up to seven months.

1.9 Proposed Duration of Operation (Years)

It is anticipate that the facilities project life is 50 years.

1.10 Identify Transmission Interconnection Facilities

The Indigo facility is located approximately 1,600 feet east of the existing Cal ISO Controlled Devers-Garnet 115kV transmission line which connects with California's electricity grid at the Devers Substation 115kV circuit. A new 115 kV transmission line consisting of 65 to 70 foot wood poles with wish-bone construction, will be constructed on the north side of 19th Avenue between the existing Devers-Garnet 115 kV transmission line and SCE's proposed interconnection facility which will be located on the southwestern portion of the Indigo property adjacent to 19th Avenue. The 115kV transmission line extension will also require the addition of a new wood pole structure inter-set at a junction point with the existing Devers-Garnet 115kV transmission line. The inter-set connection will provide the necessary physical connection to the 115kV circuit at Devers Substation.

1.11 Transmission Interconnection Application

Refer to Attachment 4.

1.12 "Down-stream" Transmission Facilities (If Known)

Refer to Attachment 5.

1.13 Fuel Interconnection Facilities

The Southern California Gas Company (Gas Company) will provide natural gas service through a new 24-inch natural gas pipeline extension from one of the Gas Company's existing 2000 or 2001 30-inch main pipelines. The extension from the 30-inch pipeline will be north across Garnet Avenue, underneath Interstate 10, across 20th Avenue and then continue north for approximately 900 feet along the already existing Gas Company public utility easement onto the west portion of the Indigo facility site. The project will utilize an estimated 1,500 mmbtu/hr of pipeline quality natural gas.

1.14 Fuel Interconnection Application

Refer to Attachment 6 for documents providing status of fuel interconnection request.

1.15 Water Requirements and Treatment

The Indigo facility will consume approximately 240-gpm water at peak usage to increase plant efficiency and reduce NOx emissions.

1.16 Water Interconnection Facilities (Supply/Discharge)

The proposed Indigo facility will obtain potable water via an already existing Mission Springs Water District 12-inch water main that runs parallel to the Project's south property line on the south side of the paved portion of the 19th Avenue right-of-way. To establish water service for the project, Mission Springs Water District will extend a new water line across the 19th Avenue right-of-way area onto the project site. The new water line will be less than 90 feet.

Site storm drainage will be to a storm water system. Plant drains will be routed to a separation sump, with provisions for oil collection by an oily water separator. Any oil sludge will be properly disposed of at an appropriate waste disposal or recycling facility.

1.17 Source and Quality of Water Supply

Indigo will obtain water from the Mission Springs Water District municipal system. Refer to Attachment 7 for water quality information.

1.18 Water Supply Agreement / Proof of Water Supply

Wildflower has met with the Mission Springs Water District requesting water supply service. Mission Springs subsequently tested their municipal system and has verbally confirmed the Water District's ability to serve the Indigo facility's water supply requirements. Mission Springs has prepared a written confirmation of ability to serve (refer to Attachment 8) and an estimate for cost of services and interconnection. Wildflower Energy LP expects to execute a Water Supply Agreement in time for interconnection of water supply services to support construction and operation.

2.0 SITE DESCRIPTION

2.1 Site Address (Street, City, County)

19th Avenue
City of Palm Springs,
Riverside County,
92258, CA

The project site is located at the north terminus of 19th Avenue; east of N. Indian Avenue; west of Karen Avenue; south of Dillon Road and north of Interstate 10 (I-10), City of Palm Springs, Riverside County, CA.

2.2 Assessor's Parcel Number

666-320-014 (Plant Site only).

2.3 Name and Addresses of all Property Owners Within 500 Feet of the Project Site or Related Facilities

Please refer to Attachment 9 for a map of adjacent parcels and list of property owners. For a list of all property owners within a 500 foot radius of the plant site and off-site linears refer to Attachment 18. An electronic mail merge format will be submitted to the CEC under separate cover.

2.4 Existing Site Use

The proposed plant site is currently vacant. The transmission line would be located on vacant land east of the plant site. The water line would be located on the project site which is currently vacant land and connect to an existing water main extension on 19th Avenue. The gas line would be located on an existing dirt road and proceed south of I-10 to an existing gas line near Garnet Street.

2.5 Existing Site Characteristics (Paved, Graded, etc.)

The proposed plant site is currently an unimproved lot. Disturbances on-site are scattered and include off-road vehicle tracks, human foot tracks, and areas where debris from human activities has been deposited.

2.6 Layout of Site (Include Plot Plan)

The plant will be constructed within a 10-acre site which includes three main power generation turbines, three SCR modules, three exhaust stacks, the control enclosure and a facility substation which includes three step up transformers and plant circuit breakers. A new 65 to 70 foot wood pole, wish-bone construction, 115 kV circuit is anticipated to be constructed on the north side of 19th Avenue between the existing wood pole 115 kV circuit and the new utility substation-interconnection facility located towards the western end of the site property. Refer to Attachment 1, the Indigo Site Plan.

2.7 Zoning and General Plan Designations of Site and Linear Facilities

General Plan Designation

Plant Site: Energy/Industrial (E/I)
Transmission Line: Energy/Industrial (E/I)
Water Line: Energy/Industrial (E/I)
Gas Line: Energy/Industrial (E/I) and Highway Commercial (HC)

Zoning Designation

Plant Site: General Manufacturing (M-2)
Transmission Line: General Manufacturing (M-2)

Water Line: General Manufacturing (M-2)

Gas Line: General Manufacturing (M-2) and Highway Commercial (HC)

2.8 Ownership of Site (Name, Address, Phone)

Wintec Energy, LTD

125 East Tahquitz Canyon Way, Suite 201

Palm Springs, CA 92262

(760) 323-9490

2.9 Status of Site Control

The project acquired site control upon signing a binding Agreement to Lease the property from Wintec Energy, LTD for 10 years, with options to extend the term of the lease for up to 30 years. A final agreement to either lease or purchase the property will be executed prior to the commencement of construction.

2.10 Equipment Laydown Area - Size and Location

The project will utilize an approximate one-acre staging area located north on the project site. Additionally, the project will utilize approximately 2,000 feet of off-site administrative and warehousing facilities located near the site. This area has not been selected.

3.0 CONSTRUCTION DESCRIPTION

3.1. Construction Schedule

It is anticipated that construction will require approximately four months, provided that there are no delays in the gas and electric interconnection process. In the event of a delay in gas and electric interconnection of the facilities, it is considered that the construction period could be delayed up to seven months.

3.2 Workforce Requirements (Peak, Average)

At the beginning of the project, the construction team will consist of approximately 80 workers. The team will grow to be approximately 200 workers over the first four weeks of the construction schedule. During the following two months, the construction team will remain approximately at 200 workers. In the peak construction month there will be

an estimated peak of 200 personnel for construction of the project. During the last two weeks of construction, the team will be reduced to 40. It is anticipated that most of the construction workers will not be expected to relocate. During plant operations, the plant site will be dispatched from a remote location. A crew of up to five employees will be dispatched to the site periodically during times of "peak" energy needs and for maintenance activities.

4.0 POWER PURCHASE CONTRACT (DWR, ISO, OTHER)

4.1 Status of Negotiations and Expected Signing Date

The facility is required to provide capacity and energy to the California ISO (CAISO) pursuant to a Summer Reliability Agreement (SRA) executed with the ISO on November 28, 2000. The SRA requires the plant to be on line for Summer 2001 and allows the CAISO to dispatch the Indigo facility from June to October for up to 500 hours for years 2001, 2002, and 2003.

5.0 AIR EMISSIONS

5.1 Nearest Monitoring Station (location, distance)

Meteorological data to support operation of the air emissions model were obtained from the SCAQMD for the Palm Springs air quality monitoring station, approximately 4.8 miles south of the proposed project site. For more detailed information please refer to the Permit to Construct Application for the Wildflower project Indigo Energy Facility submitted under separate cover.

5.2 Provide Complete Self Certification Air Permit Checklist

Refer to Attachment 10.

5.3 Provide Complete Air Permit Application

The Permit to Construct Application for the Wildflower project Indigo Energy Facility, submitted to the SCAQMD on February 23, 2001 and amended on March 7, 2001, is provided under a separate cover.

5.4 Status of Air Permit Application with Air District

The Permit to Construct Application for theWildflower Project Indigo Energy Facility was submitted to the South Coast Air Quality Management District (SCAQMD) on February 23, 2001. Wildflower will submit a revised application on Wednesday, March 7, 2001 to the SCAQMD.

5.5 Status of Offsets and/or Mitigation Fees, As Required

A comparison of the projected facility emissions versus SCAQMD thresholds indicates that the expected emissions of NO_x, CO, SO_2 and PM_{10} are high enough to trigger emission offsets, but ROG emissions will be below the threshold for this pollutant. Based on estimates detailed in the Permit to Construct Application for the Wildflower Project Indigo Energy Facility submitted under separate cover, the project will be required to acquire the following offsets:

NO_x:	603.42 lb/day
CO:	216.17 lb/day
SO_2:	118.97 lb/day
PM_{10}:	233.28 lb/day

Wildflower Energy LP is currently working with several emissions offset brokers to obtain the required NO_x credits. Due to the relative scarcity of PM_{10} ERCs presently available for purchase within the SCAQMD, the needed quantity of ERCs for this pollutant will be obtained using one or more of the following strategies:

- Utilize brokers to obtain the necessary PM_{10} credits;
- Utilize brokers to obtain SO_x ERCs to be used at the 2:1 ratio accepted by SCAQMD;
- Develop a mitigation project or projects with appropriate entities to create the required PM_{10} ERCs.

In addition, Wildflower Energy LP will investigate the possibility of purchasing credits to offset project emissions of all pollutants from the California Air Resources Board pursuant to Governor Davis' recent Executive Orders.

6.0 NOISE

6.1 Local Noise Requirements

Refer to Attachment 11 for the City of Palm Spring's Noise Requirements.

6.2 Nearest Sensitive Receptor (Type, Distance)

The nearest sensitive receptors are residences located 4,000 – 5,000 feet north of the site, located at Indian Avenue between 18th Avenue and Dillon Road. Commercial uses are located approximately 3,540 feet southeasterly of the site.

6.3 Project Noise Level at Nearest Property Line

Noise levels at the commercial and residential uses along Indian Ave are approximately between 40-43 dB and noise levels south of 19th Avenue are approximately 65 dB. These noise levels represent computed noise contours with standard noise control enclosures on the turbine generators and ancillary equipment.

6.4 Proposed Mitigation if Required

For protection of the industrial park to the south and compliance with City of Palm Springs nighttime noise standards at the distant residences, the applicant will include standard enclosures on the turbine generators and ancillary equipment.

7.0 HAZARDOUS MATERIALS

7.1 Type and Volume of Hazardous Materials On-Site

Hazardous material required and stored onsite for the project will be aqueous ammonia. The storage volume and purpose of the aqueous ammonia is described below.

Aqueous ammonia or ammonium hydroxide (NH_4OH) will be stored on site in one 10,000-gallon vertical tank built inside a secondary containment unit designed for 110% of the tank capacity. Aqueous ammonia will be used on site for emission control using a Selective Catalytic Reduction (SCR) unit. The SCR is an air pollution control system typically used for such applications.

SCR is a post-combustion flue gas control technology that removes NO_x from the flue gas after it has been generated in the combustion process. The SCR uses aqueous ammonia to react with NO_x in the exhaust gases and convert them into environmentally acceptable emissions. It is proposed that aqueous ammonia at a concentration of approximately 19.5 percent be used for the project. The on-site storage and handling of

aqueous ammonia is regulated under the California Accidental Release Program (CalARP) requirements (California Health and Safety Code (CH&SC) Section 2770.1).

In addition, the following would also be stored onsite:

- Lubrication oil: 500 gallons in a single container
- Turbine oil: 150 gallons in a single container
- Hydraulic oil: 40 gallons in a single container

7.2 Storage Facilities and Containment

Refer to Section 7.1.

8.0 BIOLOGICAL RESOURCES

8.1 Legally Protected Species and Their Habitat On-Site and Along Linear Facilities

The dominant plant community onsite is creosote scrub, which is dominated by creosote and burrobush. Disturbances on-site are scattered and include off-road vehicle tracks, human foot tracks, and areas where debris from human activities has been deposited. A Biological Assessment and supplemental report were prepared for the IEF project (February 2001) for this site by VHBC, Incorporated and URS Corporation (Refer to Attachment 12). The assessment concluded that the site does not currently contain, nor is it expected to support, any sensitive biological resources. The diversity of species will not be affected by the proposed project, nor will the project effect the movement of fish or any wildlife species.

8.2 Legally Protected Species and Their Habitat Adjacent to Site and Along Linear Facilities:

No signs of the desert tortoise were observed onsite. Habitat for the flat-tailed horned lizard is absent. Habitat for the Palm Springs ground squirrel and Palm Springs pocket mouse is present on-site; however, neither species was observed during the field surveys. The wildlife observed onsite include only common species such as jackrabbit, coyote desert iguana, and western whiptail lizard. No impacts to endangered, threatened, rare species or their habitats are anticipated.

Construction of the proposed gas line and transmission line is not expected to result in significant local or regional environmental impacts since the lines will be installed

adjacent to an existing dirt road. No sensitive species was observed near the gas and transmission line. Potential foraging habitat for some common species is expected to be eliminated by the construction; however, due to the size of the environmental effects and the disturbed nature of the area, impacts are considered to be less than significant.

8.3 Designated Critical Habitat On-Site or Adjacent (Wetlands, Vernal Pools, Riparian Habitat, Preserves)

There are no vernal pools, riparian habitats, or wetlands onsite. No impacts are anticipated.

8.4 Proposed Mitigation if Required

See 8.1. The applicant would pay $600 per acre to the City of Palm Springs as mitigation fees for the loss of desert lands.

9.0 LAND USE

9.1 Local Land Use Restrictions (Height, Use, Etc.)

The proposed project site and surrounding General Plan land use designation is Energy/Industrial (E/I). This designation is designed to provide for industrial areas which combine alternative energy development and limited industrial land uses in those areas which are suitable for both (City of Palm Springs, 1993). The land is zoned General Manufacturing (M-2). A change of zone would not be required. The project is consistent with the General Plan Land Use Designation (E/I) and Zoning designation (M-2) for the site. The applicant would comply with the requirements as specified in the City of Palm Springs Zoning Code Section 9217-1.00 “M-2” Manufacturing Zone District. The project would comply with all local land use requirements and ordinances.

9.2 Use of Adjacent Parcels

The project is bounded on the north and west by vacant property (with WECS 28 approximately ¼-mile to the west), on the south by an industrial park and on the east by WECS 67. Refer to Attachment 13 for a map of local land uses.

9.3 Ownership of Adjacent Parcels - Site and Linears

Refer to Attachment 9.

9.4 Demographics of Census Tract (If Known)

The following demographic information is for the City of Palm Springs. The City of Palm Springs had a total population of 42,226 in 1990. Twenty-two percent of Palm Spring's population are younger than the age of 21; 38% of the people are between the ages 22 and 49; 23% of the people are between the ages 50 and 69; and 17% of the people are over the age of 70. The median family income for the City in 1990 was $34,176 and approximately 12.7% of the total population was below the poverty level. The racial percentages of total population for Palm Springs are shown in the table below.

Race	Percentage of Population
White	82
Black	4. 5
Indian	0.7
Asian	3.7
Hispanic*	21
Other	9.1

Source: 1990 United States Census Bureau
* It should be noted that the Bureau of Census indicates that persons of Hispanic origin may identify with any of the minority population categories listed above, as well as with White and any other category, to capture undefined origins.

10.0 PUBLIC SERVICES

10.1 Ability to Serve letter from Fire District

Refer to Attachment 14.

10.2 Nearest Fire Station

The nearest fire station is located at 72895 Dillon Road, approximately one mile from the project site.

11.0 TRAFFIC AND TRANSPORTATION

11.1 Level of Service (LOS) Measurements on Surrounding Roads - A.M. and P.M. Peaks

Access to the site is provided by Interstate 10 (I-10) to Indian Avenue. In 1999, I-10 carried 60,000 average daily traffic trips between State Route 111 and Indian Avenue (Caltrans, 1999). Peak hour counts for this segment in 1999 were 5,500 (Caltrans, 1999).

Major access roads affected by the project include Indian Avenue. Indian Avenue has a capacity of 18,000, is handling 12,000 average daily trips (67% of capacity) south of I-10, and 13,400 (74% of capacity) north of I-10, and is operating at LOS C and LOS D, respectively (County of Riverside, 2000). A 24-hour traffic count performed in the winter of 1998 counted 11,159 vehicles on Indian Avenue south of Dillon Road. A similar count performed March 19, 1988 at the intersection of 19th Avenue and Indian Avenue identified 5,481 southbound and 6,401 northbound vehicles (11,882 vehicles total) along Indian Avenue, and 291 vehicles eastbound along 19th Avenue. There are no planned improvements to Indian Avenue in the near future (County of Riverside, 2000). Peak hour counts for Indian Avenue were not available at the time of the preparation of this application.

11.2 Traffic Control Plan - for Roads During Construction Period

In order to minimize impacts to traffic flow Wildflower Energy LP will develop and implement a standard traffic control plan consistent with the size and scope of the Indigo facilities construction activities. Some of these safety measures include:

- Utilize proper signs and traffic control measures in accordance with Caltrans and City requirements.
- Install crossing structures to avoid obstructing roads.
- Coordinate construction activities with appropriate City and County departments if closures of major roads are necessary during pipeline construction.
- Coordinate crossing of State highways with Caltrans in accordance with Caltrans regulations and permit requirements.
- Schedule traffic lane or road closures during off-peak hours whenever possible.

- Limit vehicular traffic to approved access roads, construction yards, and construction sites.

- Construct offsite pipelines in accordance with applicable State and local encroachment permit requirements. Cover trenches in roadways during non-work hours.

Wildflower will obtain the following permits prior to project construction:

- Transportation permits required by Caltrans to transport oversize, overweight, overheight, and overlength vehicles on State highways (in compliance with California Vehicle Code Section 35780; the Streets and Highways Code Sections 117 and 660-711; and 21 California Code of Regulations 1411.1 to 1411.6);

- Encroachment permits required from Caltrans for pipeline crossings of State highways; and

- Encroachment permits required by the City of Palm Springs and County of Riverside for pipeline crossings of County-maintained roadways.

- Compliance with California Vehicle Code Section 31300 et seq. regarding the transportation of hazardous materials.

11.3 Traffic Impact of Linear Facility Construction

Offsite pipeline constructions would occur along 19th Avenue for the water line and construction of the gas line would require boring under I-10. The Southern California Gas Company would be responsible for the construction and operation of the gas line in the vicinity of I-10. The Southern California Gas Company would obtain all necessary approvals from Caltrans for construction and operation of the gas line. Appropriate safety barriers would be installed as necessary during construction activities to reduce potential hazards to pedestrians, bicyclists, and motorists.

11.4 Equipment Transport Route

Access to the site is provided by I-10 to Indian Avenue to 19th Street.

11.5 Parking Requirements - Workforce and Equipment

Parking for construction personnel will be provided within the construction staging area located on the west side of the project site. Construction of the project will require the use and installation of heavy machinery and associated systems and structures. In addition to deliveries of heavy equipment, construction materials such as concrete, pipe, cables, and steel will be delivered to the site by truck. At this time, the types of vehicles and equipment to be used for project construction have not been finalized.

12.0 WATER RESOURCES

12.1 Wastewater Volume, Quality, Treatment

Site storm drainage will be to the stormwater system. Plant drains will be routed to a separation sump, with provisions for oil collection by an oily water separator. Any oil sludge will be properly disposed at an appropriate industrial dumpsite or recycling facility. The plant is designed to have no other wastewater discharge.

12.2 Status of Permits for Wastewater Discharge or Draft Permit (WDR/NPDES)

Erosion and sediment controls and other BMPs will be implemented for the construction, post-construction, and operations phases in accordance with the California NPDES General Permit for Storm Water Discharge Associated with Construction Activity, California NPDES General Permit for Storm Water Discharges Associated with Industrial Activities, and with other local laws and ordinances as applicable.

12.3 Draft Erosion Prevention and Sedimentation Control Plan or Mitigation Strategy

Draft Erosion Prevention and Sedimentation Control Plans are included on the grading plan, Attachment 15. More specific erosion prevention and sedimentation control plans are being completed for submittal to the building department.

12.4 Spill Prevention/Water Quality Protection Plans

The types and quantity of oil/oil products stored onsite are presented in section ----. Per 40 CFR 112.1 (d) (2) the site does not have above ground storage capacity for oil that exceeds 1,320 gallons and no single container has a capacity in excess of 660 gallons;

therefore, a Spill Prevention Control and Countermeasure Plan for the facility is not required.

The storage and handling of aqueous ammonia at the site will be covered under the California Accidental Release Program (CalARP) and the completed CalARP will be approved by the local agency, the city of Riverside Hazardous Materials Division prior to the introduction of the chemical on site.

The total area of the site is approximately 10 acres therefore a Storm water Pollution Prevention Plan (SWPPP) for construction activities will be in place prior to start of construction. The SWPPP will include description of Best Management Practices (BMPs) for storm water pollution prevention to be implemented at the site during th construction phase. These BMPs will include but not limited to culverts, berms, sandbags and other acceptable procedures for the prevention of stormwater pollution from onsite materials. The SWPPP will be submitted to the local Regional Water Quality Control Board (RWQCB) for approval.

The operating facility will require a SWPPP, and a Storm water Monitoring Plan. A Notice Of Intent (NOI) will be submitted to the RWQCB before the start of industrial activities per their requirements. This will be followed by the preparation of a SWPPP for the site. All chemicals/oils stored onsite will be in closed containers and will include secondary containment to prevent flow of chemicals and oils into the storm sewers. The SWPPP will contain the following elements.

Refer to Attachment 18 for a copy of the SPCC Plan.

13.0 CULTURAL RESOURCES

13.1 Map of Known Historic/Prehistoric Sites

There are no previously recorded cultural resource sites within the proposed Indigo Area of Potential Affect (APE); therefore, no map has been included.

13.2 Proposed Mitigation if Required

In the unlikely event that buried cultural materials or deposits are found during construction or related activities the applicant would implement the following:

All work in that vicinity should stop immediately until an assessment can be made of the finds by a qualified archaeologist. Should human remains be encountered, work in the vicinity must halt. The Riverside County Coroner must be immediately notified (800 S Redlands Ave., Perris, CA 92570, tel: 909.443.2300). Suspected human skeletal remains should never be handled or removed from their initial discovery location until a qualified archaeologist or the Riverside County Coroner is present. If human remains are noticed only after an excavation has re-deposited the materials, then the suspected materials and associated deposit should remained covered until assessed by the Riverside County Coroner. If the remains are determined to be Native American, the Riverside County Coroner will contact the Native American Heritage Commission.

All questionable materials inadvertently discovered—including suspected or not readily identifiable cultural resources—must be considered significant by the IEF construction crew until an archaeological specialist can provide an accurate assessment. If potentially significant cultural resources are detected and cannot be avoided by IEF construction, then impacts must be mitigated through data recovery or other means in consultation pertinent agencies and concerned parties.

13.3 Notification of Native Americans

Refer to Attachment 17.

14.0 PALEONTOLOGICAL RESOURCES

14.1 Identification of Paleontological Resources

To date no paleontological resource surveys have been conducted on the project components. However, the land surface encompassed by these project components has been subject to extensive natural and human-related surface disturbances. The potential for intact significant paleontological resources appears low. Prior to construction the Wildflower Energy LP will retain a qualified paleontologist to conduct a survey of the project components to ensure that no significant paleontological resources would be affected by the project.

14.2 Proposed Mitigation if Required

In the event of a discovery of previously unknown surface or subsurface paleontological resources before or during construction, the project applicant will stop work in the immediate vicinity of the discovery and retain a qualified paleontologist to ensure that

appropriate measures are taken to avoid and protect, or scientifically remove and curate the specimen.

15.0 VISUAL RESOURCES

15.1 Plan for Landscaping and Screening to Meet Local Requirements

Wildflower Energy LP has met with the City of Palm Springs Planning Director, Doug Evans on Thursday on 3/1/2001 to discuss a landscape design plan. Wildflower Energy LP has identified the following Desired Landscape Design Intent:

- Use architectural and landforms elements to make the industrial facility integrate into the environment.
- Enhance street frontage with landforms such as boulders, desert plants and colorful groundcover.
- Provide modular, stepped walls along 19th Avenue. Provide different wall heights, and different color tones. Use three different tones of earth colors in order to give an interesting and pleasant architectural look, and give depth to the site.
- Incorporate multi trunk trees, initially in a bush form then trimmed after they establish. Incorporate palm trees (i.e., *Washingtonia filifera*) to the landscaping. Use clusters of palms inside the facility.

Refer to Attachment 15 for a copy of Grading Plan, Attachment 16 for a copy of the Drainage Plan, and Attachment 17 for a copy of the Landscape Plan.

15.2 Full Size Color Photo of the Site and Rendering of Proposed Facility if Available

Refer to Attachments 19 and 3.

16.0 TRANSMISSION SYSTEM ENGINEERING

16.1 Conformance with Title 8, High Voltage Electrical Safety Orders, CPUC General Order 95 (or NESC), CPUC Rule 21, PTO Interconnection Requirements, and National Electric Code

The project will conform with Title 8, High Voltage Electrical Safety Orders, CPUC General Order 95 (or NESC), CPUC Rule 21, PTO Interconnection Requirements, and National Electric Codes.

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