



EDF Renewable Energy  
 15445 Innovation Drive  
 San Diego, CA 92129  
 858.521.3407

Variance: VAR-01  
 Request No.: Rev-0  
 Date Submit: 03/16/2023  
 Date Approved: \_\_\_\_\_  
 Agency Received: \_\_\_\_\_  
 Agency Approval Reference No.: \_\_\_\_\_

Request Prepared By: EDFR Spread/Location: N/A Location: See attached map Alignment Sheet/Sta. No: N/A Landowner: BLM Current Land use/Vegetation Cover: N/A	Net acreage affected: NA Tract No: N/A In or within 50 feet of a wetland: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Within 50 feet of a water body: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Nearby Features (Water body, T&E Habitat, Wetland, Noxious Weeds) N/A  
 Area, Residence, Resource Site (distance, etc.): N/A

Variance Level:  Level 1  Level 2  Level 3 (To be assigned by Designated Representative)  
 Variance Form:  Permit  Plan/Procedure  Specification Drawing  Mitigation Measure  Other:

Detailed Description of Variance:	Attachments? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Photos? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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In support of the Desert Quartzite Solar Project, Variance 01 (VAR-01) is proposing additional traffic and safety controls placed within the access road ROW (See **Attachment B** for location).

The proposed Variance includes placing "deadman" concrete blocks (**Attachment C**), stacked two high, in the shoulder of the access road just south of 16<sup>th</sup> Ave/Seeley Ave. A locked chain would span the distance of the road connecting the concrete blocks. The chain would be locked at the end of the working day to prevent any unauthorized vehicle staging along the access road.

The intent of the proposed action is to dissuade delivery drivers from entering the access road after hours when the main gate is locked. Delivery hours (Monday -Thursday 6:30am -2:30pm) are specifically stated in the logistics handout the contractor is distributing to delivery subcontractors.

With the chain locked after hours, there is ample space for staging along the County public road of 16<sup>th</sup> Ave/Seeley Ave, until the Contractor unlocks the chain early in the morning, (see **Attachment B** figure 2).



The proposed Variance could prevent any cross-country travel associated with unauthorized delivery attempts along the access road. In the event a delivery truck arrives after hours or over a weekend/holiday the Proposed action would be applicable. The site access road is the only ingress/egress avenue for the Project, any attempt to turn around or park alongside the access road could result in unanticipated impacts to vegetation and/or soils outside the authorized limits of disturbance.


Variance Justification:  
 This Variance is proposed as a preventative measure to prevent delivery drivers from parking and staging alongside the access road and main access gate after hours. See **Attachment A** for Purpose and Need.

**For (Company Name) Use Only**

Additional Surveys Required	Survey Corridor Description	Additional Surveys Completed
Cultural Survey <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
T&E Species Survey <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Report Documenting Survey:

Sign-off (as appropriate)	Name (print)	Approval Signature	Conditions (see attached)
Project's Owner Representative	Adam Rock/Jason Kern/Levi Cox	 <small>LC (Mar 21, 2023 09:12 PDT)</small>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Lead Biologist	Chris Blandford	 <small>Chris D Blandford (Mar 22, 2023 14:32 PDT)</small>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Environmental Manager	Bryon Bigrigg	<b>Bryon Bigrigg</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Cultural Resource Specialist	Matt Tennyson	<b>Matt Tennyson</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>For BLM Project Manager or Compliance Contact Use Only</b>			
Variance Approved: 	Variance Denied:	Date:	
Signature:			
<b>For Compliance Manager and Monitor Use Only</b>			
Variance Approved:	Variance Denied:	Date:	
Signature:			
Stipulations:			
Spread: <b>See Figures</b>	OPCC Variance Request No.: <b>001</b>		
<b>VARIANCE CONDITIONS</b>			
Name: <b>Ed Iglesias</b>	Title: <b>AO, TPC</b>	Organization: <b>BLM/Dudek</b>	
Conditions: <b>Area will need to be returned to pre project conditons at end of project or when gate is no longer needed to address deliveries after hours. Additionally, any unexpected impacts to the area will need to be addressed and areas brought back to pre project conditons.</b>			
Spread:	OPCC Variance Request No.:		
<b>VARIANCE CONDITIONS</b>			
Name:	Title:	Organization:	
Conditions:			
Spread:	OPCC Variance Request No.:		
<b>VARIANCE CONDITIONS</b>			
Name:	Title:	Organization:	
Conditions:			

# **Attachment A**

Purpose and Need

# Desert Quartzite Solar Variance 1

## Purpose and Need

The Right-of-Way Grant (ROW) for the Desert Quartzite Solar Project (Project) was issued by the Bureau of Land Management (BLM) on 08-05-2020, and construction of the Project began on 02-01-2023. The Project is requesting Variance 1 (VAR-1) to install additional temporary traffic and safety control measures at the main entrance of the Project within the access road for the duration of construction deliveries of the Project. At present, the access road, if delivery drivers attempt to access the solar site outside of delivery hours, have the potential to cause traffic and safety issues. The main gate at the entrance of the Project is located down an approximate 2-mile access road south of 16th Avenue/Seeley Ave (a County public road). During work hours, delivery trucks can drive into the site via the 20-foot-wide access road and have the ability to turn around in the main laydown/staging yard. After work hours, there is a gate at the laydown staging area that is closed and locked for security purposes.

VAR-1 proposes installing temporary concrete blocks and a locked chain at the beginning of the access road off 16<sup>th</sup> Avenue/Seely Avenue to dissuade trucks from making after hours deliveries when the staging area gate is locked and there is no ability to turn trucks around. Delivery hours are Monday-Thursday (6:30am -2:30pm) and are clearly stated in the logistics handout the contractor is distributing to delivery subcontractors.

## Proposed Action – Temporary Gate Along Project’s Access Road

### Location of Proposed Action

VAR-1 proposes to install a temporary gate along the access road to the Project site just south of the 16<sup>th</sup> Avenue/Seeley Avenue intersection (**Attachment B**).

### Description

VAR-1 proposes to install concrete blocks, also known as “deadmen”, on both sides of the access road within the road shoulder. The concrete blocks would be stacked two-blocks high for added height (**Attachment C**). A chain would span the distance of the access road connecting the concrete blocks and serving as a temporary gate across the access road. The chain would be locked at the end of the working day to dissuade delivery drivers from making after-hours deliveries and driving down the 2-mile access road. This variance is proposed as a safety measure to prevent delivery drivers from potentially parking and staging alongside the access road and main access gate after hours.

## Overview of Impacts

**Table 1: Overview of Impacts for Proposed Action**

Resource	Variance Action Impact Description
Lands & Realty	VAR-1 is within Project-approved disturbance limits. The location of the concrete structures would remain within the ROW of the access road.

Resource	Variance Action Impact Description
<b>Air Quality</b>	There will be no additional air quality impacts as a result of the proposed action. Dust control measures will continue to be implemented as per the Project's Dust Control Plan.
<b>Cultural</b>	This area is within previously surveyed areas for cultural resources and additional ground disturbance associated with VAR-1 will be minimal with the footprint of the concrete blocks. There will be no new impacts to cultural resources as a result of the proposed action. Cultural resource protection measures will continue as per the Project's Cultural Resources Monitoring and Discovery Plan.
<b>Paleontological</b>	This area is within previously surveyed areas for paleontological resources and additional ground disturbance associated with VAR-1 will be minimal with the footprint of the concrete blocks. There will be no new impacts to paleontological resources as a result of the proposed action. Paleontological resource protection measures will continue as per the Project's Paleontological Resources Monitoring and Mitigation Plan.
<b>Biological – Vegetation</b>	This area is within previously surveyed areas for biological resources and additional ground disturbance associated with VAR-1 will be minimal with the footprint of the concrete blocks. There will be no new impacts to vegetation as a result of the proposed action. Biological resource protection measures will continue as per the conditions of the Record of Decision and Project permits.
<b>Biological – Wildlife</b>	This area is within previously surveyed areas for biological resources and additional ground disturbance associated with VAR-1 will be minimal with the footprint of the concrete blocks. No new impacts to wildlife will be affected by the proposed action. Biological resource protection measures will continue as per the Biological Resources Mitigation Implementation and Monitoring Plan. Preconstruction surveys will be conducted to clear the area of wildlife prior to the work being conducted.
<b>Biological – Nesting Birds</b>	This area is within previously surveyed areas for biological resources and additional ground disturbance associated with VAR-1 will be minimal with the footprint of the concrete blocks. Nesting bird surveys will continue as per the Project's Nesting Bird Monitoring and Management Plan (NBMMP). All active nests will be protected by an ESA and avoided consistent with the NBMMP. There are no additional requirements for the Proposed Action.
<b>Biological – Jurisdictional Waters</b>	There are no jurisdictional waters in proximity to the proposed action, as such there will be no new impacts to jurisdictional waters as a result of the proposed action.
<b>Drainage, Erosion, and Sediment Control</b>	Ground disturbance associated with the proposed action will be minimal and there will be no need for additional drainage, erosion, or sediment controls. Drainage, erosion, and sediment controls may be installed as specified in the Surface Water Protection Plan.

<b>Resource</b>	<b>Variance Action Impact Description</b>
<b>Groundwater</b>	Ground disturbance associated with the proposed action will be minimal with the footprint of the concrete blocks and no excavation is proposed. There will be no impacts to groundwater as a result of the proposed action.
<b>Soil/Hydrology</b>	Ground disturbance associated with the proposed action will be minimal with the footprint of the concrete blocks and no changes to onsite hydrology will result, as such there will be no new impacts to soils or hydrology as a result of the proposed action.
<b>Recreation / Safety</b>	The proposed action would be marked with high visibility flagging and cones to indicate the location of the chain and blocks to prevent unanticipated collisions.



# Attachment B

## Site Layout



Figure 1.Chain and Concrete Block Location.



Figure 2. Delivery Staging Along 16th/Ave/Seeley Ave.



# Attachment C

## Concrete Block “Deadman” Examples



*Figure 3. Concrete Blocks for Chain Connection.*