



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

Variance: VAR-03
 Request No.: Rev-1
 Date Submit: 10/17/2023
 Date Approved: _____
 Agency Received: _____
 Agency Approval Reference No.: _____

Request Prepared By: EDFR
 Spread/Location: N/A
 Location: See Attachment B
 Alignment Sheet/Sta. No: N/A
 Landowner: BLM
 Current Land use/Vegetation Cover: Moderate to highly disturbed Sonoran creosote bush scrub

Net acreage affected: 0
 Tract No: N/A
 In or within 50 feet of a wetland: Yes No
 Within 50 feet of a water body: Yes No

Nearby Features (Water body, T&E Habitat, Wetland, Noxious Weeds) Invasive species include Sahara mustard, Mediterranean grass, and Russian thistle
 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: See attached. Attachments? Yes No Photos? Yes No

In support of the Desert Quartzite Solar Project, Variance 03 (VAR-03) (See **Attachment B** for location).

Variance Justification:
 The proposed variance involves an adjustment to the location of the operations and maintenance (O&M) building within the approved project site. The proposed location of the O&M building is 400 feet to the north of the approved location. The variance is being requested to locate the O&M building closer to the onsite power source.
 See Attachment A for the Purpose and Need
 See Attachment B for a map of the approved and proposed O&M building location.

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 T&E Species Survey <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N/A	<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	<u>Levi D Cox</u> <small>Levi D Cox (Sep 28, 2023 09:14 PDT)</small>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Lead Biologist	Chris Blandford	<u>Chris Blandford</u> <small>Chris Blandford (Oct 12, 2023 10:24 PDT)</small>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Environmental Manager	Bryon Bigrigg	<u>Bryon Bigrigg</u> <small>Bryon Bigrigg (Sep 28, 2023 09:21 PDT)</small>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Cultural Resource Specialist	Matt Tennyson	<u>Matt Tennyson</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

For BLM Project Manager or Compliance Contact Use Only

Variance Approved: **Approved**   Variance Denied: _____ Date: **January 8, 2024**

For Compliance Manager and Monitor Use Only

Variance Approved: _____ Variance Denied: _____ Date: _____
 Signature: _____
 Stipulations: _____

Spread:		OPCC Variance Request No.:
VARIANCE CONDITIONS		
Name:	Title:	Organization:
Conditions:		
Spread:		OPCC Variance Request No.:
VARIANCE CONDITIONS		
Name:	Title:	Organization:
Conditions:		
Spread:		OPCC Variance Request No.:
VARIANCE CONDITIONS		
Name:	Title:	Organization:
Conditions:		

Attachment A

Purpose and Need

Desert Quartzite Solar Project, Variance 3

Purpose and Need

On August 5, 2020, the Bureau of Land Management (BLM) issued a Right-of-Way (ROW) Grant for the Desert Quartzite Solar Project (Project), CACA-049397. The final plan of development (POD) was submitted on January 5, 2023, and construction of the Project began on February 1, 2023. The ROW grant and final POD included an approximately 35-acre area including the operations and maintenance (O&M) building, Project substation, and BESS facility. Variance 3 proposes relocating the O&M building approximately 400 feet to the north of the approved location. The location of the substation and BESS would remain unchanged. The proposed location of the O&M building is within the approved Project boundary and has been previously surveyed for and cleared of sensitive biological, cultural, and paleontological resources.

In an effort to minimize electrical losses, construction materials and labor, it was determined that relocating the O&M facility closer to the associated meter infrastructure would provide a more efficient plant layout. The SLC loop for the First Responder panel installation at the O&M building's original location would have exceeded the maximum length for the loop. This would result in too much voltage loss making the fire annunciator panel susceptible to failure. The relocation of the O&M building is exclusively associated with the efficiency of the BESS equipment and its relation to the fire control panel/associated wiring and bears no relation to the distribution power line.

Proposed Action

Location of Proposed Action

The approved location of the approved O&M building is approximately 400 feet southeast of the Project's substation and BESS within the Project area. The proposed location of the O&M building is illustrated in Attachment B.

Description

The Proposed Action, and subject of Variance Request 3, would relocate the O&M building 400 feet to the north of the location approved in the ROW Grant.

Overview of Impacts

Table 1: Overview of Impacts for Proposed Action

Resource	Variance Action Impact Description
Lands & Realty	VAR-3 is within Project-approved disturbance limits.
Air Quality	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.

Resource	Variance Action Impact Description
Cultural	The proposed location for the O&M building is within previously surveyed areas for cultural resources and 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.
Paleontological	The proposed location for the O&M building is within previously surveyed areas for paleontological resources and 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.
Biological–Vegetation	The proposed location for the O&M building is within previously surveyed areas for biological resources and there will be no new impacts to vegetation as a result of the proposed action as the proposed location is already disturbed. Biological resource protection measures will continue as per the Biological Resources Mitigation Implementation and Monitoring Plan.
Biological – Wildlife	The proposed location for the O&M building is within previously surveyed areas for biological resources and no new impacts to wildlife will occur. 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.
Biological – Nesting Birds	The proposed location for the O&M building is within previously surveyed areas for biological resources and no new impacts to nesting birds will occur. 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.
Biological – Jurisdictional Waters	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.
Drainage, Erosion, and Sediment Control	The proposed location for the O&M building is already disturbed and there will be no need for additional drainage, erosion, or sediment controls. Drainage, erosion, and sediment controls will continue to be installed as specified in the Stormwater Protection Plan.
Groundwater	Ground disturbance associated with the proposed action will be minimal. The proposed operations and maintenance building will have a smaller plot sized that what was originally proposed. There will be no impacts to groundwater as a result of the proposed action.

Desert Quartzite Solar Project
Variance 3

Resource	Variance Action Impact Description
Soil/Hydrology	The proposed location for the O&M building has the same soil type as the approved location and therefore no new impacts to soils will occur. Additionally, the proposed location of the O&M building would create equal amount of permanent disturbance and impervious surface as the originally approved location.. No changes to onsite hydrology would occur.

Attachment B

Figures

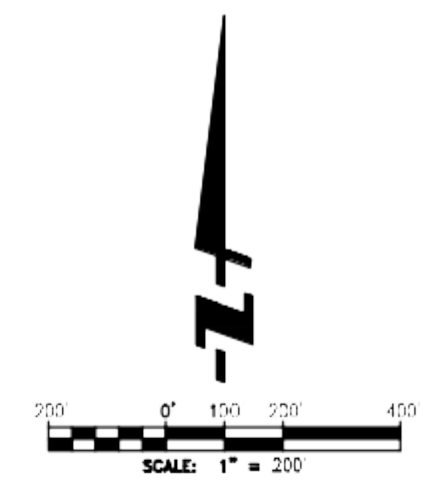
DESERT QUARTZITE


O&M SITE PLAN EXHIBIT

FUSCOE
ENGINEERING

JOB NO.

DRAWN BY:



	1482-015
	PC

PROJECT: 1482-015, COUNTY: SD, DATE: 08-21-2023, 10:58:48 AM, USER: J. CHAMBERLAIN, PLOT: 1482-015-01, SCALE: 1"=200'












DQ_VAR-03_Combined


Final Audit Report

2023-10-12

Created:	2023-09-27
By:	Elizabeth McCullough (elizabeth.mccullough@panoramaenv.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAADKjNmXD29gJXKhD5TLS3tG6OLkc-MxB

"DQ_VAR-03_Combined" History


-  Document created by Elizabeth McCullough (elizabeth.mccullough@panoramaenv.com)
2023-09-27 - 10:22:12 PM GMT
-  Document emailed to levi.cox@edf-re.com for signature
2023-09-27 - 10:22:52 PM GMT
-  Email viewed by levi.cox@edf-re.com
2023-09-28 - 4:13:43 PM GMT
-  Signer levi.cox@edf-re.com entered name at signing as Levi D Cox
2023-09-28 - 4:14:23 PM GMT
-  Document e-signed by Levi D Cox (levi.cox@edf-re.com)
Signature Date: 2023-09-28 - 4:14:25 PM GMT - Time Source: server
-  Document emailed to bryon.bigrigg@edf-re.com for signature
2023-09-28 - 4:14:27 PM GMT
-  Email viewed by bryon.bigrigg@edf-re.com
2023-09-28 - 4:19:12 PM GMT
-  Signer bryon.bigrigg@edf-re.com entered name at signing as Bryon Bigrigg
2023-09-28 - 4:21:02 PM GMT
-  Document e-signed by Bryon Bigrigg (bryon.bigrigg@edf-re.com)
Signature Date: 2023-09-28 - 4:21:04 PM GMT - Time Source: server- Signature captured from device with phone number XXXXXXX0624
-  Document emailed to Matt Tennyson (mtennyson@paleowest.com) for signature
2023-09-28 - 4:21:06 PM GMT
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 Signer chris@ironwoodbio.com entered name at signing as Chris Blandford

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 Document e-signed by Chris Blandford (chris@ironwoodbio.com)

Signature Date: 2023-10-12 - 5:24:48 PM GMT - Time Source: server

 Agreement completed.

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