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November 21, 2006

Allen Fisksdal, Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, Washington 98504

Re: Cherry Point Cogeneration Project - Request for SCA Amendment

Dear Allen:

We are writing on behalf of BP West Coast Products, LLC (BP) to request a change in the areas to be used for laydown during construction of the Cherry Point Cogeneration Project. Although the text of the Site Certification Agreement (SCA) does not itself identify the laydown areas, it incorporates the Application for Site Certification by reference, and the Application specified the areas that would be used for construction laydown. We are, therefore, requesting an amendment in the SCA to allow a change in the construction laydown areas.

The following sections provide a brief description of the amendment requested, address the SCA amendment process, explain why BP's request satisfies the requirements set forth in the Council's regulations, and address compliance with the State Environmental Policy Act (SEPA) and National Pollution Discharge Elimination System (NPDES) permitting requirements. BP's request is also supported by the enclosed SEPA Environmental Checklist.

Amendment Requested

BP requests a change in the areas used for laydown during construction of the Cogeneration Project. As explained below, rather than use Laydown Area 2, the Cogeneration Project now proposes to use previously-developed land that is available at the Refinery.

In the April 2003 Revised Application for Site Certification, BP identified four areas that would be used for equipment and materials storage, laydown and assembly during construction of the Cogeneration Project: Laydown Area 1 (located south of Grandview Road and west of Blaine Road); Laydown Area 2 (located between Laydown Area 1 and Grandview Road); Laydown

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Area 3 (located between Laydown Area 1 and Blaine Road), and Laydown Area 4 (located south of Grandview Road, and west of Blaine Road). These areas are shown on the enclosed Figure.

As described in the Application and approved in the SCA, BP will fill these areas, cover them with a gravel surface, and use them for construction laydown.¹ After the completion of construction, Laydown Areas 1, 2 and 3 were to remain developed and be turned over to the Refinery for further use. Laydown Area 4 was to be restored.

BP does not now intend to use Laydown Area 2 for the Cogeneration Project. Instead, the Refinery would like to proceed to develop that area and use it for Refinery facilities.² In exchange for being able to make immediate use of this area, the Refinery will make existing developed areas south of the Cogeneration Project site available to the Cogeneration Project for use during construction. The Cogeneration Project will comply with the Refinery's existing permit conditions in using those areas.

Under the laydown configuration now proposed, the Cogeneration Project will develop and implement a Stormwater Pollution Prevention Plan (SWPPP) to cover Laydown Areas 1, 3 and 4. Stormwater from Laydown Areas 1 and 3 will be directed to Detention Pond 2, shown on the enclosed Figure, and stormwater from Laydown Area 4 will be directed to Detention Pond 1.

The Refinery will be responsible for obtaining whatever additional permits are required to utilize Laydown Area 2. At this time, we anticipate that Detention Pond #2 will be sized so that it can accommodate stormwater runoff from Laydown Area 2 as well as the laydown areas being utilized by the Cogeneration Project.

SCA Amendment Process

Council regulations found at WAC chapter 463-66 govern amendments to an SCA. WAC 463-66-030 provides as follows:

A request for amendment of a site certification agreement shall be made in writing by a certificate holder to the council. The council will consider the request and determine a schedule for action at the next feasible council meeting. The council may, if appropriate and required for full

¹ The Corps of Engineers has issued a Section 404 permit authorize the fill of wetlands found in these areas.

² The Refinery proposes to relocate some occupied buildings to this area in order to comply with new safety regulations that require occupied buildings to be located further away from potential hazards.

understanding and review of the proposal, secure the assistance of a consultant or take other action at the expense of the certificate holder. The council shall hold one or more public hearing sessions upon the request for amendment at times and places determined by the council.

Depending upon the sort of amendment being sought, the Council may approve the amendment by resolution, or the Governor's approval may be required. WAC 463-66-070 provides that "[a]n amendment which does not substantially alter the substance of any provisions of the SCA, or which is determined not to have a significant detrimental effect upon the environment, shall be effective upon approval by the council." On the other hand, WAC 463-66-080 provides that "[a]n amendment which substantially alters the substance of any provision of the SCA or which is determined to have a significant detrimental effect upon the environmental shall be effective upon the signed approval of the governor."

BP believes the requested amendment can be approved by Council resolution because it will not substantially alter the substance of any provision in the SCA and will not have a significant detrimental effect on the environment. The original SCA contemplated that nearby areas would be used for construction laydown, and that laydown areas would be transferred to the Refinery for further use after Cogeneration Project construction was completed. With the requested change, the Cogeneration Project will continue to use nearby areas for laydown. No additional areas will require development or fill, and stormwater runoff from construction laydown areas will continue to be regulated. The requested change will merely accelerate the transfer of these areas to the Refinery.

Regulatory Requirements

WAC 463-66-040 provides:

In reviewing any proposed amendment, the council shall consider whether the proposal is consistent with:

1. The intention of the original SCA;
2. Applicable laws and rules; and
3. The public health, safety, and welfare.

The requested amendment satisfies these three requirements.

1. Intention of the Original SCA

The proposed amendment is consistent with the intent of the SCA. The SCA contemplated that the Cogeneration Project would use nearby areas for construction laydown, and that those areas would be transferred to the Refinery for further use following construction. Eventually, therefore, these areas would belong to the Refinery and would be outside of EFSEC's jurisdiction. With the requested amendment, the Cogeneration Project will continue to use nearby areas for laydown, Laydown Area 2 could be used by the Refinery immediately, and the other laydown areas will revert to the Refinery's use later.

2. Consistency with Applicable Laws and Rules

The requested amendment is consistent with applicable laws and rules. The requested change to the SCA is consistent with laws and rules governing power generation facilities in Washington. Compliance with SEPA and the Project's NPDES permit are discussed below.

3. Consistency with Public Health, Safety and Welfare

The requested amendment is consistent with public health, safety and welfare. As explained above, and documented in more detail in the attached SEPA Checklist, the requested change to the SCA will not result in any significant additional environmental impacts.

SEPA

The Council is obligated to comply with the State Environmental Policy Act (SEPA), RCW chapter 43.21C. BP has completed and enclosed a SEPA checklist. The checklist explains why the requested amendment would not result in significant adverse effects on the environment. Accordingly, BP believes it is appropriate for the Council's SEPA official to issue a determination of non-significance (DNS).

NPDES Permit

The SCA authorizing the construction and operation of the Cogeneration Project includes as an attachment a National Pollutant Discharge Elimination System Permit (NPDES Permit No. EFSEC 2002-01), that the Council issued pursuant to the federal Clean Water Act and Washington state law. The NPDES permit authorizes discharges of stormwater during construction and operation of the Cogeneration Project.

BP does not believe any amendment to the NPDES permit is necessary. The NPDES permit generally authorizes the discharge of stormwater from areas used for construction of the

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Cogeneration Project and imposes various conditions and monitoring requirements with respect to those discharges. However, the NPDES permit does not specifically identify the areas that will be used for construction laydown, and therefore, need not be amended to remove any reference to Laydown Area 2.

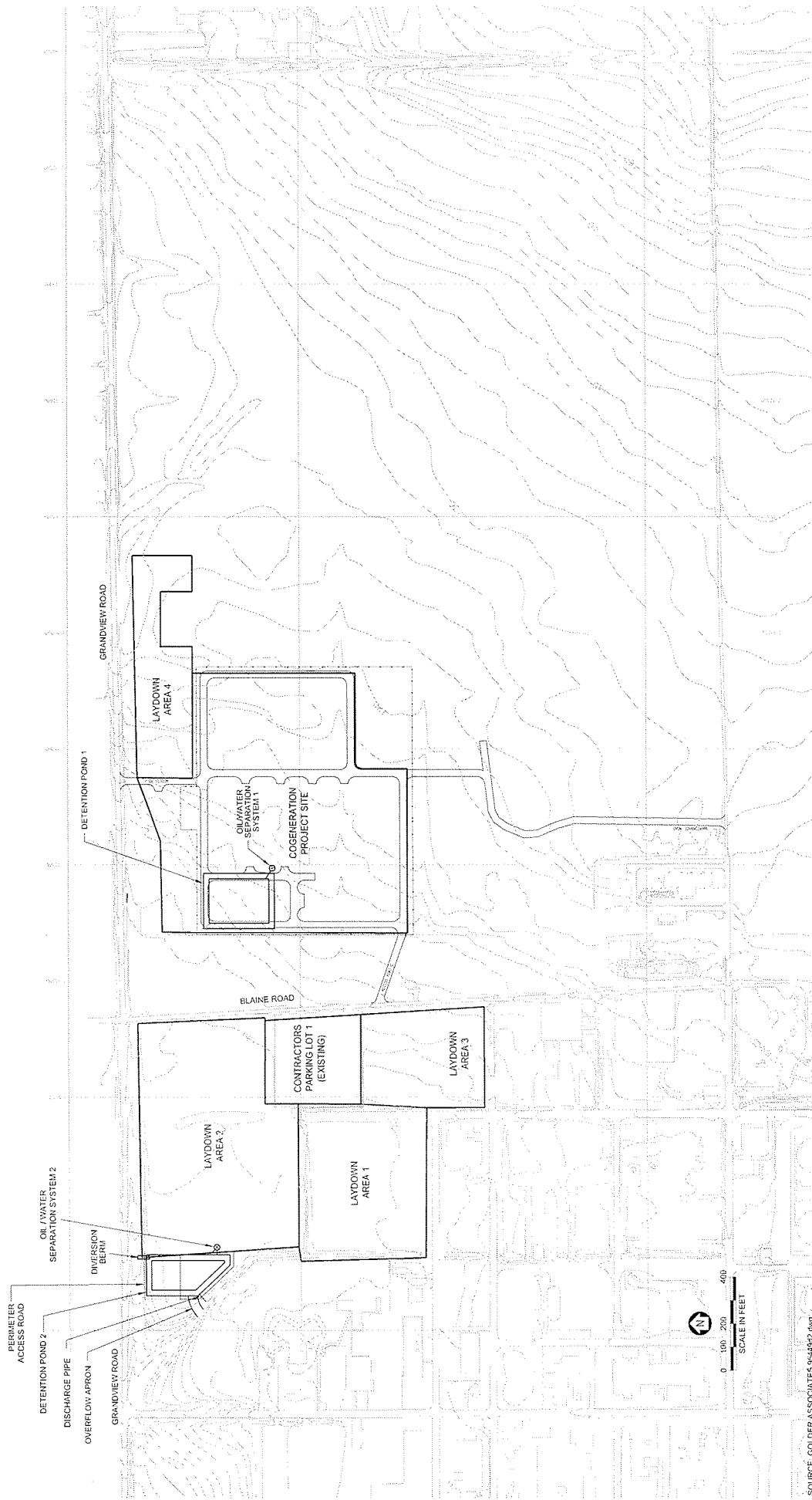
For the foregoing reasons, BP asks the Council to amend its SCA. Please feel free to call me or Trent Enzsol at BP (360-371-4607) if you need any additional information.

Sincerely,



Karen M. McGaffey

cc: Trent Enzsol, BP
Mark Moore, BP



**FIGURE 1
SITE MAP**

BPI/CHERRY POINT COGENERATION PROJECT/MA

SOURCE: GOLDER ASSOCIATES 9/04/2002.dwg

FILENAME: C:\pds\BriCherry\pds\ER\Fig 1 SITE.dwg
 EXT DATE: 11/07/06 AT: 15:51



WAC 197-11-960 Environmental checklist.

ENVIRONMENTAL CHECKLIST

Purpose of checklist:

The State Environmental Policy Act (SEPA), chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Use of checklist for nonproject proposals:

Complete this checklist for nonproject proposals, even though questions may be answered "does not apply." IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D).

For nonproject actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

A. BACKGROUND

1. Name of proposed project, if applicable: BP Cherry point Cogeneration Project
2. Name of applicant: BP West Coast Products LLC

3. Address and phone number of applicant and contact person:

Trent Enzsol
4519 Grandview Road, Blaine, WA 98230
(360) 371-4607

4. Date checklist prepared: November 3, 2006

5. Agency requesting checklist: Energy Facility Site Evaluation Council

6. Proposed timing or schedule (including phasing, if applicable):

BP proposes to commence construction of the Cogeneration Project within the term of the existing Site Certification Agreement (SCA), which requires construction to commence by December 21, 2014.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. No

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Final Environmental Impact Statement, BP Cherry Point Cogeneration Project (August, 2004), hereafter "FEIS" Application for Site Certification (Revised April, 2003)

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. Yes. An application for an amendment to the PSD permit for the Project is pending before EFSEC.

10. List any government approvals or permits that will be needed for your proposal, if known.

Amendment of Site Certification Agreement

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

BP already possesses a Site Certification Agreement (SCA) and related permits authorizing the construction and operation of a gas-fired cogeneration facility known as the Cherry Point Cogeneration Project. BP now seeks to amend the existing SCA by removing Lay Down Area 2 from the SCA to allow the Cherry Point Refinery to use that area. The Refinery in turn would provide the Cogeneration Project access to areas already developed and permitted by the Refinery.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The Cogeneration Project is located in unincorporated Whatcom County, along Grandview Road, adjacent to the Cherry Point Refinery.

TO BE COMPLETED BY APPLICANT

EVALUATION FOR

AGENCY USE

ONLY

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other
The Cogeneration Project site is relatively flat. A detailed description of the site is provided in the FEIS.

b. What is the steepest slope on the site (approximate percent slope)?
Refer to FEIS

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.
Refer to FEIS

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.
Refer to FEIS

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.
The requested amendment will not result in any additional fill. Fill associated with the approved project is addressed in the FEIS.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.
The requested amendment will not result in any additional erosion. It will in effect decrease the footprint of the Cogeneration Project, but increase the footprint of the Refinery, with no overall change in the area of disturbed and filled land. A detailed analysis of potential erosion and mitigation measures associated with the approved Cogeneration Project is provided in the FEIS.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?
The requested amendment will not result in any change in the overall amount of impervious surface, although it will decrease the amount of impervious surfaces associated with the Cogeneration Project and increase that associated with the Refinery.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:
The mitigation measures proposed in the FEIS remain unchanged. Both the Cogeneration Project and the Refinery must implement erosion control measures required by their NPDES permits.

2. Air

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.
The requested amendment will not result in any increase in air emissions. To the extent that construction activities may result in some fugitive dust or vehicle emissions, the requested amendment will likely decrease the potential emissions from the Cogeneration Project and increase the emissions from Refinery activities because the Refinery will be undertaking those construction activities in Laydown Area #2, rather than the Cogeneration Project.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. No

c. Proposed measures to reduce or control emissions or other impacts to air, if any:
The mitigation measures proposed in the FEIS for the lay down areas would remain unchanged.

3. Water

a. Surface:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Refer to FEIS

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

The requested amendment will not result in any such work.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

The requested amendment would not change the overall impacts to wetlands or the approved mitigation plan. The FEIS and wetland mitigation plan discuss the impacts in greater detail.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No, the requested amendment will not change surface water withdrawals for the Cogeneration Project.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No, the requested amendment does not change mitigation measures described in the FEIS.

b. Ground:

1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

No. The requested amendment does not involve groundwater withdrawals or discharges. The approved project is addressed in the FEIS.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

The requested amendment does not concern waste discharges. Refer to FEIS regarding the approved project.

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

The stormwater system is described in the original application for Site Certification and the FEIS. The SCA and NPDES Permit for the Cogeneration Project requires the submission of a Storm Water Pollution Prevention Plan (SWPPP) and Engineering Report prior to construction. The Cogeneration Project does not expect that the mitigation measures proposed in the FEIS will change; however, this will be confirmed during the development of the SWPPP and Engineering report.

2) Could waste materials enter ground or surface waters? If so, generally describe.

The requested amendment will not change the handling of waste materials. Refer to FEIS for discussion of these issues regarding the approved project.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

The requested amendment does not make any changes to these measures. Mitigation measures associated with the approved project are described in the application for Site certification and FEIS.

4. Plants

a. Check or circle types of vegetation found on the site: Refer to FEIS

- Deciduous tree: Alder, maple, aspen, other
- Evergreen tree: Fir, cedar, pine, other
- Shrubs
- Grass
- Pasture
- Crop or grain
- Wet soil plants: Cattail, buttercup, bullrush, skunk cabbage, other
- Water plants: Water lily, eelgrass, milfoil, other
- Other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

The requested amendment will not result in additional impacts to vegetation. Refer to FEIS for discussion of impacts associated with approved project.

c. List threatened or endangered species known to be on or near the site.

Refer to FEIS

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

The requested amendment will not change the proposed landscaping and mitigation measures described in the FEIS.

5. Animals

a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site: Refer to FEIS

Birds: Hawk, heron, eagle, songbirds, other:

Mammals: Deer, bear, elk, beaver, other:

Fish: Bass, salmon, trout, herring, shellfish, other:

- b. **List any threatened or endangered species known to be on or near the site.**
Refer to FEIS
- c. **Is the site part of a migration route? If so, explain.**
Refer to FEIS
- d. **Proposed measures to preserve or enhance wildlife, if any:**
The requested amendment will not impact wildlife, and therefore, no additional measures are proposed to preserve or enhance wildlife. The mitigation measures associated with the approved project are described in the FEIS.

6. **Energy and natural resources**

- a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**
Refer to FEIS and Application for Site Certification.
- b. **Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**
No
- c. **What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:**
The requested amendment will not result in increased energy use, and does not include any energy conservation features. Energy conservation features of the approved project are discussed in the Application for Site Certification and FEIS.

7. **Environmental health**

- a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.**
No. The requested amendment will not change the use and mitigation measures described in the FEIS and Application for Site Certification.

1) Describe special emergency services that might be required.

No special emergency services are expected to be required as a result of the requested amendment. Refer to FEIS for a discussion of emergency services in connection with the approved project.

2) Proposed measures to reduce or control environmental health hazards, if any:

No health hazards are associated with the requested amendment and, therefore, no measures to reduce hazards are proposed. Refer to FEIS for a discussion of health hazards and mitigation measures associated with the approved project.

b. **Noise**

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Refer to FEIS

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

The proposed amendment is not expected to change the types and levels of noise described in the FEIS.

3) Proposed measures to reduce or control noise impacts, if any:

The proposed measures to mitigate noise described in the FEIS remain unchanged.

8. Land and shoreline use

a. What is the current use of the site and adjacent properties?

Refer to FEIS

b. Has the site been used for agriculture? If so, describe.

Refer to FEIS

c. Describe any structures on the site.

Refer to FEIS

d. Will any structures be demolished? If so, what?

No, not as a result of the request amendment.

e. What is the current zoning classification of the site?

Heavy Impact Industrial

f. What is the current comprehensive plan designation of the site?

Major/Port Industrial Growth Areas with the Cherry Point Urban Growth Area

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

The project site includes wetlands. The requested amendment will not result in any additional wetland impacts or changes to the proposed wetland mitigation measures described in the approved Wetland Mitigation Plan.

i. Approximately how many people would reside or work in the completed project?

The Cogeneration Project will employ approximately 30.

j. Approximately how many people would the completed project employ?

Approximately 30.

k. Proposed measures to avoid or reduce displacement impacts, if any:

None. The requested amendment will not result in any displacement.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

The requested amendment will not result in any change in land use. Refer to FEIS for a discussion of the land use impacts associated with the approved project.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

Zero

- b. **Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

Zero

- c. **Proposed measures to reduce or control housing impacts, if any:**

No measures are proposed because no impacts are expected.

10. **Aesthetics**

- a. **What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

The requested amendment does not propose any structure. Refer to application for Site Certification for description of structures associated with the approved project.

- b. **What views in the immediate vicinity would be altered or obstructed?**

The proposed amendment is not expected to change the impacts on views. The FEIS discusses the potential impact of the approved project on views.

- c. **Proposed measures to reduce or control aesthetic impacts, if any:**

No measures are proposed because the requested amendment will not impact views. Refer to FEIS for a discussion of measures associated with the approved project.

11. **Light and glare**

- a. **What type of light or glare will the proposal produce? What time of day would it mainly occur?**

The requested amendment is not expected to change light and glare impacts.

- b. **Could light or glare from the finished project be a safety hazard or interfere with views?**

No, refer to FEIS

- c. **What existing off-site sources of light or glare may affect your proposal?**

None

- d. **Proposed measures to reduce or control light and glare impacts, if any:**

No measures are proposed because the requested amendment will not result in light or glare impacts. Refer to FEIS for a discussion of measures associated with the approved project.

12. **Recreation**

- a. **What designated and informal recreational opportunities are in the immediate vicinity?**

Refer to FEIS.

- b. **Would the proposed project displace any existing recreational uses? If so, describe.**

No

- c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

No measures are proposed because the requested amendment will not impact recreational uses. Refer to FEIS for a discussion of impacts associated with the approved project.

13. Historic and cultural preservation

- a. **Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.**

Refer to FEIS.

- b. **Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.**

Refer to FEIS

- c. **Proposed measures to reduce or control impacts, if any:**

The requested amendment will not impact historical or cultural landmarks or objects, and therefore no measures are proposed. Refer to FEIS for a discussion of potential impacts and mitigation measures associated with the approved project.

14. Transportation

- a. **Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.**

Refer to FEIS

- b. **Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?**

Refer to FEIS

- c. **How many parking spaces would the completed project have? How many would the project eliminate?**

The requested amendment will have no effect on the number of parking spaces associated with the Cogeneration Project. Refer to FEIS for a discussion of parking associated with the approved project.

- d. **Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).**

No, the requested amendment will not. Refer to FEIS for discussion of roads and improvements associated with the approved project.

- e. **Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

Refer to FEIS

- f. **How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.**

The requested amendment will not result in any additional vehicular trips. Refer to FEIS and application for Site Certification for a discussion of vehicle trips associated with the approved project.

- g. **Proposed measures to reduce or control transportation impacts, if any:**

No measures are proposed in connection with the requested amendment. Refer to FEIS for discussion of measures associated with the approved project.

15. Public services

- a. **Would the project result in an increased need for public services (for example: Fire protection, police protection, health care, schools, other)? If so, generally describe.**

The requested amendment will not increase the need for public services.

- b. **Proposed measures to reduce or control direct impacts on public services, if any.**

No measures are proposed in connection with the requested amendment. Refer to FEIS for a discussion of

measures associated with the approved project.

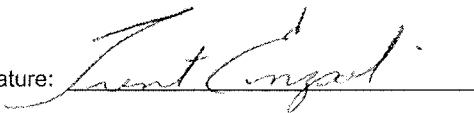
16. Utilities

a. Circle utilities currently available at the site: Electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.
Refer to FEIS

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.
The requested amendment does not propose any additional utilities. Refer to FEIS for a discussion of utilities associated with the approved project.

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: 

Date Submitted: November 20, 2006