

PETITION FOR CHANGES TO
CONDITIONS OF CERTIFICATION
MARSH LANDING GENERATING
STATION
(08-AFC-3C)

DOCKET 08-AFC-3C
DATE _____
RECD. MAY 14 2012

Submitted to:

The California Energy Commission

Submitted by:

GenOn Marsh Landing, LLC

Prepared by:

URS Corporation

May 2012

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ACRONYMS

AFC	Application for Certification
AFY	acre-feet per year
ACR	annual compliance report
ATC	Authority to Construct
BAAQMD	Bay Area Air Quality Management District
CCGS	Contra Costa Generating Station
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEC	California Energy Commission
CPM	Compliance Project Manager
CTG	combustion turbine generator
DDSD	Delta Diablo Sanitation District
DTSC	Department of Toxic Substances Control
EPC	Engineering, Procurement and Construction
gpm	gallons per minute
MLGS	Marsh Landing Generating Station
MW	megawatt
PTC	Permit to Construct
PTO	Permit to Operate
RWQCB	Regional Water Quality Control Board
U.S. EPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service

1.0 INTRODUCTION

In accordance with Title 20 California Code of Regulations Section 1769 (Section 1769), GenOn Marsh Landing, LLC (formerly known as Mirant Marsh Landing, LLC) (GenOn Marsh Landing) submits this petition for approval of changes to two conditions of certification applicable to the Marsh Landing Generating Station project (MLGS or project). In August 2010, the CEC issued the Commission Decision approving the MLGS, adopted in Order No. 10-0825-03 in Docket 08-AFC-3C (Commission Decision). The Bay Area Air Quality Management District (BAAQMD) issued the Authority to Construct (ATC) for the MLGS in August 2010. As approved in the Commission Decision and the ATC, the MLGS is a nominal 760-megawatt (MW) electricity generating facility consisting of four simple cycle natural gas-fired combustion turbines.

GenOn Marsh Landing has identified the need for changes to two conditions of certification adopted in the Commission Decision. First, it is necessary to modify Condition of Certification Soil & Water-6 to allow flexibility regarding its requirement to “maintain the facilities necessary to obtain brackish groundwater as a backup water supply,” which GenOn Marsh Landing interprets to require the installation of the two Commission-approved groundwater wells prior to operation of the MLGS. As explained in Section 2.1 below, GenOn Marsh Landing determined that the City of Antioch water supply and onsite water storage facilities are sufficiently reliable to obviate the need to prospectively install and maintain the groundwater wells; instead, GenOn Marsh Landing proposes to make the installation of the wells optional so that they may be installed in the future if necessary to meet project requirements. Additionally, a deferral of the installation of the groundwater wells will help to allay concerns raised by the neighboring landowner and the Department of Toxic Substances Control (DTSC) and Central Valley Regional Water Quality Control Board (RWQCB) about the possibility that groundwater pumping during project operations could cause existing groundwater contamination underlying a neighboring site to migrate into unaffected areas. Modifying Condition of Certification Soil & Water-6 to clarify that the installation of the wells is not mandatory prior to operation will allow GenOn Marsh Landing to delay their installation and consequently allow more time for the neighboring landowner to undertake remediation of its underlying groundwater contamination under the oversight of the DTSC and RWQCB.

Second, it is also necessary to modify Condition of Certification BIO-8, which requires the project owner to make annual mitigation payments to an organization that will direct the money for use in mitigating the potential MLGS-specific and cumulative impacts of nitrogen deposition on sensitive species at the Antioch Dunes National Wildlife Refuge. Since the Commission Decision was issued, GenOn Marsh Landing has engaged in discussions with the U.S. Fish and Wildlife Service (USFWS) regarding the use and direction of the mitigation payments. The USFWS has requested that the mitigation payments be sent to a different organization than the one specified in Condition of Certification BIO-8, and has requested additional, minor changes regarding the activities for which the funding is intended to be used. GenOn Marsh Landing does not object to these changes and agreed to seek Commission approval for them. USFWS has previewed the proposed revisions to BIO-8 and has agreed that they are appropriate. [See correspondence with USFWS provided in Appendix A]

As stated above, this petition is submitted in accordance with Section 1769. Section 1769 specifies that after the final decision approving a project is effective, the applicant must file with the CEC a petition for any modifications it proposes to the project design, operation, or performance requirements. Section 1769 specifies that the petition must contain the following information:

- (A) *A complete description of the proposed modifications, including new language for any conditions that will be affected.*

Section 2.0 below provides a complete description of the requested changes to Condition of Certification Soil & Water-6 and Condition of Certification BIO-8.

- (B) *A discussion of the necessity for the proposed modifications.*

The need for the changes to Condition of Certification Soil & Water-6 and Condition of Certification BIO-8 is summarized above and discussed in more detail in Section 2 below.

- (C) *If the modification is based on information that was known by the petitioner during the certification proceeding, an explanation why the issue was not raised at that time.*

The need for the change to Condition of Certification Soil & Water-6 was not known until after GenOn Marsh Landing had secured City of Antioch water as the primary project water supply and determined that it was not necessary from a reliability perspective to prospectively install the groundwater wells, and after GenOn Marsh Landing was contacted regarding the neighboring remediation project and the concerns of DTSC and the RWQCB about groundwater pumping during project operations. The need for the change to Condition of Certification BIO-8 was not known until after the Commission Decision was issued and GenOn Marsh Landing engaged in discussions with USFWS regarding the potential use and direction of the funds designated for mitigation of the nonnative plants.

- (D) *If the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, an explanation of why the change should be permitted.*

The changes to the Conditions of Certification do not materially change or undermine the assumptions, rationale, findings, or other bases of the final decision.

- (E) *An analysis of the impacts the modification may have on the environment and proposed measures to mitigate any significant adverse impacts.*

The changes to the Conditions of Certification will not have any adverse impacts on the environment, and no measures beyond those already included in the existing Conditions of Certification are required.

- (F) *A discussion of the impact of the modifications on the facility's ability to comply with applicable laws, ordinances, regulations, and standards.*

The requested changes to Condition of Certification Soil & Water-6 and Condition of Certification BIO-8 will not affect the project's ability to comply with applicable laws, ordinances, regulations, and standards.

- (G) *A discussion of how the modification affects the public.*

The requested changes to Condition of Certification Soil & Water-6 and Condition of Certification BIO-8 will not have any material adverse effect on the public.

- (H) *A list of property owners potentially affected by the modification.*

The requested changes to Condition of Certification Soil & Water-6 and Condition of Certification BIO-8 will not have any material adverse effect on any property owners. The list of property owners within 1,000 feet of the project is included in Appendix B. The list has been newly compiled for this petition to reflect data currently available in the public land records.

- (1) *A discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings.*

Neither the project design refinements nor the requested changes to Condition of Certification Soil & Water-6 and Condition of Certification BIO-8 will have a material adverse effect on nearby property owners, the public or the parties to the application proceeding.

GenOn Marsh Landing is seeking changes to Condition of Certification Soil & Water-6 and Condition of Certification BIO-8. These changes require Commission approval under Section 1769.

2.0 CHANGES TO CONDITIONS OF CERTIFICATION SOIL AND WATER-6 AND BIO-8

GenOn Marsh Landing has identified the need for changes to two conditions of certification adopted in the Commission Decision.

2.1 SOIL AND WATER-6

GenOn Marsh Landing has identified the need for one change to Condition of Certification Soil & Water 6. As approved in the Commission Decision, the MLGS will use a maximum of 50 acre-feet per year (AFY) of water to serve process water requirements. Specifically, the MLGS will use water in the combustion turbine generator (CTG) inlet air evaporative coolers and for service water and other industrial purposes. The inlet air evaporative coolers use a relatively small amount of water to reduce the temperature of the ambient air as it enters the combustion turbines to improve power output and efficiency.

The Commission Decision approved two water sources for process water use at the MLGS: (1) brackish groundwater supplied by two wells to be installed on the existing Contra Costa Generating Station (CCGS) site, which was approved as the “primary” source of process water; and (2) municipal water supplied by the City of Antioch (City Water), which was approved as an “alternate primary” source of process water. The MLGS as approved in the Commission Decision includes the facilities needed to obtain water from both sources, namely two new groundwater wells and a pipeline to supply brackish groundwater to the MLGS, and a new connection to an existing potable water supply line to obtain City Water.

Condition of Certification Soil & Water-6 states that GenOn Marsh Landing may provide evidence to the CEC’s Compliance Project Manager (CPM) showing that the use of brackish groundwater is not feasible, which may be based on technical feasibility and/or project economics. Once that demonstration is made to the CPM’s satisfaction, the Commission Decision allows the MLGS to switch to the use of City Water as the primary source of process water. In August 2011, GenOn Marsh Landing submitted the documentation required by Condition of Certification Soil & Water-6 demonstrating that the use of groundwater is not feasible based on project economics. The CPM reviewed the documentation and approved the change in primary water source. With this approval, the MLGS has officially switched to the use of City Water as the primary source of process water.

Notwithstanding the switch to City Water as the primary source of process water, Condition of Certification Soil & Water-6 can be read to require the project owner also to “maintain the facilities necessary to obtain brackish groundwater as a backup water supply.” This would necessitate installing and maintaining the groundwater wells on the adjacent CCGS site in advance of commencing operations.

Consistent with this interpretation, GenOn Marsh Landing has been prepared to install the groundwater wells since early last year. However, GenOn Marsh Landing has determined that the installation of the wells can be delayed without diminishing the reliability of the project. The City of Antioch has a proven track record of providing highly reliable water service to its customers, so there is a very low probability of a material

disruption in the supply of City Water to the MLGS. In the unlikely event that the supply of City Water were interrupted, the MLGS will include sufficient onsite storage capability to allow the project to operate for approximately 8 days during the hottest time of the year. Accordingly, it is not necessary from a reliability perspective to prospectively install the groundwater wells in advance of commencing operations. Therefore, GenOn Marsh Landing seeks to modify Condition of Certification Soil and Water-6 so that it allows, rather than requires, the project owner to maintain the facilities (i.e., the groundwater production wells) needed to utilize brackish groundwater as a backup source.

Additionally, GenOn Marsh Landing was made aware of concerns expressed by DTSC and the Central Valley RWQCB regarding potential impacts from groundwater pumping at the MLGS wells on existing groundwater contamination underlying the neighboring site. The owner of the neighboring site is in the process of undertaking voluntary cleanup activities for this contamination under the oversight of DTSC and the RWQCB. DTSC and the RWQCB have raised concerns regarding the potential for groundwater pumping at the MLGS wells during project operation to cause the contaminated groundwater underlying the adjacent property to migrate into currently unaffected areas. Based on the reliability conclusions described above regarding the City Water supply, GenOn Marsh Landing is willing to delay installation of the groundwater wells. Modifying Condition of Certification Soil & Water-6 to make the installation of the wells optional rather than mandatory would allow more time to address the agencies' concerns, or potentially to avoid them altogether. Based on this analysis, it may be possible to delay installation of the wells indefinitely, thereby avoiding the concerns expressed by DTSC and the RWQCB entirely.

If, however, the reliability of City Water were to decline in the future, or if other considerations show that the groundwater wells are needed, it is important for the project owner to retain the ability to install the groundwater wells at a later time. Accordingly, GenOn Marsh Landing requests approval for a minor, straightforward modification to Condition of Certification Soil & Water-6 to replace the word "shall" with "may" in the provision regarding the maintenance of facilities to obtain brackish groundwater and otherwise leave the Condition of Certification unchanged.

For these reasons, GenOn Marsh Landing requests approval to modify Condition of Certification Soil & Water-6 as follows, with changes shown in strikethrough and underlined text:

SOIL & WATER-6: Prior to the use of groundwater or potable water for operation of the MLGS, the project owner shall install and maintain metering devices as part of the water supply and distribution system to monitor and record in gallons per day the volume of groundwater and potable water supplied to the MLGS. The metering devices shall be operational for the life of the project. An annual summary of daily water use by the MLGS, differentiating between groundwater, potable water, and recycled water (if applicable) shall be submitted to the CPM in the annual compliance report. Process water use shall not exceed 50 AFY from any source. Water supplied to MLGS shall be used for evaporative cooler makeup, service water, and water for combustion turbine washes and meet the following condition:

The primary MLGS water source shall be brackish groundwater. Once annually, the project owner shall sample groundwater quality at both pumping wells. The project owner shall treat plant wastewater (effluent) to meet Delta Diablo Sanitation District's (DDSD's) discharge requirements or implement zero liquid discharge technologies to manage the plant's process wastewater. Laboratory test results from the groundwater quality sample and the effluent sample, shall be submitted to the CPM in the annual compliance report.

Prior to installing a connection to the City of Antioch water supply system for an alternative source, the project owner shall provide evidence to the CPM that City has agreed to supply emergency backup water to the project in sufficient quantities to meet the project's needs at a flow rate comparable with the flow rate provided by one onsite well. For the purpose of this condition, the term emergency shall mean the operation and/or emergency issues that arise with the two proposed wells or with mobile

water filtration and ion exchange trailers, or the permanent water treatment plant. The City's supply must provide access to a quantity sufficient to meet MLGS demand due to Acts of God, natural disaster and other circumstances beyond the control of the project owner and it is necessary for the MLGS to continue to operate at peaking load capacity. Any connection to a water supply line shall be properly metered throughout the period of time of the emergency.

The project owner may provide evidence to the CPM that the water source described above is not feasible. Such evidence may be based on technical feasibility and/or project economics. The project owner, at the recommendation of the CPM, shall identify a primary alternative water supply as described herein: The primary alternative MLGS water source shall be City of Antioch fresh water supply. No more than 50 acre-feet of fresh water shall be supplied annually. The project owner shall pay a fee equal to no more than \$1,000 per acre-foot of City of Antioch water consumed annually (potable water for personnel consumption, eyewash stations, showers, and sanitary needs not included) to City of Antioch's water conservation program to implement new water conservation measures.

The water conservation program may change with CPM approval. A payment of \$15,000 shall be made to the City to offset fresh water used for construction and initiate the water conservation program. Water conservation fees are not required for use of recycled water during construction or operation. The project owner may ~~shall~~ maintain the facilities necessary to obtain brackish groundwater as a backup water supply. Brackish groundwater or recycled water (when feasible) may be used to supplement the fresh water sources.

Verification: At least 60 days prior to use of any water source for MLGS operation, the project owner shall:

1. submit to the CPM evidence that metering devices have been installed and are operational on the groundwater wells, potable water and recycled water (if applicable) pipelines serving the project, and
2. provide a report on the servicing, testing, and calibration of the metering devices in the annual compliance report.

The project owner shall submit copies to the CPM of all correspondence between the project owner and the City of Antioch regarding alternative sources of water within 10 days of its receipt or submittal. No later than 30 days prior to installing a connection to the City of Antioch potable water main, the project owner shall submit to the CPM evidence that water meters have been installed and are operational. The project shall also provide proof that the City can deliver alternative water to the MLGS in the event of an emergency water interruption at a flow rate comparable with the flow rate provided by one onsite well, up to 420-gpm.

The project owner shall submit a water use summary report to the CPM in the annual compliance report for the life of the project. The annual summary report shall be based on and shall distinguish recorded daily groundwater, potable water, and recycled water (if applicable) use. Included in the annual summary of water use, the project owner shall submit copies of meter records from the City of Antioch documenting the volume of potable water supplied over the previous year. Water supplied to MLGS as an emergency or alternative primary source of water from the City of Antioch shall be reported separately. The report shall include calculated monthly range, monthly average, and annual use by the project in acre-feet. After the first year and for subsequent years, this information shall also include the yearly range and yearly average groundwater, potable water and recycled water used by the project. The Annual Compliance Report (ACR) shall include the brackish groundwater sample laboratory test results during years when groundwater use is reported.

The project owner shall provide proof that the initial water conservation fee of \$15,000 was paid to the City of Antioch prior to site operations. Annual use payments shall be determined at the rate of \$1,000 per acre-foot of fresh water reported annually in the ACR. Annual use payments to a water conservation program, confirmed by the CPM, shall be made no later than 60 days following CPM approval of the ACR. The project owner shall provide data or information to the CPM describing the water conservation program with estimates of the annual water saved in acre-feet in the subsequent ACR.

2.2 BIO-8

GenOn Marsh Landing has identified the need for one change to Condition of Certification BIO-8. As adopted in the Commission Decision, Condition of Certification BIO-8 provides for the project owner to make an annual mitigation payment designed to assist in noxious weed management at the Antioch Dunes National Wildlife Refuge. These funds were intended to be used to manage the growth of nonnative plants that outcompete native plants that are the sole food source for the endangered Lange's metalmark butterfly. As adopted in the Commission Decision, Condition of Certification BIO-8 requires the payments to be made to Friends of San Pablo Bay, and earmarks the funds for assistance in "noxious weed management."

Since the Commission Decision was issued, GenOn has met with USFWS to discuss the details for disbursing and utilizing the annual mitigation payments provided for in Condition of Certification BIO-8. USFWS personnel have requested that the payments be made to the California Wildlife Foundation in lieu of the Friends of San Pablo Bay. USFWS personnel also have requested that the funds be authorized and directed for use in activities in addition to "weed management" that would be beneficial to native habitat and species at the refuge. These include captive breeding and release programs, and propagation and transplantation of the appropriate native plants. Finally, whereas Condition of Certification BIO-8 does not require the annual mitigation payments to be made until the project commences operating, GenOn Marsh Landing has voluntarily agreed to make annual payments while the project is under construction. (In fact, following discussions with USFWS, GenOn Marsh Landing voluntarily made an annual payment to the California Wildlife Foundation for calendar year 2011.)

GenOn Marsh Landing has agreed to accept the changes requested by and discussed with USFWS and asks the Commission to approve them. Below are the changes to Condition of Certification BIO-8 that have been agreed to by GenOn Marsh Landing and USFWS personnel, as indicated in underline/strikeout:

BIO-8 The project owner shall provide an annual payment to ~~Friends of San Pablo Bay~~ the California Wildlife Foundation or other third party approved by USFWS to assist in noxious weed management and other activities that benefit native habitat and species at the Antioch Dunes National Wildlife Refuge. Management activities funded may include but are not limited to: captive breeding and release of Lange's metalmark butterfly; propagation and transplantation of naked-stem buckwheat, Contra Costa wallflower, and Antioch Dunes evening primrose; noxious weed eradication using grazing animals, hand tools and/or appropriate mechanical equipment. The first annual payment shall be at least equal to \$2,805.00.

Each subsequent annual payment as calculated above shall be adjusted for inflation in accordance with the Employment Cost Index – West or its successor, as reported by the U.S. Department of Labor's Bureau of Labor Statistics. Payment shall be made annually for the duration of project operation.

The project owner has voluntarily offered to contribute additional annual funding for weed management ~~efforts~~ and other activities that benefit native habitat and species at the Antioch Dunes National Wildlife Refuge in an amount equal to \$20,000 per year and has agreed to include that additional payment as a requirement in this condition of certification. The additional annual payment shall be made at the same time as the annual payment specified above and shall be made for the

duration of project operation, but shall not be adjusted for inflation. The project owner has also voluntarily offered to contribute the annual payment, as well as the additional \$20,000 payment, in advance of operation, by June 30 of each year, beginning in 2012, until the year in which project operations begins.

Verification: No later than 30 days following the start of project operation, the project owner shall provide written verification to the CPM, USFWS, and CDFG that the first-annual payment was made to the ~~Friends of San Pablo Bay~~ California Wildlife Foundation or other third party approved by USFWS in accordance with this condition of certification. The project owner shall provide evidence that it has specified that its annual payment to ~~Friends of San Pablo Bay~~ can be used only to assist in noxious weed management and activities to support continued survival of Lange's metalmark butterfly, Contra Costa wallflower, and Antioch Dunes evening primrose at the Antioch Dunes National Wildlife Refuge as directed by the USFWS.

Thereafter, within 30 days after each anniversary date of the commencement of project operation, the project owner shall provide written verification to the CPM, USFWS, and CDFG that payment has been made to the ~~Friends of San Pablo Bay~~ in accordance with this condition of certification. This verification shall be provided annually for the operating life of the project. The project owner also shall request an annual report from the California Wildlife Foundation or other third-party approved by USFWS ~~Friends of San Pablo Bay~~ documenting how each annual payment required hereunder was used and applied to assist in noxious weed management and other management activities at the Antioch Dunes National Wildlife Refuge. The project owner shall provide copies of such reports to the CPM within thirty (30) days after receipt.

3.0 REFERENCES

BAAQMD (Bay Area Air Quality Management District), 2010. Authority to Construct. August.

CEC (California Energy Commission), 2010. Revised Staff Assessment, Marsh Landing Generating Station. June.

CEC (California Energy Commission), 2010. Commission Decision, Marsh Landing Generating Station. August.

URS (URS Corporation), 2008. Application for Certification. Marsh Landing Generating Station. May.

URS (URS Corporation), 2009. Application for Certification Amendment. Marsh Landing Generating Station. September.

**APPENDIX A
CORRESPONDENCE WITH USFWS**

APPENDIX A
CORRESPONDENCE WITH USFWS

From: <Stephanie_Jentsch@fws.gov>
Date: May 11, 2012 8:33:26 AM PDT
To: <elizabeth.lake@hklaw.com>
Cc: <Cay_Goude@fws.gov>, <Peter.Landreth@genon.com>, <Ryan_Olah@fws.gov>
Subject: Re: FW: BIO-8 blackline

Betsy,

The edits to the text below look good. Thank you for confirming.

Stephanie

Stephanie Jentsch
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W-2605
Sacramento, CA 95825
(916) 414-6496

<elizabeth.lake@hklaw.com>

05/10/2012 09:31 AM

To <Stephanie_Jentsch@fws.gov>
cc <Peter.Landreth@genon.com>, <Ryan_Olah@fws.gov>,
<Cay_Goude@fws.gov>
Subject FW: BIO-8 blackline

Stephanie, thank you for arranging the call with Cay and Ryan. As discussed, here is the CEC mitigation measure with redlining showing the proposed changes that will proceed with the amendment. Please confirm that this language meets with FWS approval, so we can confirm with the CEC.

BIO-8 The project owner shall provide an annual payment to ~~Friends of San Pablo Bay~~ the California Wildlife Foundation or other third party approved by USFWS to assist in noxious weed management and other activities that benefit native habitat and species at the Antioch Dunes National Wildlife Refuge. Management activities funded may include but are not limited to: captive breeding and release of Lange's metalmark butterfly; propagation and transplanted of naked-stem buckwheat, Contra Costa wallflower, and Antioch Dunes evening primrose; noxious weed eradication using grazing animals, hand tools and/or appropriate mechanical equipment. The first annual payment shall be at least equal to \$2,805.00. Each subsequent annual payment as calculated above shall be adjusted for inflation in accordance with the Employment Cost Index – West or its successor, as reported by the U.S. Department of Labor's Bureau of Labor Statistics. Payment shall be made annually for the duration of project operation. The project owner has voluntarily offered to contribute additional annual funding for weed management ~~efforts~~ and other activities that benefit native habitat and species at the Antioch Dunes National Wildlife Refuge in an amount equal to \$20,000 per year and has agreed to include that additional payment as a requirement in this condition of certification. The additional annual payment shall be made at the same time as the annual payment specified above and shall be made for the duration of project operation, but shall not be adjusted for inflation. The project owner has also voluntarily offered to contribute the annual payment, as well as the additional \$20,000 payment, in advance of operation, by June 30 of each year, beginning in 2012, until the year in which project operations begins.

Verification: No later than 30 days following the start of project operation, the project owner shall provide written verification to the CPM, USFWS, and CDFG that the first-annual payment was made to the ~~Friends of San Pablo Bay~~ California Wildlife Foundation or other third party approved by USFWS in accordance with this condition of certification. The project owner shall provide evidence that it has specified that its annual payment ~~to Friends of San Pablo Bay~~ can be used only to assist in noxious weed management and activities to support continued survival of Lange's metalmark butterfly, Contra Costa wallflower, and Antioch Dunes evening primrose at the Antioch Dunes National Wildlife Refuge as directed by the USFWS.

Thereafter, within 30 days after each anniversary date of the commencement of project operation, the project owner shall provide written verification to the CPM, USFWS, and CDFG that payment has been made ~~to the Friends of San Pablo Bay~~ in accordance with this condition of certification. This verification shall be provided annually for the operating life of the project. The project owner also shall request an annual report from the California Wildlife Foundation or other third-party approved by USFWS ~~Friends of San Pablo Bay~~ documenting how each annual payment required hereunder was used and applied to assist in noxious weed management and other management activities at the Antioch Dunes National Wildlife Refuge. The project owner shall provide copies of such reports to the CPM within thirty (30) days after receipt.

APPENDIX B
LIST OF PROPERTY OWNERS

Assessor's Parcel Numbers/Ownership Information
Property Within 1,000 Feet of the MLGS Project Site

APN	Owner Name	Address	City	State	Zip Code
051-031-005-5	FORESTAR (USA) REAL ESTATE C/O DENISE E ORSBORN	6300 BEE CAVE RD RD BLDG 2-500	AUSTIN	TX	78746
051-031-015-4	PACIFIC GAS & ELECTRIC CO C/O TAX DEPT B8E	PO BOX 770000	SAN FRANCISCO	CA	94177
051-031-016-2	PACIFIC GAS & ELECTRIC CO C/O SUPERVISOR OF HYDRO SUPPORT	5555 FLORIN PERKINS RD	SACRAMENTO	CA	95826
051-031-018-8	GenOn DELTA LLC C/O RICHARD LAI	1350 TREAT BLVD #500	WALNUT CREEK	CA	94597
051-031-019-6	GenOn DELTA LLC C/O RICHARD LAI	1350 TREAT BLVD #500	WALNUT CREEK	CA	94597
051-032-004-7	TONY CUTINO C/O FRANK BELLECCI	4030 ST MARYS ST	MARTINEZ	CA	94553
051-032-005-4	TONY CUTINO C/O FRANK BELLECCI	4030 ST MARYS ST	MARTINEZ	CA	94553
051-032-006-2	TONY CUTINO C/O FRANK BELLECCI	4030 ST MARYS ST	MARTINEZ	CA	94553
051-032-007-0	TONY CUTINO C/O FRANK BELLECCI	4030 ST MARYS ST	MARTINEZ	CA	94553
051-032-008-8	PACIFIC GAS & ELECTRIC CO	PO BOX 770000	SAN FRANCISCO	CA	94177
051-032-011-2	JOHN A AND LANA S MARTINEZ	3904 CAPLES CT	ANTIOCH	CA	94531
051-032-013-8	RANDY W AND CANI L TRE CHRIST	PO BOX 1163	BRENTWOOD	CA	94513
051-040-019-5	INTEREST INCOME PARTNERS	PO BOX 11087	SAN RAFAEL	CA	94912
051-040-073-2	KIEWIT CONSTRUCTION GROUP INC	1000 KIEWIT PLZ	OMAHA	NE	68131
051-051-019-1	FRANK C SR AND HELEN TRE ALEGRE	1140 VIENNA DR	LODI	CA	95242
051-051-021-7	GWFF POWER SYSTEMS COMPANY C/O CATHERINE L EDWARDS	4300 RAILROAD AVE	PITTSBURG	CA	94565
051-052-007-5	FRANK D & JO ANN TRE EVANGELHO	897 OAK PARK BLVD	PISMO BEACH	CA	93449
051-052-008-3	CITY OF ANTIOCH C/O CITY CLERK	PO BOX 5007	ANTIOCH	CA	94531
051-052-053-9	SANDY LANE PROPERTIES C/O NORMA J GONSALVES	361 SANDY LN	OAKLEY	CA	94561
051-052-056-2	FORESTAR (USA) REAL ESTATE C/O DENISE E ORSBORN	6300 BEE CAVE RD	AUSTIN	TX	78746
051-052-110-7	ROBERT C MARKSTEIN FLP C/O ROBERT MARKSTEIN	1645 DRIVE IN WAY	ANTIOCH	CA	94509
051-250-001-8	STATE OF CALIFORNIA	7791 RINCON ANNEX	SAN FRANCISCO	CA	94120
705-103-001-8	NORMA JEAN GONSALVES	361 SANDY LN	OAKLEY	CA	94561
Source: Contra Costa County Assessor, January 19, 2012					