

DOCKETED

Docket Number:	12-AFC-02C
Project Title:	Huntington Beach Energy Project - Compliance
TN #:	271587
Document Title:	Petition to Amend for Sewer Interconnection Upgrades
Description:	N/A
Filer:	Benjamin Morgan
Organization:	AES
Submitter Role:	Applicant
Submission Date:	7/22/2026 2:47:03 PM
Docketed Date:	7/22/2026



Petition for Post-Certification Amendment

Sewer Interconnection Upgrades

For the

Huntington Beach Energy Project

Huntington Beach, California

(12-AFC-02C)

Submitted to the:

California Energy Commission

Submitted by:

AES Huntington Beach Energy, LLC

With Technical Assistance by:

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Version No: Final

Document No: 260709092403_ada468ac

July 21, 2026

Executive Summary

AES Huntington Beach Energy, LLC (AES or the Project Owner) is submitting this petition to the California Energy Commission (CEC) for post-certification license modification for the Huntington Beach Energy Project (HBEP) (12-AFC-02C). As currently constructed, HBEP consists of a combined cycle gas turbine (CCGT) power block that includes unfired heat recovery steam generators (HRSGs), a condensing steam turbine generator (STG), an air-cooled condenser (ACC), and ancillary facilities. To facilitate startup of the CCGT power block, HBEP also includes an auxiliary boiler. HBEP's CCGT power block is located entirely within the existing Huntington Beach Generating Station (HBGS), an operational power plant owned by AES Corporation.

This petition for post-certification license amendment (Petition to Amend [PTA]) proposes to reroute process wastewater discharges currently flowing to the Pacific Ocean to the sanitary sewer via a new interconnection with the Orange County Sanitation District (OCSD). Stormwater will continue to discharge to the Pacific Ocean. Project activities include the following, all of which will occur entirely within the HBGS property:

- Construction of a new wastewater force main,
- Construction of a new wastewater pumping station,
- Reroute of an existing stormwater force main,
- Installation of a floating basin cover on an existing basin, and
- Modifications to onsite piping to prevent rainwater ingress into the wastewater system.

No other changes to the HBGS site or the HBEP equipment or operations are proposed.

To analyze potential environmental effects, an environmental impacts assessment is presented in Section 3. The assessment concludes that there will be no significant environmental impacts associated with the implementation of the actions specified in this PTA and that the project, as modified, will continue to comply with all applicable laws, ordinances, regulations, and standards (LORS).

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Acronyms and Abbreviations

ACC	air-cooled condenser
AES	AES Huntington Beach Energy, LLC
AFC	Application for Certification
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CCGT	combined cycle gas turbine
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
COC	Conditions of Certification
DPM	diesel particulate matter
EPA	U.S. Environmental Protection Agency
GE	General Electric
GHG	greenhouse gas
H ₂ S	hydrogen sulfide
HBEP	Huntington Beach Energy Project
HBGS	Huntington Beach Generating Station
HRS	heat recovery steam generator
lb/day	pound(s) per day
LORS	laws, ordinances, regulations, and standards
MT/year	metric ton(s) per year
N/A	not applicable
NAAQS	National Ambient Air Quality Standards
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System

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OCSD	Orange County Sanitation District
OEHHA	Office of Environmental Health Hazard Assessment
PM _{2.5}	particulate matter with an aerodynamic diameter of 2.5 microns or less
PM ₁₀	particulate matter with an aerodynamic diameter of 10 microns or less
PTA	Petition to Amend
SCAQMD	South Coast Air Quality Management District
SO ₂	sulfur dioxide
STG	steam turbine generator
VOC	volatile organic compounds

1. Introduction

1.1 Background

The CEC approved the HBEP Application for Certification (AFC) on October 29, 2014 (Final Decision) and the amendment request to the original license on April 12, 2017 (Final Amendment Decision).

The HBEP site is on the existing HBGS property owned by AES Corporation, located at 21730 Newland Street in the City of Huntington Beach, California, and occupies approximately 11 acres of the 37-acre HBGS site. With the Final Amendment Decision, the CEC analyzed HBEP's impacts for two General Electric (GE) Model 7FA.05 combustion turbines in a combined cycle configuration, two GE Model LMS100-PB combustion turbines in a simple cycle configuration, and an auxiliary boiler. HBEP's CCGTs began commercial operation in February 2020, along with the auxiliary boiler. Construction of the simple cycle gas turbines has yet to commence and is contingent on securing a power purchase agreement.

Since issuance of the Final Amendment Decision, the following post-certification changes have also been approved by the CEC:

- Modification of several commissioning parameters for the auxiliary boiler, approved in July 2019.
- Replacement of an approved architectural screening structure (spherical ball wall) with a mural-based design treatment for screening and enhancing views of the HBEP site, approved in April 2021.
- Increase of CCGT nitrogen oxides (NO_x) non-cold startup emissions limit from 17 pounds per event to 32 pounds per event for consistency with the South Coast Air Quality Management District's (SCAQMD) revised Title V Facility Permit, approved in August 2021.
- Remodel of the site entrance along Newland Street and installation of a new security guard shack, approved in October 2022.
- Increase of annual CCGT operating hours from 6,640 hours per unit per year (including startups and shutdowns) to 7,640 hours per unit per year (including startups and shutdowns) and modification of air emission limits commensurate with the modification of annual CCGT operating hours, approved in July 2023.

1.2 Overview of Proposed Amendments

This PTA addresses the potential environmental impacts associated with sewer interconnection upgrades at HBEP. The upgrades will allow process wastewater to be discharged to the sanitary sewer instead of the Pacific Ocean and will require the following:

- Construction of a new wastewater force main,
- Construction of a new wastewater pumping station,
- Reroute of an existing stormwater force main,
- Installation of a floating basin cover on an existing basin, and
- Modifications to onsite piping to prevent rainwater ingress into the wastewater system.

No other changes to the HBGS site or the HBEP equipment or operations are proposed.

A detailed description of the proposed modification is included in Section 2 and analyzed in Section 3.

This PTA contains all of the information that is required pursuant to the CEC's Siting Regulations (Title 20, California Code of Regulations [CCR], Section 1769, Post Certification Petition for Changes in Project Design, Operation or Performance and Amendments to the Commission Decision). The information necessary to fulfill the requirements of Section 1769 is contained in Sections 1 through 7, as summarized in Table 1.2-1.

Table 1.2-1. Informational Requirements for Post-Certification Modifications

Section 1769(a)(1) Requirements	Sections of PTA Fulfilling Requirements
(A) A complete description of the proposed change, including new language for any conditions of certification that will be affected;	Sections 1, 2, and 3
(B) A discussion of the necessity for the proposed change and an explanation of why the change should be permitted;	Sections 1.2, 1.3, and 3
(C) A description of any new information or change in circumstances that necessitated the change;	Sections 1.2, 1.3, and 3
(D) An analysis of the effects that the proposed change to the project may have on the environment and proposed measures to mitigate any significant environmental effects;	Sections 1.4 and 3
(E) An analysis of how the proposed change would affect the project's compliance with applicable laws, ordinances, regulations, and standards;	Sections 1.5 and 3
(F) A discussion of how the proposed change would affect the public;	Sections 1, 3, and 4
(G) A list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of any affected project linears and 1,000 feet of the project site;	Section 5
(H) A discussion of the potential effect of the proposed change on nearby property owners, residents, and the public; and	Sections 3, 4, and 6
(I) A discussion of any exemptions from the California Environmental Quality Act, commencing with Section 21000 of the Public Resources Code, that the project owner believes may apply to approval of the proposed change.	Section 7

1.3 Necessity of Proposed Changes, an Explanation of Why it Should Be Permitted, and a Description of New Information or Change in Circumstances

The CEC Siting Regulations require a discussion of the necessity for the proposed revisions to the HBEP Certification, an explanation of why the change should be permitted, and a description of any new information or change in circumstances that necessitated the change (Title 20, CCR, Sections 1769(a)(1)(B) and (C)). The change to reroute HBEP's process wastewater discharges to the sanitary sewer is necessary as it will aid in complying with the facility's outfall discharge permit limits and minimize potential pollution to the Pacific Ocean. In addition, piping modifications to exclude rainwater ingress into the wastewater system brings HBEP into compliance with the requirements of OCSD's Wastewater Ordinance (OCSD-53), which prohibits discharge of stormwater into OCSD facilities. This PTA further discusses why the change should be allowed.

1.4 Summary of Potential Environmental Effects and Proposed Mitigation Measures

The CEC Siting Regulations require an analysis of the effects that the proposed change to the project may have on the environment and proposed measures to mitigate any significant environmental effect (Title 20, CCR, Section 1769(a)(1)(D)). Section 3 of this PTA includes a discussion of the potential environmental impacts associated with the modification as well as a discussion of the consistency of the modification with applicable LORS. Section 3 concludes that there will be no significant, unmitigated environmental impacts associated with implementing the actions specified in this PTA and that the project, as modified, will comply with all applicable LORS. As such, no new or additional mitigation measures are proposed as part of this PTA.

1.5 Consistency of Changes with Applicable LORS

The CEC Siting Regulations require an analysis of how the proposed change would affect the project's compliance with applicable LORS (Title 20, CCR, Section 1769(a)(1)(E)). The proposed project modification is consistent with applicable LORS, as discussed in Section 3. The proposed project change will eliminate HBEP's process wastewater discharges to the Pacific Ocean while preventing stormwater discharges to the sanitary sewer in accordance with OCSD's Wastewater Ordinance (OCSD-53).

2. Description of Proposed Amendments

This section includes a description of the proposed project modification, consistent with CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(A)).

Currently, HBEP discharges its process wastewater to the Pacific Ocean along with stormwater runoff. This project will reroute HBEP's process wastewater discharges currently flowing to the Pacific Ocean to the sanitary sewer via a new interconnection to the OCSD. Process wastewater flows include reverse osmosis reject, steam system blowdown, evaporative cooler blowdown, and plant/equipment drains.

The project will involve construction of a new wastewater force main, wastewater pumping station, and a floating basin cover (to be installed on an existing basin). The force main will connect to an existing sewer lateral owned by AES at the southeast corner of the HBGS property. The project will also include piping modifications to exclude rainwater ingress into the wastewater system from the site's storm drain system, transformer containments, ammonia storage tank containment, and STG drains tank sump. Construction activities will not extend outside of the HBGS boundary. Attachment 2.1 includes the civil design drawings for the proposed sewage line construction.

At the completion of the project, HBEP will no longer discharge process wastewater to the Pacific Ocean; process wastewater will instead be discharged via a Class I Wastewater Discharge Permit with the OCSD. AES has been in communication with OCSD about these changes and, pursuant to OCSD's guidance, will submit an application for a Class I Wastewater Discharge Permit between 2 and 6 months prior to the anticipated start of wastewater discharge. OCSD has indicated that their trunkline has sufficient capacity to accept the planned discharge. Because OCSD's Wastewater Ordinance (OCSD-53 Section 203) prohibits the discharge of stormwater into OCSD facilities, HBEP will continue the discharge of stormwater to the Pacific Ocean under a National Pollution Discharge Elimination System (NPDES) permit.

The construction is expected to take up to 3 months (site preparation followed by excavation/construction) to complete. The work will be performed by a local contractor, requiring approximately 5 to 8 workers per week over the construction period.

Minimal ground disturbance, approximately 850 square feet, will be required for the new wastewater force main and wastewater pumping station and will be limited to hardscape removal, setting pipeline support foundations, and trenching for underground piping. Where necessary, existing asphaltic cement will be approximately 4 inches removed, the compacted road base will be removed for reuse, and the underlying soils recompact. The deepest expected excavations will be 16 feet below grade for the new sump pump well and 10 feet below grade for the bellhole to facilitate interconnection between the new wastewater pipeline and the existing AES sanitary sewer line leading to the OCSD trunkline. All other excavations range from 2.5 to 8 feet below grade for the stormwater and wastewater lines and pipeline support foundations. In total, approximately 210 cubic yards of soil will be excavated during the construction.

Based on the limited duration and extent of construction activity, only a limited number of Conditions of Certification (COCs) from the CEC's Final Decision and subsequent amendments are expected to be applicable during construction. These COCs are presented in Attachment 2.2 and will be implemented if required by the CEC's final decision of this PTA.

From an operational perspective, the proposed project will only change the location to which process wastewater is discharged. Therefore, only two COCs are expected to require modification because of the proposed project, as discussed in Section 3.

3. Environmental Analysis of Proposed Amendments

The following subsections present a discussion of the potential impacts that the proposed change may have on the environmental analysis as presented in applicable sections of the Final Decision and subsequent amendments. Each discussion includes an environmental analysis, an assessment of compliance with applicable LORS, proposed mitigation measures, and, if applicable, proposed changes to the COCs that are necessary as a result of the project modification.

3.1 Air Quality and Greenhouse Gases

3.1.1 Environmental Setting

The project is located in Orange County, which is within the SCAQMD's jurisdiction. The SCAQMD is the U.S. Environmental Protection Agency's (EPA) delegated authority to implement state and federal air quality regulations. The SCAQMD also monitors and reports the status of the area's air quality attainment of the California and National Ambient Air Quality Standards (CAAQS and NAAQS, respectively).

Table 3.1–1 presents the attainment status for Orange County.

Table 3.1-1. State and Federal Air Quality Designations for Orange County, California

Pollutant	State Designation	Federal Designation
Ozone	1-hour: Nonattainment 8-hour: Nonattainment	1-hour: N/A 8-hour: Nonattainment (Extreme)
CO	1-hour: Attainment 8-hour: Attainment	1-hour: Attainment (Serious Maintenance) 8-hour: Attainment (Serious Maintenance)
NO ₂	1-hour: Attainment Annual: Attainment	1-hour: Attainment (Maintenance) Annual: Attainment (Maintenance)
SO ₂	1-hour: Attainment 24-hour: Attainment	1-hour: Attainment 24-hour: N/A
PM ₁₀	24-hour: Nonattainment Annual: Nonattainment	24-hour: Attainment (Serious Maintenance) Annual: N/A
PM _{2.5}	24-hour: N/A Annual: Nonattainment	24-hour: Nonattainment (Serious) Annual: Nonattainment (Serious)
Lead	30-day: Attainment 3-month: N/A	30-day: N/A 3-month: Attainment
H ₂ S	1-hour: Attainment/Unclassified	1-hour: N/A
Visibility Reducing Particles	8-hour: Attainment/Unclassified	8-hour: N/A
Sulfates	24-hour: Attainment/Unclassified	24-hour: N/A
Vinyl Chloride	24-hour: Attainment/Unclassified	24-hour: N/A

Sources:

California Air Resources Board (CARB). 2026. "Maps of State and Federal Area Designations." Available online at: <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>. Accessed June 3, 2026.

U.S. Environmental Protection Agency (EPA). 2026. "Nonattainment Areas for Criteria Pollutants (Green Book)." Available online at: <https://www.epa.gov/green-book>. Accessed June 3, 2026.

Notes:

CO = carbon monoxide

H₂S = hydrogen sulfide

N/A = Not applicable (i.e., no standard)

NO₂ = nitrogen dioxide

PM_{2.5} = particulate matter with an aerodynamic diameter of 2.5 microns or less

PM₁₀ = particulate matter with an aerodynamic diameter of 10 microns or less

SO₂ = sulfur dioxide

3.1.2 Environmental Consequences

The proposed sewer interconnection upgrades will result in air quality and greenhouse gas (GHG) impacts due to the minimal construction activities. Emissions from construction were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.45. Model defaults were used unless otherwise noted below:

- Construction duration was assumed to be up to 3 months (12 weeks total), arbitrarily beginning January 4, 2027 and ending March 31, 2027.
- Project area of approximately 0.6 acres (24,015 square feet) was used based on Civil Drawings. This focuses on work conducted in the southwest area of the site where ground disturbance activities will occur.
- Project characteristics were based on the site's location in Huntington Beach, Orange County, California.
- The following construction equipment list was based on the small size and nature of the project, and modified from the CalEEMod defaults:
 - Only one Tractor/Loader/Backhoe would be needed for site preparation activities
 - Only one Rubber Tired Dozer and two Tractors/Loaders/Backhoes would be needed for excavation/construction activities
- Assumed up to 210 cubic yards of soil or aggregate material would be excavated for offsite transport, with the same volume imported as backfill, during the excavation/construction phase.
- No areas are expected to be graded because the project area is mostly hardscaped and excavated areas will be restored to match current grade.
- The following construction vehicle list was based on the small size and nature of the project:
 - For the site preparation phase:
 - 5 workers per day (modeled as 10 one-way trips) with a default one-way commute distance of 18.5 miles
 - No material hauling trips
 - No vendor delivery trips
 - In addition, assumed 1 onsite truck (modeled as 2 one-way trips) traveling up to 1 mile each day (0.5-mile one-way trips)
 - For the excavation/construction phase:
 - Assumed a consistent crew of 8 workers per day (modeled as 16 one-way trips) with a default one-way commute distance of 18.5 miles
 - 1.23 material hauling one-way trips per day with a default one-way trip distance of 20 miles
 - 2 vendor delivery trucks per day (modeled as 4 one-way trips) with a default one-way trip distance of 10.2 miles; note that this includes one Concrete Truck per day to support foundation work
 - In addition, assumed 1 onsite truck (modeled as 2 one-way trips) traveling up to 1 mile each day (0.5-mile one-way trips)
- Project travel was assumed to occur entirely on paved roads.

The construction emissions are presented in Table 3.1-2, along with a comparison to the SCAQMD's California Environmental Quality Act (CEQA) significance thresholds; the CalEEMod report of results is included in Attachment 3.1. As shown in Table 3.1-2, project construction is not expected to result in a significant air quality or GHG impact as the construction emissions are estimated to be below the SCAQMD's CEQA significance thresholds.

Table 3.1-2. Summary of Construction Emissions

Pollutant	Significance Threshold	Project Construction Emissions ^a	Exceeds Threshold (Y/N)?
NO _x	100 lb/day	8 lb/day	N
VOC	75 lb/day	1 lb/day	N
PM ₁₀	150 lb/day	5 lb/day	N
PM _{2.5}	55 lb/day	3 lb/day	N
SO ₂	150 lb/day	< 1 lb/day	N
CO	550 lb/day	9 lb/day	N
CO ₂ e	10,000 MT/year	42 MT/year	N

Source: South Coast Air Quality Management District (SCAQMD). 2023. *SCAQMD Air Quality Significance Thresholds*. March. Available online at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>. Accessed June 2, 2026.

Notes:

CO₂e = carbon dioxide equivalent

lb/day = pound(s) per day

MT/year = metric ton(s) per year

VOC = volatile organic compounds

^a Project construction emissions presented are the maximum daily construction emissions for the entire project duration except for CO₂e emissions. CO₂e emissions presented are the total construction emissions; because project construction is expected to last only 12 weeks, annual emissions were assumed equal to the total project emissions. CalEEMod defaults which assumed no overlapping activity phases (e.g., site preparation followed by grading) were used.

The proposed modification will not alter the operation of HBEP's air emission sources. Therefore, no operational air quality or GHG impacts are expected.

3.1.3 Mitigation Measures

The proposed modification will not create a significant air quality or GHG impact and will not require additional mitigation measures. Furthermore, based on the small scope of work associated with the proposed modification, only AQ-SC1 and AQ-SC3 through AQ-SC5 of the existing construction COCs should be applicable to this project, as identified in Attachment 2.2.

3.1.4 Consistency with LORS

The proposed modification will comply with applicable LORS, with implementation of only a limited list of existing construction COCs.

3.1.5 Conditions of Certification

The proposed modification does not require changes to the COCs for air quality.

3.2 Biological Resources

3.2.1 Environmental Setting

This PTA does not require changes to the biological resources setting described in the Final Decision and subsequent amendments.

3.2.2 Environmental Consequence

No changes to habitat or physical disturbance of special-status species, natural or cropland vegetation, soils, wetlands, and vernal pools or vernal swales; interference with wildlife or aquatic species movement; or conflict with any local policies/ordinances or any approved/adopted conservation plans is expected as a result of the proposed modification. However, because even minimal ground disturbance is expected during construction, biological surveys and/or monitoring will be conducted, if required. Therefore, construction biological impacts are expected to be less than significant.

The proposed modification will not alter the operation of HBEP's air emission sources. Therefore, no operational biological resources impacts, specifically nitrogen deposition, are expected.

3.2.3 Mitigation Measures

The proposed modification will not create a significant biological resources impact and will not require additional mitigation measures. Furthermore, based on the small scope of work associated with the proposed modification, only BIO-2, BIO-4, BIO-5, BIO-7, and BIO-8 of the existing construction COCs should be applicable to this project, as identified in Attachment 2.2.

3.2.4 Consistency with LORS

The proposed modification will comply with applicable LORS, with implementation of only a limited list of existing construction COCs.

3.2.5 Conditions of Certification

The proposed modification does not require changes to the COCs for biological resources.

3.3 Cultural/Tribal Resources

3.3.1 Environmental Setting

This PTA does not require changes to the cultural/tribal resources setting described in the Final Decision and subsequent amendments.

3.3.2 Environmental Consequences

The deepest excavation associated with the proposed modification will be 16 feet below grade for the sump pump well foundation, measuring 13-feet by 13-feet. A 10-foot bellhole, measuring 10-feet by 10-feet, will also be excavated to establish the connection between the new wastewater pipeline and existing AES sanitary sewer line leading to the OCS trunkline. All other excavations range from 2.5 to 8 feet below grade for underground pipelines and pipeline support foundations. These excavations will take place in areas where there was ground disturbance during HBEP development, but at greater depths than previously incurred in these areas. Thus, the proposed modification has the potential to impact cultural/tribal resources during ground disturbance activities. Based on previous studies conducted for the HBEP site¹, the project area is expected to have low archaeological sensitivity; therefore, less-than-significant impacts to cultural/tribal resources are expected.

The proposed changes do not materially alter the physical appearance of the project, which could potentially impact nearby historic properties. Therefore, no operational cultural/tribal resources impacts are expected.

¹ Helton, Clint. 2016. *Cultural Resources Monitoring and Mitigation Plan, Huntington Beach Energy Project, Huntington Beach, Orange County, California (12-AFC-02C)*. Prepared for AES Southland Development, LLC. June.

3.3.3 Mitigation Measures

The proposed modification will not create a significant cultural/tribal resources impact and will not require additional mitigation measures. Furthermore, based on the depth of ground disturbances expected, CUL-1 through CUL-8 of the existing construction COCs should be applicable to this project, as identified in Attachment 2.2.

3.3.4 Consistency with LORS

The proposed modification will comply with applicable LORS, with implementation of existing construction COCs.

3.3.5 Conditions of Certification

The proposed modification does not require changes to the COCs for cultural/tribal resources.

3.4 Energy and Energy Resources

3.4.1 Environmental Setting

This PTA does not require changes to the energy and energy resources setting described in the Final Decision and subsequent amendments.

3.4.2 Environmental Consequences

The proposed modification will not result in potentially significant environmental impacts due to the wasteful, inefficient, or unnecessary consumption of energy resources. Construction will consume energy resources, but only on a temporary basis. Operation of the new wastewater pumping station will consume energy resources as needed to convey collected process wastewater to the sanitary sewer. However, energy consumption will be minimized to the extent feasible by using equipment that complies with existing efficiency standards. Therefore, less-than-significant impacts to energy or energy resources are expected.

3.4.3 Mitigation Measures

No significant energy or energy resources impacts are expected from the proposed modification. Therefore, no additional mitigation measures are required.

3.4.4 Consistency with LORS

The modified project conforms to applicable LORS related to energy and energy resources.

3.4.5 Conditions of Certification

The Final Decision and subsequent amendments did not include COCs for energy or energy resources and, as impacts are considered less than significant, none are required.

3.5 Geological and Paleontological Resources

3.5.1 Environmental Setting

This PTA does not require changes to the geological and paleontological resources setting described in the Final Decision and subsequent amendments.

3.5.2 Environmental Consequences

The deepest excavation associated with the proposed modification will be 16 feet below grade for the sump pump well foundation, measuring 13-feet by 13-feet. A 10-foot bellhole, measuring 10-feet by 10-feet, will also be excavated to establish the connection between the new wastewater pipelines and the existing AES sanitary sewer line leading to the OCSD trunkline. All other excavations range from 2.5 to 8 feet below grade for underground pipelines and pipeline support foundations. These excavations will take place in areas where there would have been ground disturbance during HBEP development, but at greater depths than previously incurred in these areas. Thus, the proposed modification has the potential to impact geological and paleontological resources during ground disturbance activities. Based on previous studies conducted for the HBEP site², the project area is expected to have low paleontological sensitivity; therefore, less-than-significant impacts to geological and paleontological resources are expected.

3.5.3 Mitigation Measures

The proposed modification will not create a significant geological and paleontological resources impact and will not require additional mitigation measures. Furthermore, based on the depth of ground disturbances expected and limited scope of work, PAL-5 through PAL-8 of the existing construction COCs should be applicable to this project, as identified in Attachment 2.2.

3.5.4 Consistency with LORS

The proposed modification will comply with applicable LORS, with implementation of existing construction COCs.

3.5.5 Conditions of Certification

The proposed modification does not require changes to the COCs for geological and paleontological resources.

3.6 Hazardous Materials Management

3.6.1 Environmental Setting

This PTA does not require changes to the hazardous materials management setting described in the Final Decision and subsequent amendments.

3.6.2 Environmental Consequences

The proposed modification will neither result in the use of a new construction or operational hazardous material onsite nor increase the approved amount of hazardous materials used. Therefore, no significant impacts to hazardous materials management are expected.

3.6.3 Mitigation Measures

No hazardous materials management impacts are expected from the proposed modification. Therefore, no additional mitigation measures are required.

² Verhoff, James. 2016. *Paleontological Resources Monitoring and Mitigation Plan, Huntington Beach Energy Project (12-AFC-02C), Condition of Certification PAL-3*. CH2M Hill, Inc., Santa Ana, CA.

3.6.4 Consistency with LORS

The modified project conforms to applicable LORS related to hazardous materials management.

3.6.5 Conditions of Certification

The proposed modification does not require changes to the COCs for hazardous materials management.

3.7 Land Use

3.7.1 Environmental Setting

This PTA does not require changes to the land use setting described in the Final Decision and subsequent amendments.

3.7.2 Environmental Consequences

The proposed modification does not physically divide an established community. The project change is consistent with existing land uses in the project vicinity, the policy for consistent land use designation/zoning district, and other applicable policies. Therefore, no impacts to land use are expected.

3.7.3 Mitigation Measures

No land use impacts are expected from the proposed modification. Therefore, no additional mitigation measures are required.

3.7.4 Consistency with LORS

The modified project conforms to applicable LORS related to land use.

3.7.5 Conditions of Certification

The proposed modification does not require changes to the COCs for land use.

3.8 Noise and Vibration

3.8.1 Environmental Setting

This PTA does not require changes to the noise and vibration setting described in the Final Decision and subsequent amendments.

3.8.2 Environmental Consequences

The proposed modification will not increase noise or vibration-producing activities at the site beyond those analyzed during the licensing of the HBEP. Therefore, the proposed modification will not alter the noise or vibration impacts of the project.

3.8.3 Mitigation Measures

The proposed modification will not create a significant noise and vibration impact and will not require additional mitigation measures.

3.8.4 Consistency with LORS

The modified project conforms to applicable LORS related to noise and vibration.

3.8.5 Conditions of Certification

The proposed modification does not require changes to the COCs for noise and vibration.

3.9 Public Health

3.9.1 Environmental Setting

This PTA does not require changes to the public health setting described in the Final Decision and subsequent amendments.

3.9.2 Environmental Consequences

The proposed sewer line upgrades will result in public health impacts due to the release of diesel particulate matter (DPM) emissions from diesel-fueled construction equipment and vehicles. However, given that construction will last only 2 to 3 months, potential public health impacts are expected to be short-term and less-than-significant. This is further supported by the fact that DPM's toxicity is based on long-term exposure. Consistent with the Office of Environmental Health Hazard Assessment's (OEHHA) recommendations³, a health risk assessment for this short-term project was not conducted as part of this analysis.

The proposed modification will not alter the operation of HBEP's air emission sources. Therefore, no operational public health impacts are expected.

3.9.3 Mitigation Measures

The proposed modification will result in less-than-significant impacts on public health. Therefore, no additional mitigation measures are required.

3.9.4 Consistency with LORS

The modified project conforms to applicable LORS related to public health.

3.9.5 Conditions of Certification

The Final Decision and subsequent amendments did not include COCs for public health and, as impacts are considered less than significant, none are required.

3.10 Socioeconomics

3.10.1 Environmental Setting

This PTA does not require changes to the socioeconomic setting described in the Final Decision and subsequent amendments.

³ Office of Environmental Health Hazard Assessment (OEHHA). 2015. *Air Toxics Hot Spots Program Guidance Manual*. February.

3.10.2 Environmental Consequences

The proposed modification will not alter the basis of the CEC's determination that HBEP will not have a significant impact on socioeconomics. Therefore, no significant socioeconomic impacts are expected.

3.10.3 Mitigation Measures

No socioeconomics impacts are expected from the proposed modification. Therefore, no additional mitigation measures are required.

3.10.4 Consistency with LORS

The modified project conforms to applicable LORS related to socioeconomics.

3.10.5 Conditions of Certification

The proposed modification does not require changes to the COCs for socioeconomics.

3.11 Soil and Water Resources

3.11.1 Environmental Setting

This PTA does not require changes to the soil and water resources setting described in the Final Decision and subsequent amendments.

3.11.2 Environmental Consequences

The proposed modification will result in minimal ground disturbance and two deep excavation efforts. The deepest excavation associated with the proposed modification will be 16 feet below grade for the sump pump well foundation, measuring 13-feet by 13-feet. A 10-foot bellhole, measuring 10-feet by 10-feet, will also be excavated to establish the connection between the new wastewater pipelines and the existing AES sanitary sewer line leading to the OCSD trunkline. All other excavations range from 2.5 to 8 feet below grade for underground pipelines and pipeline support foundations. These excavations will take place where there would have been ground disturbance during HBEP development and occur entirely within the developed project site. Therefore, no significant construction-related impacts to soil and water resources are expected.

From an operational perspective, the proposed modification reroutes process wastewater discharges to the OCSD sanitary sewer and maintains stormwater discharges to the Pacific Ocean without any increase in water consumption or discharge volumes. In addition, no new water metering devices will be installed as part of the project. Therefore, no operational soil and water resources impacts are expected beyond potential updates to the site's discharge permits.

3.11.3 Mitigation Measures

The proposed modification will not create a significant soil and water resources impact and will not require additional mitigation measures. Furthermore, based on the limited scope of work, SOIL&WATER-6 of the existing construction COCs should be applicable to this project, as identified in Attachment 2.2.

3.11.4 Consistency with LORS

The proposed modification will comply with applicable LORS, with implementation of existing construction COCs and by securing a Class I Wastewater Discharge Permit with OCSD. In addition, AES

recently sampled and analyzed its wastewater discharge to confirm it complied with the discharge limits required by OCSD's Wastewater Ordinance (OCSD-53).

3.11.5 Conditions of Certification

As previously described, the proposed modification will eliminate process wastewater discharges to the Pacific Ocean. As a result, AES will continue to discharge stormwater under an NPDES permit but will discharge process wastewater via a new connection to OCSD. SOIL&WATER-4 and SOIL&WATER-5 may require revisions to reflect these changes.

3.12 Traffic and Transportation

3.12.1 Environmental Setting

This PTA does not require changes to the traffic and transportation setting described in the Final Decision and subsequent amendments.

3.12.2 Environmental Consequences

The proposed modification will require up to 5 workers per week and daily truck/delivery trips to the site. This increase in worker/truck deliveries to the site does not result in a material increase in traffic in the project area. In addition, no ground disturbance will occur on public roads, easements, or rights-of-way. Therefore, no significant impacts to traffic or transportation are expected.

3.12.3 Mitigation Measures

The proposed modification will not create a significant traffic and transportation impact and will not require additional mitigation measures. Furthermore, based on the limited scope of work, TRANS-3 of the existing construction COCs should be applicable to this project, as identified in Attachment 2.2.

3.12.4 Consistency with LORS

The proposed modification will comply with applicable LORS, with implementation of existing construction COCs.

3.12.5 Conditions of Certification

The proposed modification does not require changes to the COCs for traffic and transportation.

3.13 Visual Resources

3.13.1 Environmental Setting

This PTA does not require changes to the visual resources setting described in the Final Decision and subsequent amendments.

3.13.2 Environmental Consequences

Temporary lighting will not be required to facilitate construction activities. Therefore, no visual resources impacts are expected during construction.

The proposed modification will not materially alter the physical appearance of the project. Therefore, no operational visual resources impacts are expected.

3.13.3 Mitigation Measures

No visual resources impacts are expected from the proposed modification. Therefore, no additional mitigation measures are required.

3.13.4 Consistency with LORS

The modified project conforms to applicable LORS related to visual resources.

3.13.5 Conditions of Certification

The proposed modification does not require changes to the COCs for visual resources.

3.14 Waste Management

3.14.1 Environmental Setting

This PTA does not require changes to the waste management setting described in the Final Decision and subsequent amendments.

3.14.2 Environmental Consequences

The proposed change will generate some construction wastes, primarily ground asphaltic cement. Construction wastes will be recycled to the extent feasible, and any non-recyclable wastes will be disposed of consistent with the facility's operational waste management plan. Therefore, less-than-significant impacts to waste management are expected.

3.14.3 Mitigation Measures

The proposed modification will not create a significant waste management impact and will not require additional mitigation measures. Furthermore, based on the limited scope of work, WASTE-7 of the existing construction COCs should be applicable to this project, as identified in Attachment 2.2.

3.14.4 Consistency with LORS

The proposed modification will comply with applicable LORS, with implementation of existing construction COCs.

3.14.5 Conditions of Certification

The proposed modification does not require changes to the COCs for waste management.

3.15 Wildfire

3.15.1 Environmental Setting

The HBEP site is not located in or near a State Responsibility Area or a very high Fire Hazard Severity Zone.

3.15.2 Environmental Consequences

The proposed modification will not substantially impair an adopted emergency response/evacuation plan, expose project occupants to wildfire-related air pollution, require installation or maintenance of

associated infrastructure that could exacerbate fire risk, or expose people or structures to significant risks due to flooding or landslides.

3.15.3 Mitigation Measures

No wildfire impacts are expected from the proposed modification. Therefore, no additional mitigation measures are required.

3.15.4 Consistency with LORS

The modified project conforms to applicable LORS related to wildfire.

3.15.5 Conditions of Certification

The Final Decision and subsequent amendments did not include COCs for wildfire and, as no impacts are expected, none are required.

3.16 Worker Safety and Fire Protection

3.16.1 Environmental Setting

This PTA does not require changes to the worker safety and fire protection setting described in the Final Decision and subsequent amendments.

3.16.2 Environmental Consequences

The proposed modification is not expected to increase workers' exposure to health and safety hazards nor negatively impact the availability and adequacy of fire protection and emergency response services. Therefore, no impacts to worker safety and fire protection are expected.

3.16.3 Mitigation Measures

No worker safety and fire protection impacts are expected from the proposed modification. Therefore, no additional mitigation measures are required. In addition, potential construction-related fires will be mitigated through the site's existing operational fire safety systems.

3.16.4 Consistency with LORS

The modified project conforms to applicable LORS related to worker safety and fire protection.

3.16.5 Conditions of Certification

The proposed modification does not require changes to the COCs for worker safety and fire protection.

4. Potential Effects on the Public

This section discusses the potential effects on the public that may result from the modification proposed in this PTA, in accordance with CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(F)).

With implementation of the proposed modification, the project would have no adverse effect on the public once construction is completed. As described previously, construction activities will occur entirely onsite with potential impacts minimized through implementation of existing construction COCs identified in Attachment 2.2. Therefore, no significant adverse effects on the public will occur because of the project modification proposed in this PTA.

5. List of Property Owners

In accordance with the CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(G)), a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of any affected project linears and 1,000 feet of the project site will be provided under separate cover. Since the proposed modification does not affect any offsite project linears, only the list of parcel/property owners within 1,000 feet of the project site itself will be provided.

6. Potential Effects on Property Owners, the Public, and Parties in the Proceeding

This section addresses potential effects of the project modification proposed in this PTA on nearby property owners, the public, and parties in the application proceeding, in accordance with CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(H)).

As set forth in Section 3, the proposed modification is not expected to result in any significant impacts, and the project is expected to remain in compliance with all applicable LORS. The project, as modified, will not differ significantly in potential effects on adjacent landowners, compared with the project as certified. The project, therefore, would have no adverse effects on nearby property owners, the public, or other parties in the application proceeding.

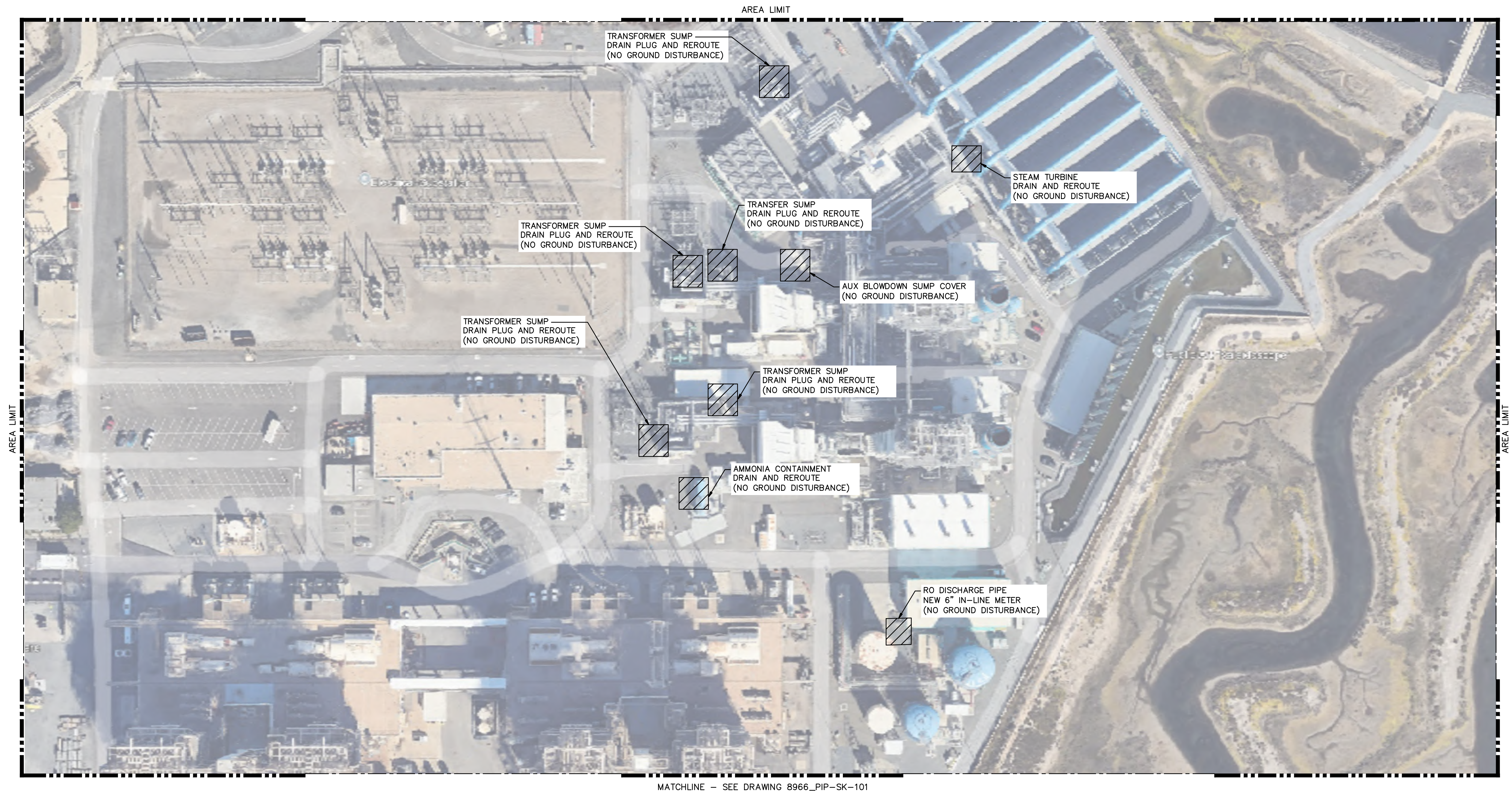
7. Potentially Applicable CEQA Exemptions

This section includes a discussion of any exemptions from CEQA, commencing with Section 21000 of the Public Resources Code, that the Project Owner believes may apply to approval of the proposed change. Given the rerouting of wastewater discharges and installation of new pipelines and supporting infrastructure, no CEQA exemptions appear to apply for this PTA.

Attachment 2.1

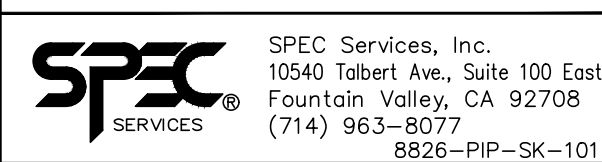
Civil Engineering Design Drawings





PLOT PLAN
SCALE: 1/64"=1'-0"

**ISSUED FOR
PLAN CHECK**
APRIL 24, 2026

[illegible]

Attachment 2.2

Applicable COCs



Sewer Interconnection Upgrades Compliance Matrix
Huntington Beach Energy Project (12-AFC-02C)
List of Applicable Conditions of Certification

Technical Area	COC No.	Title	Condition of Certification Description	Compliance Verification	Comments
Air Quality	AQ-SC1	Air Quality Construction Mitigation Manager (AQCOMM)	The project owner shall designate and have during construction/demolition activities an AQCOMM who shall be responsible for directing and documenting compliance with Conditions AQ-SC3, AQ-SC4, and AQ-SC5 for the entire duration of project site construction/demolition. The project owner may elect to assign one or more AQCOMMs as well. The on-site AQCOMM may delegate responsibilities to one or more AQCOMM delegates. The AQCOMM and AQCOMM delegates shall have full access to all areas of construction/demolition on the project site, and shall have the authority to stop any or all construction/demolition activities as warranted by applicable construction/demolition mitigation conditions. The AQCOMM and AQCOMM delegates may have other responsibilities in addition to those described in this condition.	At least 60 days prior to the start of ground disturbance, the project owner shall submit to the CPM for approval the name, resume, qualifications, and contact information for the first on-site AQCOMM and all AQCOMM delegates. The AQCOMM and all delegates must be approved by the CPM before the start of ground disturbance. An AQCOMM may be replaced after ground disturbance if the replacement AQCOMM has been approved by the CPM.	H. Zhuang and J. Salamy are the site's currently approved AQCOMMs. Resumes for new AQCOMM Delegates will be submitted for CPM approval 60 days prior to the start of ground disturbance.
Air Quality	AQ-SC3	Construction Fugitive Dust Control	Project owner shall implement the following control measures to mitigate for any increases in regional criteria pollutants during construction, including fugitive dust. The AQCOMM shall submit documentation to the CPM in each monthly compliance report (MCR) that demonstrates compliance with the Air Quality Construction Mitigation Plan (AQCMP) mitigation measures for purposes of minimizing fugitive dust emission creation from construction activities and preventing all fugitive dust plumes from leaving the project's boundary. The following fugitive dust mitigation measures shall be included in the AQCMP required by AQ-SC2, and any deviation from the AQCMP mitigation measures shall require prior CPM notification and approval. A. The main access roads through the facility to the power block areas will be either paved or stabilized using soil binders, or equivalent methods, to provide a stabilized surface that is similar for the purposes of dust control to paving, that may or may not include a crushed rock (gravel or similar material with fines removed) top layer, prior to initiating construction in the main power block area, and delivery areas for operations materials (chemical, replacement parts, etc.) will be paved prior to taking initial deliveries. B. All unpaved construction roads and unpaved operation site roads, as they are being constructed, shall be stabilized with a non-toxic soil stabilizer or soil weighting agent that can be determined to be both as efficient or more efficient for fugitive dust control as ARB approved soil stabilizers, and shall not increase any other environmental impacts including loss of vegetation to areas beyond where the soil stabilizers are being applied for dust control. All other disturbed areas in the project construction site shall be watered as frequently as necessary during grading; and after active construction activities shall be stabilized with a non-toxic soil stabilizer or soil weighting agent, or alternative approved soil stabilizing methods, in order to comply with the dust mitigation objectives of Condition of Certification AQ-SC4. The frequency of watering can be reduced or eliminated during periods of precipitation. C. No vehicle shall exceed 10 miles per hour on unpaved areas within the construction site, with the exception that vehicles may travel up to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions. D. The construction site entrances shall be posted with visible speed limit signs. E. Wheel washers shall be installed for all exiting trucks and equipment, or wheels shall be inspected and washed (as necessary) to remove accumulated dirt prior to leaving the site. F. Gravel ramps of at least 20 feet in length must be provided at the tire washing/cleaning station. G. All unpaved exits from the construction site shall be graveled or treated to prevent track-out to public roadways. H. All construction vehicles shall enter the construction site through the treated entrance roadways unless an alternative route has been submitted to and approved by the CPM. I. Sandbags or other erosion control measures shall be installed consistent with the requirements of the Storm Water Pollution Prevention Plan (SWPPP). J. All paved roads within the construction site shall be swept daily or as needed (less during periods of precipitation) on days when construction activity occurs to prevent the accumulation of dirt and debris. K. At least the first 500 feet of any paved public roadway exiting the construction site or exiting other unpaved roads en route from the construction site or construction staging areas shall be swept as needed (less during periods of precipitation) on days when construction activity occurs or on any other day when dirt or run-off resulting from the construction site activities is visible on the public paved roadways. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden. L. All soil storage piles and disturbed areas that remain inactive for longer than 10 days shall be covered or treated with appropriate dust suppressant compounds. M. When bulk materials are transported offsite, all materials that have the potential to cause visible emissions shall be provided with a cover, or the materials shall be sufficiently wetted and loaded onto the trucks in a manner to provide at least two feet of freeboard. N. Wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) shall be used on all construction areas that may be disturbed. Any windbreaks installed to comply with this condition shall remain in place until the soil is stabilized or permanently covered with vegetation.	The AQCOMM shall provide the CPM a Monthly Compliance Report to include the following to demonstrate control of fugitive dust emissions: A. A summary of all actions taken to maintain compliance with this condition; and B. Copies of any air quality-related complaints filed with the air district or facility representatives in relation to project construction; and C. Any other documentation deemed necessary by the CPM or AQCOMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.	Instead of filing Monthly Compliance Reports (MCRs), one report covering the entire construction duration will be submitted 30 days after project completion.
Air Quality	AQ-SC4	Dust Plume Response Requirement	The AQCOMM or an AQCOMM delegate shall monitor all construction activities for visible dust plumes. Observations of visible dust plumes that have the potential to be transported off the project site and within 400 feet upwind of any regularly occupied structures not owned by the project owner indicates that existing mitigation measures are not resulting in effective mitigation. The AQCMP shall include a section detailing how the additional mitigation measures will be accomplished within the time limits specified. The AQCOMM or delegate shall implement the following procedures for additional mitigation measures in the event that such visible dust plumes are observed: Step 1: The AQCOMM or delegate shall direct more intensive application of the existing mitigation methods within 15 minutes of making such a determination. Step 2: The AQCOMM or Delegate shall direct implementation of additional methods of dust suppression if Step 1, specified above, fails to result in adequate mitigation within 30 minutes of the original determination. Step 3: The AQCOMM or delegate shall direct a temporary shutdown of the activity causing the emissions if Step 2, specified above, fails to result in effective mitigation within one hour of the original determination. The activity shall not restart until the AQCOMM or delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the shutdown activity. The owner/ operator may appeal to the CPM any directive from the AQCOMM or delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.	The AQCOMM shall provide the CPM a Monthly Compliance Report to include: A. A summary of all actions taken to maintain compliance with this condition; B. Copies of any air quality related complaints filed with the air district or facility representatives in relation to project construction; and C. Any other documentation deemed necessary by the CPM and AQCOMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.	Instead of filing MCRs, one report covering the entire construction duration will be submitted 30 days after project completion.
Air Quality	AQ-SC5	Diesel-Fueled Engine Control	The AQCOMM shall submit to the CPM, in the Monthly Compliance Report, a table that demonstrates compliance with the AQCMP mitigation measures for purposes of controlling diesel construction-related combustion emissions. Any deviation from the AQCMP mitigation measures requires prior CPM notification and approval. All off-road diesel construction equipment used in the construction of this facility shall be powered by the cleanest engines available that also comply with the California Air Resources Board's (ARB's) Regulation for In-Use Off-Road Diesel Fleets and shall be included in the Air Quality Construction Mitigation Plan (AQCMP) required by AQ-SC2. The AQCOMM measures shall include the following, with the lowest-emitting engine chosen in each case, as available: A. All off-road vehicles with compression ignition engines shall comply with the ARB's Regulation for In-Use Off-Road Diesel Fleets (California Code of Regulation Title 13, Article 4.8, Chapter 9, §2449 et. seq.). B. To meet the highest level of emissions reduction available for the engine family of the equipment, each piece of diesel-powered equipment shall be powered by a Tier 4 engine (without add-on controls) or Tier 4i engine (without add-on controls), or a Tier 3 engine with a post-combustion retrofit device verified by the ARB or the US EPA. For PM, the retrofit device shall be a particulate filter if verified, or a flow-through filter, or at least an oxidation catalyst. For NOx, the device shall meet the latest Mark Level verified to be available. C. For diesel powered equipment where the requirements of Part "b" cannot be met, the equipment shall be equipped with a Tier 3 engine without retrofit control devices or with a Tier 2 or lower Tier engine using retrofit controls verified by ARB or US EPA as the best available control device to reduce exhaust emissions of PM and nitrogen oxides (NOx) unless certified by engine manufacturers or the onsite AQCOMM that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices can be considered "not practical" for the following, as well as other, reasons: 1. There is no available retrofit control device that has been verified by either the California Air Resources Board or U.S. Environmental Protection Agency to control the engine in question and the highest level of available control using retrofit or Tier 1 engines is being used for the engine in question; or 2. The use of the retrofit device would unduly restrict the vision of the operator such that the vehicle would be unsafe to operate because the device would impair the operator's vision to the front, sides, or rear of the vehicle, or 3. The construction equipment is intended to be on site for 10 work days or less. D. The CPM may grant relief from a requirement in Part "b" or "c" if the AQCOMM can demonstrate a good faith effort to comply with the requirement and that compliance is not practical. E. The use of a retrofit control device may be terminated immediately provided that the CPM is informed within 10 working days of the termination and a replacement for the equipment item in question meeting the level of control required occurs within 10 work days of termination of the use (if the equipment would be needed to continue working at this site for more than 15 work days after the use of the retrofit control device is terminated) if one of the following conditions exists: 1. The use of the retrofit control device is excessively reducing the normal availability of the construction equipment due to increased down time for maintenance, and/or reduced power output due to an excessive increase in exhaust back pressure. 2. The retrofit control device is causing or is reasonably expected to cause engine damage. 3. The retrofit control device is causing or is reasonably expected to cause a substantial risk to workers or the public. 4. Any other seriously detrimental cause which has the approval of the CPM prior to implementation of the termination. F. All equipment with engines meeting the requirements above shall be properly maintained and the engines tuned to the engine manufacturer's specifications. Each engine shall be in its original configuration and the equipment or engine must be replaced if it exceeds the manufacturer's approved oil consumption rate. G. Construction equipment will employ electric motors when feasible. H. If the requirements detailed above cannot be met, the AQCOMM shall certify that a good faith effort was made to meet these requirements and this determination must be approved by the CPM. I. All off-road diesel-fueled engines used in the construction of the facility shall have clearly visible tags issued by the on-site AQCOMM showing that the engine meets the conditions set forth herein.	The AQCOMM shall include in the MCR the following to demonstrate control of diesel construction-related emissions: A. A summary of all actions taken to control diesel construction related emissions; B. A list of all heavy equipment used on site during that month, showing the tier level of each engine and the basis for alternative compliance with this condition for each engine not meeting Part "b" or Part "c" requirements. The list shall include the owner of the equipment and a letter from each owner indicating that the equipment has been properly maintained; and C. Any other documentation deemed necessary by the CPM and AQCOMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.	Instead of filing MCRs, one report covering the entire construction duration will be submitted 30 days after project completion.
Biological Resources	BIO-2	Duties of Designated Biologist/Biological Monitor(s)	The project owner shall ensure that the Designated Biologist performs the following during any site (or related facilities) mobilization, ground disturbance, grading, demolition, and construction activities. The Designated Biologist may be assisted by the approved Biological Monitor(s) but remains the contact for the project owner and CPM. The Designated Biologist Duties shall include the following: 1. Advise the project owner's Construction and Operation Managers on the implementation of the biological resources conditions of certification; 2. Consult on the preparation of the Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP) (Condition of Certification BIO-6) to be submitted by the project owner; 3. Be available to supervise, conduct and coordinate mitigation, monitoring, and other biological resources compliance efforts, particularly in areas requiring avoidance or containing sensitive biological resources, such as special status species or their habitat; 4. Clearly mark sensitive biological resource areas and inspect these areas at appropriate intervals for compliance with regulatory terms and conditions; 5. Inspect or direct the site personnel how to inspect active construction areas where animals may have become trapped prior to construction commencing each day. Inspect or direct the site personnel how to inspect the installation of structures that prevent entrapment or allow escape during periods of construction inactivity. Periodically inspect areas with high vehicle activity (e.g., parking lots) for animals in harm's way. Inspect soil or spoil stockpiles and dust abatement watering for compliance with Condition of Certification BIO-7. Inspect erosion control materials (e.g., hay bales) to confirm weed-free certification. Inspect weed infestations and monitor eradication measures to determine success. Inspect trash receptacles, monitor site personnel compliance with trash handling, pet prohibitions, and all other Worker Environmental Awareness Program (WEAP) components (Condition of Certification BIO-5); 6. Notify the project owner and the CPM of any non-compliance with any biological resources condition of certification; 7. Respond directly to inquiries of the CPM regarding biological resource issues; 8. Maintain written records of the tasks specified above and those included in the BRMIMP; 9. Train the Biological Monitors as appropriate, and ensure their familiarity with the BRMIMP, WEAP training, and all permits; and 10. Maintain the ability to be in regular, direct communication with representatives of CDFW, USFWS, and CPM, including notifying these agencies of dead or injured listed species and reporting special status species observations to the California Natural Diversity Database.	The Designated Biologist will notify the CPM of any non-compliance or special-status species injury or mortality within one (1) working day of the incident. The Designated Biologist shall submit in the monthly compliance report (MCR) to the CPM copies of all written reports and summaries that document construction activities that have the potential to affect biological resources. The Designated Biologist's written records will be made available for the CPM's inspection on request at any time during normal business hours. During project operation, the Designated Biologist(s) shall submit record summaries in the annual compliance report unless their duties cease, as approved by the CPM.	Instead of filing MCRs, one report covering the entire construction duration will be submitted 30 days after project completion. Notification will be provided within 1-day of an incident, as applicable.
Biological Resources	BIO-4	Powers of Designated Biologist/Biological Monitor(s)	The project owner's construction/operation manager shall act on the advice of the Designated Biologist and Biological Monitor(s) to ensure conformance with the biological resources conditions of certification. If required by the Designated Biologist or Biological Monitor(s), the project owner's construction/operation manager shall halt all site mobilization, ground disturbance, grading, construction, and operation activities in areas specified by the Designated Biologist. The Designated Biologist shall: 1. Require a halt to all activities in any area when determined that there would be an unauthorized adverse impact to biological resources if the activities continued; 2. Inform the project owner and the construction/operation manager when to resume activities; 3. Notify the CPM if there is a halt of any activities and advise the CPM of any corrective actions that have been taken or would be instituted as a result of the work stoppage; and 4. The CPM, in coordination with CDFW or USFWS as appropriate, will determine if corrective action has been effective and will direct the project owner to take further corrective action as needed. If the Designated Biologist is unavailable for direct consultation, the Biological Monitor shall act on behalf of the Designated Biologist.	The project owner shall ensure that the Designated Biologist or Biological Monitor notifies the CPM immediately (and no later than the morning following the incident, or Monday morning in the case of a weekend) of any non-compliance or a halt of any site mobilization, ground disturbance, grading, construction, and operation activities. The project owner shall notify the CPM of the circumstances and actions being taken to resolve the problem within one (1) working day of initiating the corrective action. Whenever corrective action is taken by the project owner, a determination of success or failure would be made by the CPM within five working days after receipt of notice that corrective action is completed, or the project owner would be notified by the CPM that coordination with other agencies would require additional time before a determination can be made.	Immediate notification will be provided of an incident, as applicable. Notification will be provided within 1-day of corrective action, as applicable.

Sewer Interconnection Upgrades Compliance Matrix
Huntington Beach Energy Project (12-AFC-02C)
List of Applicable Conditions of Certification

Technical Area	COC No.	Title	Condition of Certification Description	Compliance Verification	Comments
Biological Resources	BIO-5	Biological Resources Worker Environmental Awareness Program (WEAP)	The project owner shall develop and implement an HBEP-specific Worker Environmental Awareness Program (WEAP) and submit the WEAP to the CPM for review and approval and to the USFWS and CDFW for review and comment. The WEAP shall be administered to all on-site personnel including surveyors, construction engineers, employees, contractors, contractor's employees, supervisors, inspectors, and subcontractors. The WEAP shall be implemented during site mobilization, ground disturbance, grading, construction, operation, and closure. The WEAP shall: 1. Be developed by or in consultation with the Designated Biologist and consist of an on-site or training center presentation in which supporting electronic media and written material is made available to all participants; 2. Discuss the locations and types of sensitive biological resources on the project site and adjacent areas, explain the reasons for protecting these resources, and the function of flagging in designating sensitive resources and authorized work areas; 3. Discuss federal and state laws afforded to protect the sensitive species and explain penalties for violation of applicable laws, ordinances, regulations, and standards (e.g., federal, and state endangered species acts); 4. Place special emphasis on the light-footed Ridgway's rail, western snowy plover, California least tern and Belding's savannah sparrow, including information on physical characteristics, distribution, behavior, ecology, sensitivity to human activities, legal protection and status, penalties for violations, reporting requirements, and protection measures; 5. Include a discussion of fire prevention measures to be implemented by workers during project activities; request workers to dispose of cigarettes and cigars appropriately and not leave them on the ground or buried; 6. Include a discussion of the biological resources conditions of certification; 7. Identify whom to contact if there are further comments and questions about the material discussed in the program; and 8. Include a training acknowledgment form to be signed by each worker indicating that they received the WEAP training and shall abide by the guidelines. The specific WEAP shall be administered by a competent individual(s) acceptable to the Designated Biologist.	At least 45 days prior to the start of any planned project-related site disturbance activities, the project owner shall provide to the CPM a copy of the draft WEAP and all supporting written materials and electronic media prepared or reviewed by the Designated Biologist and a resume of the person(s) administering the program. The Notice to Proceed will not be issued until the WEAP has been approved by the CPM. The project owner shall provide in the monthly compliance reports the number of persons who have completed the training in the prior month and a running total of all persons who have completed the training to date. Throughout the life of the project, WEAP training shall be repeated annually for permanent employees, and shall be routinely administered within one week of arrival to any new personnel, foremen, contractors, subcontractors, and other personnel potentially working within the project area. Upon completion of the orientation, employees shall sign a form stating that they attend the program and understand all protection measures. These forms shall be maintained by the project owner and shall be made available to the CPM upon request. Workers shall receive and be required to visibly display a hardhat sticker or certificate indicating that they have completed the required training. Training acknowledgement forms signed during construction shall be kept on file by the project owner for at least six months after the completion of all project construction activities. During project operation, signed statements for operational personnel shall be kept on file for six months following the termination of an individual's employment. In the absence of comments, the CPM shall deem the WEAP acceptable to USFWS and/or CDFW.	WEAP training for the site was previously approved by the CEC and will be implemented as required. Instead of filing MCRs, one report covering the entire construction duration will be submitted 30 days after project completion.
Biological Resources	BIO-7	General Impact Avoidance and Minimization Measures	The project owner shall implement the following measures during site mobilization, construction, operation, and closure to manage their project site and related facilities in a manner to avoid or minimize impacts to biological resources: 1. The boundaries of all areas to be temporarily or permanently disturbed (including staging areas, access roads, and sites for temporary placement of spoils) shall be delineated with stakes and flagging prior to construction activities in consultation with the Designated Biologist. Spoils shall be stockpiled in disturbed areas which do not provide habitat for special-status species. Parking areas, staging and disposal site locations shall similarly be located in areas without native vegetation or special-status species habitat. All disturbances, vehicles, and equipment shall be confined to the flagged areas. 2. At the end of each work day, the Designated Biologist, Biological Monitor, and/or site personnel shall ensure that all potential wildlife pitfalls (trenches, bores, and other excavations) have been backfilled. If site personnel are inspecting trenches, bores, and other excavations and wildlife is trapped, they will immediately notify the Designated Biologist and/or Biological Monitor. If backfilling is not feasible, all trenches, bores, and other excavations shall be sloped at a 3:1 ratio at the ends to provide wildlife escape ramps, or covered completely to prevent wildlife access. Should wildlife become trapped, the Designated Biologist or Biological Monitor shall remove and relocate the individual to a safe location. Any wildlife encountered during the course of construction shall be allowed to leave the construction area unharmed. 3. Transmission lines and all electrical components shall be designed, installed, and maintained in accordance with the Avian Power Line Interaction Committee's (APLIC's) Suggested Practices for Avian Protection on Power Lines (APLIC 2006) and Reducing Avian Collisions with Power Lines (APLIC 2012) to reduce the likelihood of large bird electrocutions and collisions. 4. Spoils shall not be stockpiled adjacent to the southeastern fence line to minimize potential for spoils to enter into adjacent wetlands. 5. Soil bonding and weighting agents used on unpaved surfaces shall be non-toxic to wildlife and plants. 6. To the extent feasible, FAA visibility lighting shall employ only strobed, strobe-like, or blinking incandescent lights, preferably with all lights illuminating simultaneously. Minimum intensity, maximum "off-phased" dual strobes are preferred, and no steady burning lights (e.g., L-810s) shall be used. 7. Water applied to dirt roads and construction areas (trenches or spoil piles) for dust abatement shall use the minimal amount needed to meet safety and air quality standards in an effort to prevent the formation of puddles, which could attract California least tern predators to construction sites. During construction, site personnel shall patrol these areas to ensure water does not puddle and attract crows and other wildlife to the site, and shall take appropriate action to reduce water application rates where necessary. During construction, each employee shall report on-site deaths, including road kill, and injuries of special-status species to the Designated Biologist or Biological Monitor immediately upon discovery. The Designated Biologist or Biological Monitor shall remove the carcass or injured animal promptly. The Designated Biologist or Biological Monitor shall immediately report any dead or injured special-status species to CDFW and/or USFWS and the CPM, and the project owner shall follow instructions that are provided by CDFW or USFWS. The Designated Biologist shall maintain a record of all dead or injured special-status species, including species name, physical characteristics of the animal (sex, age class, length, and weight), disposition of the animal, and other pertinent information and shall include this information in the MCR. 8. During operations, each employee shall report all deaths, including road kill, and injuries of special-status species to the Project Environmental Compliance Monitor immediately upon discovery shall be notified. The Project Environmental Compliance Monitor shall remove the carcass or injured animal promptly. The Project Environmental Compliance Monitor shall immediately report any dead or injured special-status species to CDFW and/or USFWS and the CPM, and the project owner shall follow instructions that are provided by CDFW or USFWS. The Project Environmental Compliance Monitor shall maintain a record of all dead or injured special-status species, including species name, physical characteristics of the animal (sex, age class, length, and weight), disposition of the animal, and other pertinent information. 9. All vehicles and equipment shall be maintained in proper working condition to minimize the potential for fugitive emissions of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. The Designated Biologist shall be informed of any hazardous spills immediately as directed in the project Hazardous Materials Plan (see Condition of Certification HAZ-2). Hazardous spills shall be immediately cleaned up and the contaminated soil will be properly disposed of at a licensed facility. Any on-site servicing of vehicles or construction equipment shall take place only at a designated area approved by the Designated Biologist. Service/maintenance vehicles shall carry a bucket and pads to absorb leaks or spills. 10. During construction all trash and food-related waste shall be placed in self-closing containers and removed weekly or more frequently from the site. Workers shall not feed wildlife or bring pets to the project site. 11. Except for law enforcement personnel, no workers or visitors to the site shall bring firearms or weapons. 12. The project owner shall implement the following measures during construction and operation to prevent the spread and propagation of non-native, invasive weeds: a. Limit the size of any vegetation and/or ground disturbance to the minimum area needed for safe completion of project activities, and limit ingress and egress to defined routes; b. Use only weed-free straw, hay bales, and seed for erosion control and sediment barrier installations. Invasive non-native species shall not be used in landscaping plans and erosion control. Monitor and rapidly implement control measures to ensure early detection and eradication of weed invasions. 13. During construction and operation, the project owner shall conduct pesticide management in accordance with standard BMPs. The BMPs shall include non-point source pollution control measures. The project owner shall use a licensed herbicide applicator and obtain recommendations for herbicide use from a licensed Pest Control Advisor. Herbicide applications must follow EPA label instructions. Minimize use of rodenticides and herbicides in the project area and prohibit the use of chemicals and pesticides known to cause harm to non-target plants and wildlife. The project owner shall only use pesticides for which a "no effect" determination has been issued by the EPA's Endangered Species Protection Program for any species likely to occur within the project area or adjacent wetlands. If rodent control must be conducted, zinc phosphide or an equivalent product shall be used.	All mitigation measures and their implementation methods shall be included in the BRMIMP and implemented. Implementation of the measures shall be reported in the monthly compliance reports by the designated biologist. Within 30 days after completion of project construction, the project owner shall provide to the CPM, for review and approval, a written construction completion report identifying how measures have been completed (see Condition of Certification BIO-6 verification). Monthly and annual compliance reports will include results of all regular inspections by the Designated Biologist and Biological Monitor(s), including but not limited to the requirements cited above and in Condition of Certification BIO-2. The project owner must maintain written records of vehicle and equipment inspection and maintenance, and provide summaries in each monthly and annual compliance report. The complete written vehicle maintenance record will be available for the CPM's inspection during normal business hours. The BRMIMP (Condition of Certification BIO-6) must include affirmation by the project owner that: • All electrical component design conforms to applicable APLIC guidelines; and • All soil binders conform to the requirements stated above.	Instead of filing MCRs, one report covering the entire construction duration will be submitted 30 days after project completion.
Biological Resources	BIO-8	Pre-Construction Nest Surveys and Impact Avoidance and Minimization Measures for Breeding Birds	Pre-construction nest surveys shall be conducted if construction or demolition activities will occur from February 1 through August 31. The Designated Biologist or Biological Monitor shall perform surveys in accordance with the following guidelines: 1. Surveys shall cover all potential nesting habitat and substrate within the project site and areas surrounding the project site within 300 feet of the project boundary. 2. At least two pre-construction surveys shall be conducted, separated by a minimum 10-day interval. Pre-construction surveys shall be conducted no more than 14 days prior to initiation of construction activity. One survey needs to be conducted within the 3-day period preceding initiation of construction activity. Additional follow-up surveys may be required if periods of construction inactivity exceed three weeks during February 1 through August 31 in any given area, an interval during which birds may establish a nesting territory and initiate egg laying and incubation. 3. If active nests are detected during the survey, a no-disturbance buffer zone (protected area surrounding the nest) shall be established around each nest. Specific buffer distances are provided below for applicable avian groups (Biological Resources Table 1); these buffers may be modified with CPM's approval. For special-status species, if an active nest is identified, the size of each buffer zone shall be determined by the Designated Biologist in consultation with the CPM (in coordination with CDFW and USFWS). Nest locations shall be mapped using GPS technology. 4. If active nests are detected during the survey, the Designated Biologist or Biological Monitor shall monitor all nests with buffers at least once per week, to determine whether birds are being disturbed. If signs of disturbance or distress are observed, the Designated Biologist or Biological Monitor shall immediately implement adaptive measures to reduce disturbance in coordination with the CPM. These measures could include, but are not limited to, increasing buffer size, halting disruptive construction activities in the vicinity of the nest until fledging is confirmed, or placement of visual screens or sound dampening structures between the nest and construction activity. 5. If active nests are detected during the survey, the Designated Biologist or Biological Monitor shall monitor the nest until he or she determines that nestlings have fledged and dispersed or the nest is no longer active. Activities that might, in the opinion of the Designated Biologist or Biological Monitor, disturb nesting activities (e.g., exposure to exhaust), shall be prohibited within the buffer zone until such a determination is made. 6. A qualified biologist shall conduct a habitat assessment for light-footed Ridgway's rail in Magnolia and Upper Magnolia Marshes during the breeding season (March 1 to August 1) immediately preceding the commencement of construction and demolition activities. If suitable breeding habitat for the light-footed Ridgway's rail is identified, focused surveys will be conducted prior to any construction or demolition activities. Surveys are not required if no suitable habitat is present. If light-footed Ridgway's rails are detected during the breeding season, the CPM, CDFW, and USFWS will be notified and the project owner will consult with the USFWS for incidental take authorization, if required.	The project owner shall provide notification to the CPM, CDFW, and USFWS at least 2 weeks prior to initiating the habitat assessment and any subsequent surveys for light-footed Ridgway's rail; notification will include the name and resume of the biologist(s) conducting the habitat assessment and surveys and the timing of the surveys. Within ten (10) days of completion of the field work, the project owner shall provide the CPM, CDFW, and USFWS a report describing the findings of the preconstruction nest surveys and the light-footed Ridgway's rail habitat assessment and focused survey (if surveys were conducted), including a description and representative photographs of habitat in the marshes; the time, date, methods, and duration of the surveys; identity and qualifications of the surveyor(s); and a list of species observed. If active nests are detected during the surveys, the reports shall include a map or aerial photo identifying the location of the nest(s) and shall depict the boundaries of the proposed no disturbance buffer zone around the nest(s). The CPM will consider any timely comments received from CDFW and USFWS in review of the report. In the absence of comments within that timeframe, the CPM shall deem the report acceptable to USFWS and/or CDFW. Additionally, the nest monitoring plan shall be submitted to the CPM for review and approval and to USFWS and CDFW for review and comment prior to any planned demolition or construction activities in the vicinity of any active nest. No such demolition or construction activities may proceed without CPM approval of the nest monitoring plan. If light-footed Ridgway's rails are documented during the breeding season in Upper Magnolia or Magnolia Marshes, prior to any planned pile driving on the site or demolition or construction activities within 400 feet of the marsh boundary, the project owner will notify the CPM and will consult with the USFWS for incidental take authorization or a determination that no incidental take authorization is required. All impact avoidance and minimization measures related to nesting birds shall be included in the BRMIMP and implemented. In the absence of comments within that timeframe, the CPM shall deem the nest monitoring plan acceptable to USFWS and/or CDFW. Implementation of the measures shall be reported in the monthly compliance reports by the Designated Biologist. The project owner shall provide the CPM with the resume and qualifications of its CRS for review and approval at least 75 days prior to the start of (1) ground disturbance (as defined in the Compliance Conditions section); (2) post-certification cultural resources activities (including, but not limited to, "survey", "in-field data recording," "surface collection," "testing," "data recovery" or "geochaeology"); or (3) site preparation or subsurface soil work during pre-construction activities or site mobilization, the project owner shall obtain the services of a Cultural Resources Specialist (CRS) and one or more alternate CRS. The project owner may replace a CRS by submitting the required resume, references, and contact information to the CPM at least ten working days prior to the termination or release of the then-current CRS. In an emergency, the project owner shall immediately notify the CPM to discuss the qualifications and approval of a short-term replacement while a permanent CRS is proposed to the CPM for consideration. The CPM may withhold approval of a CRS based upon proof that a proposed CRS has repeatedly failed to comply with the conditions of any Energy Commission license as they pertain to cultural resources. If the project owner proposes to use a CRS previously approved by the Energy Commission within the preceding five (5) years, the CPM shall have ten (10) business days to review the resume and statement of availability of the proposed CRS. The CPM may withhold approval of a previously-approved CRS only (1) if the non-compliance with conditions of an Energy Commission license was documented in the compliance record for the previous Energy Commission license project work or (2) if the proposed previously-approved CRS's qualifications are not commensurate with all criteria in Paragraph A of this Condition of Certification. The CPM shall provide notice of disapproval of the proposed CRS within ten (10) business days of receipt of the resume and statement of availability of any proposed CRS. In the case of a previously-approved CRS, failure to provide notice within ten (10) business days of receipt of the resume and statement of availability of the proposed CRS shall be deemed approval of that candidate. The CPM shall meet and confer with the project owner regarding the disapproval of a previously-approved CRS or the need to remove or replace a CRS. Removal or replacement may occur if the CPM can establish that the CRS has repeatedly failed to comply with the conditions of the Amended HBEP license that pertain to cultural resources. At least 20 days prior to Cultural Resources Ground Disturbances, the CRS shall provide proof of qualifications for any anticipated CRMs and additional specialists for the project to the CPM. At least 5 days prior to additional CRMs or NAMs beginning on-site duties during the project, the CRS shall review the qualifications of the proposed CRMs or NAMs and send approval letters to the CPM, identifying the monitors and attesting to their qualifications. At least 10 days prior to any technical specialists beginning tasks, the resume(s) of the specialists shall be provided to the CPM for review and approval. At least 10 days prior to the start of construction-related ground disturbance, the project owner shall confirm in writing to the CPM that the approved CRS will be available for on-site work and is prepared to implement the cultural resources conditions. No Cultural Resources Ground Disturbances shall occur prior to CPM approval of the CRS and alternates, unless such activities are specifically approved by the CPM.	The site's Nest Monitoring Plan was previously approved by the CEC and will be implemented as required. Notification will be provided 2 weeks prior to conducting the required surveys. 2 surveys will be conducted within 14 days of the start of construction (at least 10 days apart), with the latter no more than 3 days prior to the start of construction; this includes at least one habitat assessment. A report will be submitted within 10 days of completing the 2nd survey. Monitoring will be conducted weekly during
Cultural Resources	CUL-1	Appointment and Qualifications of Cultural Resources Specialist (CRS)	A. CULTURAL RESOURCE SPECIALIST 1. Appointment and Qualifications The project owner shall assign at least one Cultural Resources Specialist (CRS) to the project. The project owner shall submit the resume of the proposed CRS, with at least three references and contact information, to the Energy Commission CPM for review and approval. The CRS and alternate CRS(s) shall have training and background that conform to the U.S. Secretary of the Interior's Professional Qualifications Standards, as published in Title 36, Code of Federal Regulations, part 61. In addition, the CRS and alternate CRS(s) shall have the following qualifications: a. A background in anthropology, archaeology, history, architectural history, or a related field; b. At least 10 years of archaeological or historical experience (as appropriate for the project site), with resources mitigation and fieldwork; c. At least one year of field experience in California; and d. At least three years of experience in a decision-making capacity on cultural resources projects in California and the appropriate training and experience to knowledgeably make recommendations regarding the significance of cultural resources. The project owner may replace the CRS by submitting the required resume, references and contact information of the proposed replacement to the CPM. 2. Duties of Cultural Resources Specialist The CRS shall manage all cultural resource monitoring, mitigation, curation, and reporting activities, and any post-certification cultural resource activities (as defined above), unless management of these is otherwise provided for in accordance with the cultural resource conditions of certification (conditions). The CRS shall serve as the primary point of contact on all cultural resource matters for the Energy Commission. The CRS may elect to obtain the services of Cultural Resource Monitors (CRMs), Native American Monitors (NAMs), and other technical specialists, if needed, to assist in monitoring, mitigation, and curation activities. The project owner shall ensure that the CRS makes recommendations regarding the eligibility for listing in the California Register of Historical Resources (CRHR) of any cultural resources that are newly discovered or that may be affected in an unanticipated manner. After all ground disturbances is completed and the CRS has fulfilled all responsibilities specified in these cultural resources conditions, the project owner may discharge the CRS, after receiving approval from the CPM. The conditions of certification described in this subsection of the FSA shall continue to apply during operation of the proposed power plant. B. CULTURAL RESOURCES MONITORS 1. Appointment and Qualifications The project owner may assign Cultural Resources Monitors (CRMs). CRMs shall have the following qualifications: a. B.S. or B.A. degree in anthropology, archaeology, historical archaeology, or a related field; and one year of archaeological field experience in California; or b. A.S. or A.A. degree in anthropology, archaeology, historical archaeology, or a related field, and four years of archaeological field experience in California; or c. Enrollment in upper division classes pursuing a degree in the fields of anthropology, archaeology, historical archaeology, or a related field, and two years of archaeological field experience in California. C. NATIVE AMERICAN MONITORS 1. Appointment and Qualifications: If required pursuant to Condition of Certification CUL-6, the project owner shall obtain the services of qualified Native American Monitors (NAMs). Preference in selecting NAMs shall be given to Native Americans with: a. Traditional ties to the area to be monitored; and b. The highest qualifications as described by the Native American Heritage Commission (NAHC) document entitled: Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites (NAHC 2005).		T. Spillane is the site's currently approved CRS. If needed, a resume for a new CRS will be submitted 10 days prior to his replacement. Notification of the CRS's availability will be provided 10 days prior to ground disturbance.

Sewer Interconnection Upgrades Compliance Matrix
Huntington Beach Energy Project (12-AFC-02C)
List of Applicable Conditions of Certification

Technical Area	COC No.	Title	Condition of Certification Description	Compliance Verification	Comments
Cultural Resources	CUL-2	Information to be Provided to CRS	Prior to the start of Cultural Resources Ground Disturbances, the project owner shall provide the CRS with copies of the AFC, data responses, confidential cultural resources reports, all supplements, the Energy Commission staff's cultural resources FSA, and the cultural resources conditions of certification from the Final Decision for the project if the CRS has not previously worked on the project. The project owner shall also provide the CRS and the CPM with maps and drawings showing the footprints of the power plant, all linear facility routes, all access roads, and all laydown areas. Maps shall include the appropriate USGS quadrangles and a map at an appropriate scale (e.g., 1:24,000 and 1 inch = 200 feet, respectively) for plotting cultural features or materials. If the CRS requests enlargements or strip maps for linear facility routes, the project owner shall provide copies to the CRS and CPM. The CPM shall review map submittals and, in consultation with the CRS, approve those that are appropriate for use in cultural resources planning activities. No ground disturbance shall occur prior to CPM approval of maps and drawings, unless such activities are specifically approved by the CPM. Maps shall include any NRHP/CRHR-eligible historic built environment resources identified in the FSA's archaeological project area of analysis. If construction of the project would proceed in phases, maps and drawings not previously provided shall be provided to the CRS and CPM prior to the start of each phase. Written notice identifying the proposed schedule of each project phase shall be provided to the CRS and CPM. Weekly, until ground disturbance is completed, the project construction manager shall provide to the CRS and CPM a schedule of project activities for the following week, including the identification of area(s) where ground disturbance will occur during that week. The project owner shall notify the CRS and CPM of any changes to the scheduling of the construction phases. The project owner shall provide the documents described in the first paragraph of this condition to new CRSs in the event that the approved CRS is terminated or resigns.	1. At least 40 days prior to the start of ground disturbance, the project owner shall provide the CPM notice that the AFC, data responses, confidential cultural resources documents, all supplements, FSA, and Final Commission Decision have been provided to the CRS, if needed, and the subject maps and drawings to the CRS and CPM. The CPM will review submittals in consultation with the CRS and approve maps and drawings suitable for cultural resources planning activities. 2. At least 15 days prior to the start of ground disturbance, if there are changes to any project-related footprint, the project owner shall provide revised maps and drawings for the changes to the CRS and CPM. 3. At least 15 days prior to the start of each phase of a phased project, the project owner shall submit the appropriate maps and drawings, if not previously provided, to the CRS and CPM. 4. Weekly, during ground disturbance, a schedule of the next week's anticipated project activity shall be provided to the CRS and CPM by letter, e-mail, or fax. 5. Within 5 days of changing the scheduling of phases of a phased project, the project owner shall provide written notice of the changes to the CRS and CPM. 6. If a new CRS is approved by the CPM as provided for in CUL-1, the project owner shall provide the CPM notice that the AFC, data responses, confidential cultural resources documents, all supplements, FSA, Final Commission Decision, and maps and drawings have been provided to the new CRS within 10 days of such approval.	Information will be provided to the CRS 40 days prior to ground disturbance or within 10 days for a new CRS. Construction schedules will be provided weekly during ground disturbance.
Cultural Resources	CUL-3	Cultural Resources Mitigation and Monitoring Plan (CRMMP)	Prior to the start of Cultural Resources Ground Disturbances, the project owner shall submit the Cultural Resources Mitigation and Monitoring Plan (CRMMP), as prepared by or under the direction of the CRS, to the CPM for review and approval. The CRMMP shall follow the content and organization of the draft model CRMMP, provided by the CPM, and the authors' name(s) shall appear on the title page of the CRMMP. The CRMMP shall identify measures to minimize potential impacts to sensitive cultural resources. Implementation of the CRMMP shall be the responsibility of the CRS and the project owner. Copies of the CRMMP shall reside with the CRS, alternate CRS, each CRM, any NAMs involved in monitoring, and the project owner's on-site construction manager. No ground disturbance shall occur prior to CPM approval of the CRMMP, unless such activities are specifically approved by the CPM. The CRMMP shall be designated as a confidential document if the location(s) of cultural resources are described or mapped. The CRMMP shall include, but not be limited to, the following elements and measures: 1. The following statement included in the Introduction: "Any discussion, summary, or paraphrasing of the conditions of certification in this CRMMP is intended as general guidance and as an aid to the user in understanding the conditions and their implementation. The conditions, as written in the Commission Decision, shall supersede any summarization, description, or interpretation of the conditions in the CRMMP. The Cultural Resources conditions of certification from the Commission Decision are contained in Appendix A." 2. A proposed general research design that includes a discussion of archaeological research questions and testable hypotheses specifically applicable to the project area, and a discussion of artifact collection, retention/disposal, and curation policies as related to the research questions formulated in the research design. The research design shall specify that the preferred treatment strategy for any buried archaeological deposits is avoidance. A specific mitigation plan shall be prepared for any unavoidable impacts to any CRHR-eligible (as determined by the CPM) resources. A prescriptive treatment plan may be included in the CRMMP for limited data types. 3. Specification of the implementation sequence and the estimated time frames needed to accomplish all project-related tasks during the ground-disturbance and post-ground-disturbance analysis phases of the project. 4. Identification of the person(s) expected to perform each of the tasks, their responsibilities, and the reporting relationships between project construction management and the mitigation and monitoring team. 5. A description of the manner in which Native American observers or monitors will be included, the procedures to be used to select them, and their role and responsibilities. 6. A description of all impact-avoidance measures (such as flagging or fencing) to prohibit or otherwise restrict access to sensitive resource areas that are to be avoided during ground disturbance, construction, and/or operation, and identification of areas where these measures are to be implemented. The description shall address how these measures would be implemented prior to the start of ground disturbance and how long they would be needed to protect the resources from project related effects. 7. A statement that all encountered cultural resources over 50 years old shall be recorded on DPR 523 forms and mapped and photographed. In addition, all archaeological materials retained as a result of the archaeological investigations (survey, testing, data recovery) shall be curated in accordance with the California State Historical Resources Commission's (SHRC) Guidelines for the Curation of Archaeological Collections (SHRC 1993), into a retrievable storage collection in a public repository or museum. 8. A statement that the project owner will pay all curation fees for artifacts recovered and for related documentation produced during cultural resources investigations conducted for the project. The project owner shall identify three possible curation facilities that could accept cultural resources materials resulting from project activities. 9. A statement demonstrating when and how the project owner will comply with Health and Human Safety Code, section 7050.5(b) and Public Resources Code, section 5097.98(b) and (e), including the statement that the project owner will notify the CPM and the NAHC of the discovery of human remains. 10. A statement that the CRS has access to equipment and supplies necessary for site mapping, photography, and recovery of any cultural resource materials that are encountered during ground disturbance and cannot be treated prescriptively. 11. A description of the contents, format, and review and approval process of the final cultural resources report (CRR), which shall be prepared according to Archaeological Resource Management Report (ARMR) guidelines.	1. Upon approval of the CRS proposed by the project owner, the CPM will provide to the project owner an electronic copy of the draft model CRMMP for the CRS. 2. At least 30 days prior to the start of Cultural Resources Ground Disturbances, the project owner shall submit the CRMMP to the CPM for review and approval. 3. At least 30 days prior to the start of Cultural Resources Ground Disturbances, in a letter to the CPM, the project owner shall agree to pay curation fees for any materials generated or collected as a result of the archaeological investigations (survey, testing, and data recovery). 4. Within 90 days after completion of Cultural Resources Ground Disturbances (including landscaping), if cultural materials requiring curation were generated or collected, the project owner shall provide to the CPM a copy of an agreement with, or other written commitment from, a curation facility that meets the standards stated in SHRC (1993), to accept the cultural materials from this project. Any agreements concerning curation will be retained and available for audit for the life of the project.	The site's CRMMP has already been approved by the CEC and will be implemented as required. The site has previously agreed to pay curation fees, if archaeological materials are discovered. A written agreement from a Curation Facility will be submitted 90 days following project completion, if archaeological materials are discovered.
Cultural Resources	CUL-4	Final Cultural Resources Report (CRR)	The project owner shall submit the final cultural resources report (CRR) to the CPM for approval. The final CRR shall be written by, or under the direction of, the CRS and shall be provided in the ARMR format. The final CRR shall report on all field activities including dates, times and locations, results, samplings, and analyses. The final CRR shall be a confidential document if it describes or maps the location(s) of cultural resources. All survey reports, DPR 523 forms, data recovery reports, and any additional research reports not previously submitted to the California Historical Resources Information System (CHRIS) shall be included as appendices to the final CRR. If the project owner requests a suspension of ground disturbance and/or construction activities for more than 30 days, then a draft CRR that covers all cultural resources activities associated with the project shall be prepared by the CRS and submitted to the CPM for review and approval. The draft CRR shall be retained at the project site in a secure facility until ground disturbance and/or construction resumes or the project is withdrawn. If the project is withdrawn, then a final CRR shall be submitted to the CPM for review and approval.	1. Within 30 days after requesting a suspension of construction activities, the project owner shall submit a draft CRR to the CPM for review and approval. 2. Within 90 days after completion of ground disturbance (including landscaping), the project owner shall submit the final CRR to the CPM for review and approval. If any reports have previously been sent to the CHRIS, then receipt letters from the CHRIS or other verification of receipt shall be included in an appendix. 3. Within 10 days after CPM approval of the CRR, the project owner shall provide documentation to the CPM confirming that copies of the final CRR have been provided to the State Historic Preservation Officer, the CHRIS, the curating institution, if archaeological materials were collected, and to the tribal chairpersons of any Native American groups requesting copies of project-related reports.	A CRR will be submitted within 90 days of project completion in the format of a technical memorandum. The CRR will be submitted to CRHIS 10 days following CPM approval of the CRR, if archaeological materials are discovered.
Cultural Resources	CUL-5	Cultural Resources Worker Environmental Awareness Program (WEAP)	Prior to and for the duration of Cultural Resources Ground Disturbances, the project owner shall provide Worker Environmental Awareness Program (WEAP) training to all new workers within their first week of employment at the project site, along the linear facilities routes, and at laydown areas, roads, and other ancillary areas. The cultural resources part of this training shall be prepared by the CRS, may be conducted by any member of the archaeological team, and may be presented in the form of a video. The CRS is encouraged to include a Native American presenter in the training to contribute the Native American perspective on archaeological and ethnographic resources. During the training and during construction, the CRS shall be available (by telephone or in person) to answer questions posed by employees. The training may be discontinued when ground disturbance is completed or suspended, but must be resumed when ground disturbance, such as landscaping, resumes.	The training shall include: 1. A discussion of applicable laws and penalties under law; 2. Samples or visuals of artifacts that might be found in the project vicinity; 3. A discussion of what such artifacts may look like when partially buried, or wholly buried and then freshly exposed; 4. A discussion of what prehistoric and historical archaeological deposits look like at the surface and when exposed during construction, and the range of variation in the appearance of such deposits; 5. Instruction that the CRS, alternate CRS, and CRMs have the authority to halt ground disturbance in the area of a discovery to an extent sufficient to ensure that the resource is protected from further impacts, as determined by the CRS; 6. Instruction that employees, if the CRS, alternate CRS, or CRMs are not present, are to halt work on their own in the vicinity of a potential cultural resources discovery, and shall contact their supervisor and the CRS or CRM, and that redirection of work would be determined by the construction supervisor and the CRS; 7. An informational brochure that identifies reporting procedures in the event of a discovery; 8. An acknowledgement form signed by each worker indicating that they have received the training; and 9. A sticker that shall be placed on hard hats indicating that environmental training has been completed. 10. No ground disturbance shall occur prior to implementation of the WEAP program, unless such activities are specifically approved by the CPM. 11. At least 30 days prior to the beginning of ground disturbance, the CRS shall provide the cultural resources WEAP training program draft text and/or training video, including Native American participation, and graphics and the informational brochure to the CPM for review and approval. 12. At least 15 days prior to the beginning of ground disturbance, the CPM will provide to the project owner a WEAP Training Acknowledgement form for each WEAP-trained worker to sign. 13. Monthly, until ground disturbance is completed, the project owner shall provide in the Monthly Compliance Report (MCR) the WEAP Training Acknowledgement forms of workers who have completed the training in the prior month and a running total of all persons who have completed training to date.	WEAP training for the site was previously approved by the CEC and will be implemented as required. Instead of filing MCRs, one report covering the entire construction duration will be submitted 30 days after project completion.

Sewer Interconnection Upgrades Compliance Matrix
Huntington Beach Energy Project (12-AFC-02C)
List of Applicable Conditions of Certification

Technical Area	COC No.	Title	Condition of Certification Description	Compliance Verification	Comments
Cultural Resources	CUL-6	Undiscovered Cultural Resources	In the event that a CRHR eligible (as determined by the CPM) cultural resource is discovered, at the direction of the CPM, the project owner shall ensure that the CRS or alternate CRS monitors full time all ground disturbances in the area where the CRHR-eligible cultural resources discovery has been made. The level, duration, and spatial extent of monitoring shall be determined by the CPM. In the event that the CRS believes that a current level of monitoring is not appropriate, a letter or email detailing the justification for changing the level of monitoring shall be provided to the CPM for review and approval prior to any change in the level of monitoring. Full-time archaeological monitoring for the project, if deemed necessary due to the discovery of a CRHR-eligible cultural resource, shall consist of archaeological monitoring of all earth-moving activities in the area(s) of discovery(ies), for as long as the CPM requires. The project owner shall obtain the services of one or more NAMs to monitor construction-related ground disturbance in areas, if any, where Native American artifacts have been discovered. Contact lists of interested Native Americans and guidelines for monitoring shall be obtained from the NAHC. Preference in selecting a NAM shall be given to Native Americans with traditional ties to the area that shall be monitored. If efforts to obtain the services of a qualified NAM are unsuccessful, the project owner shall immediately inform the CPM. The CPM will either identify potential monitors or will allow construction-related ground disturbance to proceed without an NAM. If monitoring should be needed, as determined by the CPM, due to the discovery of a CRHR-eligible cultural resource, the CRS shall keep a daily log of any monitoring and other cultural resources activities and any instances of non-compliance with the conditions and/or applicable LORS on forms provided by the CPM. Copies of the daily monitoring logs shall be provided by the CRS to the CPM, if requested by the CPM. From these logs, the CRS shall compile a monthly monitoring summary report to be included in the MCR. If there are no monitoring activities, the summary report shall specify why monitoring has been suspended. The CRS, at his or her discretion, or at the request of the CPM, may informally discuss cultural resource monitoring and mitigation activities with Energy Commission technical staff. Cultural resources monitoring activities are the responsibility of the CRS. Any interference with monitoring activities, removal of a monitor from duties assigned by the CRS, or direction to a monitor to relocate monitoring activities by anyone other than the CRS shall be considered non-compliance with these conditions. Upon becoming aware of any incidents of non-compliance with the conditions and/or applicable LORS, the CRS and/or the project owner shall notify the CPM by telephone or e-mail within 24 hours. The CRS shall also recommend corrective action to resolve the problem or achieve compliance with the conditions. When the issue is resolved, the CRS shall write a report describing the issue, the resolution of the issue, and the effectiveness of the resolution measures. This report shall be provided in the next MCR for the review of the CPM. The research design in the CRMMP shall govern the collection, treatment, retention/disposal, and curation of any archaeological materials encountered. The daily monitoring logs shall at a minimum include the following: • First and last name of the CRM and any accompanying NAM. • Time in and out. • Weather. Specify if weather conditions led to work stoppages. • Work location (project component). Provide specifics—e.g., power block, landscaping. • Proximity to site location. Specify if work conducted within 1000 feet of a known cultural resource. • Work type (machine). • Work crew (company, operator, foreman). • Depth of excavation. • Description of work. • Stratigraphy. • Artifacts, listed with the following identifying features: Field artifact #: When recording artifacts in the daily monitoring logs, the CRS shall institute a field numbering system to reduce the likelihood of repeat artifact numbers. A typical numbering system could include a project abbreviation, monitor's initials, and a set of numbers given to that monitor: e.g., HBEP-MB-123. Description. Measurements. Universal Transverse Mercator coordinates. Whether artifacts are likely to be isolates or components of larger resources. Assessment of significance of any finds. Actions taken. • Plan for the next work day. • A cover sheet shall be submitted with each day's monitoring logs, and shall at a minimum include the following: Count and list of first and last names of all CRMs and of all NAMs for that day. General description (in paragraph form) of that day's overall monitoring efforts, including monitor names and locations. Any reasons for halting work that day. Count and list of all artifacts found that day: include artifact #, location (i.e., grading in Unit X), measurements, UTM's, and very brief description (i.e., historic can, granitic biface, quartzite flake). Whether any artifacts were found out of context (i.e., in fill, caisson drilling, flood debris, spoils pile). • If requested by the CPM, copies of the daily monitoring logs and cover sheets shall be provided by email from the CRS to the CPM, as follows: Each day's monitoring logs and cover sheet shall be merged into one PDF document. The PDF title and headings, and emails shall clearly indicate the date of the applicable monitoring logs. PDF's for any revised or resubmitted versions shall use the word "revised" in the title. • Daily and/or weekly maps shall be submitted along with the monitoring logs as follows: The CRS shall provide daily and/or weekly maps of artifacts at the request of the CPM. A map shall also be provided if artifact locations show complexity, high density, or other unique considerations. Maps shall include labeled artifacts, project boundaries, previously recorded sites and isolates, aerial imagery background, and appropriate scales. • The Cultural Resources section of the MCR shall be prepared in coordination with the CRS, and shall include a monthly summary report of cultural resources-related monitoring. The summary shall: List the number of CRMs and NAMs on a daily basis, as well as provide monthly monitoring-day totals. Give an overview of cultural resource monitoring work for that month, and discuss any issues that arose. Describe fulfillment of requirements of each cultural mitigation measure. Summarize the confidential appendix to the MCR, without disclosing any specific confidential details. Include the artifact concordance table, but with removal of UTM's. Contain completed DPR 523A forms for all artifacts recorded or collected in that month shall be submitted as one combined PDF that includes an index and bookmarks. For any artifact without a corresponding DPR form, the CRS shall specify why the DPR form is not applicable or pending (i.e. as part of a larger site update). A concordance table that matches field artifact numbers with the artifact numbers used in the DPR forms shall be included. The sortable table shall contain each artifact's date of collection and UTM numbers, and note if an artifact has been deaccessioned or otherwise does not have a corresponding DPR form. Any post-field log recordation changes to artifact numbers shall also be noted. If artifacts from a given site location (in close proximity of each other or an existing site) are collected month after month, and if agreed upon with the CPM, a final updated DPR for the site may be submitted at the completion of monitoring. The monthly concordance table shall note that the DPR form for the included artifacts is pending.	1. At least 30 days prior to the start of ground disturbance, the CPM will provide to the CRS an electronic copy of a form to be used as a daily monitoring log. 2. While monitoring is on-going and as required by the CPM, the project owner shall submit each day's monitoring logs and cover sheet merged into one PDF document by email within 24 hours. 3. The CRS and/or project owner shall notify the CPM of any incidents of noncompliance with the conditions and/or applicable LORS by telephone or email within 24 hours. 4. If resources are discovered as outlined in this condition of certification, the project owner shall notify all local Native American groups of the discovery of the resource within 48 hours of its discovery. If resources are discovered as outlined in this condition of certification, the project owner shall appoint one or more NAMs. Within 15 days of receiving from a local Native American group a request that a NAM be employed, the project owner shall submit a copy of the request and a copy of a response letter to the CPM. The project owner shall include a copy of this condition of certification in any response letter. 5. While monitoring is on-going, the project owner shall include in each MCR a copy of the monthly summary of cultural resources related monitoring prepared by the CRS and shall attach any new DPR 523A forms completed for finds treated prescriptively, as specified in the CRMMP. 6. Final updated DPRs with sites (where artifacts are collected month after month) can be submitted at the completion of monitoring, as agreed upon with the CPM. 7. At least 24 hours prior to implementing a proposed change in monitoring level, the project owner shall submit to the CPM, for review and approval, a letter or email detailing the CRS's justification for changing the monitoring level. 8. Within 15 days of receiving them, the project owner shall submit to the CPM copies of any comments or information provided by Native Americans in response to the project owner's transmittals of information.	A copy of the Daily Monitoring Log proposed for use will be submitted 30 days prior to the start of ground disturbance, if monitoring is required. Daily Monitoring Logs will be submitted within 24 hours, if monitoring is required. Notification will be provided within 24 hours of a non-compliance event. Notification will be provided within 24 hours of a proposed change in monitoring. Instead of filing MCRs, one report covering the entire construction duration will be submitted 30 days after project completion.
			The CRS shall have the authority to halt ground disturbance in the event of a discovery. Redirection of ground disturbance shall be accomplished under the direction of the construction supervisor in consultation with the CRS. In the event that a cultural resource over 50 years of age is found (or if younger, determined exceptionally significant by the CRS), or impacts to such a resource can be anticipated, ground disturbance shall be halted or redirected in the immediate vicinity of the discovery sufficient to ensure that the resource is protected from further impacts. If the discovery includes human remains, the project owner shall comply with the requirements of Health and Human Safety Code, section 7050.5(b) and notify the CPM and the NAHC of the discovery of human remains. No action with respect to the disposition of human remains of Native American origin shall be initiated without direction from the CPM. Monitoring, including Native American monitoring, and daily reporting, as provided in other conditions, shall continue during the project's ground disturbing activities on other areas of the project site, while the halting or redirection of ground disturbance in the vicinity of the discovery shall remain in effect until the CRS has visited the discovery, and all of the following have occurred: 1. The CRS has notified the project owner, and the CPM has been notified within 24 hours of the discovery, or by Monday morning if the cultural resources discovery occurs between 8:00 AM on Friday and 8:00 AM on Sunday, and provided a description of the discovery (or changes in character or attributes), the action taken (i.e., work stoppage or redirection), a recommendation of CRHR/NRHP eligibility, and recommendations for data recovery from any cultural resources discoveries, whether or not a determination of CRHR/NRHP eligibility has been made. 2. If the discovery would be of interest to Native Americans, the CRS has notified all Native American groups that expressed a desire to be notified in the event of such a discovery. 3. The CRS has completed field notes, measurements, and photography for a DPR 523 "Primary Record" form. Unless the find can be treated prescriptively, as specified in the CRMMP, the "Description" entry of the DPR 523 "Primary Record" form shall include a recommendation on the CRHR/NRHP eligibility of the discovery. The project owner shall submit completed forms to the CPM. 4. The CRS, the project owner, and the CPM have conferred, and the CPM has concurred with the recommended eligibility of the discovery and approved the CRS's proposed data recovery, if any, including the curation of the artifacts, or other appropriate mitigation; and any necessary data recovery and mitigation have been completed. 5. Ground disturbance may resume only with the approval of the CPM.	1. At least 30 days prior to the start of ground disturbance, the project owner shall provide the CPM and CRS with a letter confirming that the CRS, alternate CRS, and CRMs have the authority to halt ground disturbance in the vicinity of a cultural resources discovery, and that the project owner shall ensure that the CRS notifies the CPM within 24 hours of a discovery, or by Monday morning if the cultural resources discovery occurs between 8:00 AM on Friday and 8:00 AM on Sunday. 2. Unless the discovery can be treated prescriptively, as specified in the CRMMP, completed DPR 523 forms for resources newly discovered during ground disturbance shall be submitted to the CPM for review and approval no later than 24 hours following the notification of the CPM, or 48 hours following the completion of data recordation/recovery, whichever the CRS decides is more appropriate for the subject cultural resource. 3. Within 48 hours of the discovery of a resource of interest to Native Americans, the project owner shall ensure that the CRS notifies all Native American groups that expressed a desire to be notified in the event of such a discovery, and the CRS must inform the CPM when the notifications are complete. 4. No later than 30 days following the discovery of any Native American cultural materials, the project owner shall submit to the CPM copies of the information transmittal letters sent to the chairpersons of the Native American tribes or groups who requested the information. Additionally, the project owner shall submit to the CPM copies of letters of transmittal for all subsequent responses to Native American requests for notification, consultation, and reports and records. 5. Within 15 days of receiving them, the project owner shall submit to the CPM copies of any comments or information provided by Native Americans in response to the project owner's transmittals of information.	Notice of the CRS's authority to halt work will be provided 30 days prior to the start of ground disturbance. Notification will be provided within 24 hours of discovery, as applicable.
			If fill soils must be acquired from a non-commercial borrow site or disposed of to a non-commercial disposal site, the CRS shall survey the borrow or disposal site(s) for cultural resources and record on DPR 523 forms any that are identified. This survey shall not be required if there is a survey of the location that is less than five years old and if the site is approved by the CPM. When any non-commercial borrow site or non-commercial disposal site survey is completed, the CRS shall convey the results and recommendations for further action to the project owner and the CPM. The CPM shall determine, in his/her sole discretion, whether significant archaeological resources that cannot be avoided are present at the borrow or disposal site. If the CPM determines that significant archaeological resources that cannot be avoided are present at the borrow or disposal site, the project owner must either select another borrow or disposal site or implement CUL-7 prior to any use of the site. The CRS shall report on the methods and results of these surveys in the final CRR.	1. As soon as the project owner knows that a non-commercial borrow site and/or disposal site will be used, he/she shall notify the CRS and CPM and provide documentation of previous archaeological survey, if any, dating within the past five years, for CPM approval. 2. In the absence of documentation of recent archaeological survey, at least 30 days prior to any soil borrow or disposal activities on the non-commercial borrow and/or disposal sites, the CRS shall survey the site(s) for archaeological resources. The CRS shall notify the project owner and the CPM of the results of the cultural resources survey, with recommendations, if any, for further action.	Notification will be provided 30 days prior to use of any new non-commercial borrow or disposal site, if applicable.
			No worker shall excavate or perform any ground disturbance activity prior to receiving CPM-approved WEAP training by the PRS, unless specifically approved by the CPM. Prior to project kick-off and ground disturbance, the following workers shall be WEAP trained by the PRS in-person: project managers, construction supervisors, foremen, and all general workers involved with or who operate ground-disturbing equipment or tools. Following project kick-off, a CPM-approved video or in-person training may be used for new employees. The training program may be combined with other training programs prepared for cultural and biological resources, hazardous materials, or other areas of interest or concern. A WEAP certification of completion form shall be used to document who has received the required training.	(1) In the Monthly Compliance Report (MCR), the project owner shall provide copies of the WEAP certification of completion forms with the names of those trained and the trainer or type of training (in-person and/or video) offered that month. The MCR shall also include a running total of all persons who have completed the training to date. (2) If the project owner requests an alternate paleontological WEAP trainer, the resume and qualifications of the trainer shall be submitted to the CPM for review and approval prior to installation of an alternate trainer. Alternate trainers shall not conduct WEAP training prior to CPM authorization.	Instead of filing MCRs, one report covering the entire construction duration will be submitted 30 days after project completion.
			The project owner shall ensure that the PRS and PRM(s) monitor, consistent with the PRMMP, all construction-related grading, excavation, trenching, and augering in areas where potential fossil-bearing materials have been identified, both at the site and along any constructed linear facilities associated with the project. In the event that the PRS determines full-time monitoring is not necessary in locations that were identified as potentially fossil-bearing in the PRMMP, the project owner shall notify and seek the concurrence of the CPM. The project owner shall ensure that the PRS and PRM(s) have the authority to stop or redirect construction if paleontological resources are encountered. The project owner shall ensure that there is no interference with monitoring activities unless directed by the PRS. Monitoring activities shall be conducted as follows: 1. Any change of monitoring from the accepted schedule in the PRMMP shall be proposed in a letter or email from the PRS and the project owner to the CPM prior to the change in monitoring and be included in the monthly compliance report. The letter or email shall include the justification for the change in monitoring and be submitted to the CPM for review and approval. 2. The project owner shall ensure that the PRM(s) keep a daily monitoring log of paleontological resource activities, and copies of these logs shall be submitted with the MCR. The PRS may informally discuss paleontological resource monitoring and mitigation activities with the CPM at any time. 3. The project owner shall ensure that the PRS notifies the CPM within 24 hours of the occurrence of any incidents of non-compliance with any paleontological resources conditions of certification. The PRS shall recommend corrective action to resolve the issues or achieve compliance with the conditions of certification. 4. For any significant paleontological resources encountered, either the project owner or the PRS shall notify the CPM within 24 hours, or Monday morning in the case of a weekend event, when construction has been stopped because of a paleontological find. The project owner shall ensure that the PRS prepares a summary of monitoring and other paleontological activities that will be included in each MCR. The summary will include the name(s) of PRS or PRM(s) active during the month, general descriptions of training and monitored construction activities, and general locations of excavations, grading, and other activities. A section of the report shall include the geologic units or subunits encountered, descriptions of samplings within each unit, and a list of identified fossils. Negative findings, when no fossils are identified, shall also be reported. A final section of the report will address any issues or concerns about the project relating to paleontological monitoring, including any incidents of non-compliance or any changes to the monitoring plan that have been approved by the CPM. If no monitoring took place during the month, the report shall include an explanation in the summary as to why monitoring was not conducted.	The project owner shall ensure that the PRS submits the summary of monitoring and paleontological activities in the MCR. When feasible, the CPM shall be notified 10 days in advance of any proposed changes in monitoring different from that identified in the PRMMP. If there is any unforeseen change in monitoring, the notice shall be given as soon as possible prior to implementation of the change.	Notification will be provided 10 days prior to a proposed change in monitoring. Instead of filing MCRs, one report covering the entire construction duration will be submitted 30 days after project completion.
Paleontological Resources	PAL-7	Paleontological Resources Report (PRR)	The project owner shall ensure preparation of a Paleontological Resources Report (PRR) by the designated PRS. The PRR shall be prepared following completion of ground-disturbing activities. The PRR shall include an analysis of the collected fossil materials and related information, and shall be submitted to the CPM for approval. The report shall include, but not be limited to, a description and inventory of recovered fossil materials; a map showing the location of paleontological resources encountered; and the PRS' description of sensitivity and significance of those resources.	Within 90 days after completion of ground-disturbing activities, including landscaping, the project owner shall submit the PRR under confidential cover to the CPM.	A PRR will be submitted within 90 days of project completion in the format of a technical memorandum.
Paleontological Resources	PAL-8	Disposition of Fossil Material	The project owner, through the designated PRS, shall ensure that all components of the PRMMP are adequately performed, including collection of fossil material, preparation of fossil material for analysis, analysis of fossils, identification and inventory of fossils, preparation of fossils for curation, and delivery for curation of all significant paleontological resource materials encountered and collected during project construction. The project owner shall pay all curation fees charged by the museum for fossil material collected and curated as a result of paleontological mitigation. The project owner shall also provide the curator with documentation showing the project owner irrevocably and unconditionally donates, gives, and assigns permanent, absolute, and unconditional ownership of the fossil material.	Within 60 days after the submittal of the PRR, the project owner shall submit documentation to the CPM identifying the entity that will be responsible for curating collected specimens. This document shall also show that fees have been paid for curation and the owner relinquishes control and ownership of all fossil material.	Documentation will be filed within 60 days of submittal of the PRR only if paleontological materials are identified during ground disturbance.

Sewer Interconnection Upgrades Compliance Matrix
Huntington Beach Energy Project (12-AFC-02C)
List of Applicable Conditions of Certification

Technical Area	COC No.	Title	Condition of Certification Description	Compliance Verification	Comments
Soil and Water Resources	SOIL&WATER-6	Water Use and Reporting	Water supply for project operation and construction shall be potable water supplied from the city of Huntington Beach. Water use for operation of the Huntington Beach Energy Project shall not exceed 120 AFY; water use for construction shall not exceed 22 AFY. A monthly summary of water use shall be submitted to the CPM.	The project owner shall record HBEP operation water use on a daily basis and shall notify the CPM within 14 days upon forecast to exceed the maximum annual use as described above. Prior to exceeding the maximum use, the owner shall provide a plan to modify operations. The project owner shall record HBEP construction water use on a daily basis and shall notify the CPM within 14 days upon forecast to exceed the maximum annual use of 22 AFY of potable water. Prior to exceeding the maximum use, the owner shall provide a plan to modify construction practices or offset excess water use. The project owner shall submit a water use summary report to the CPM monthly during construction and annually in the ACR during operations for the life of the project. The annual report shall include calculated monthly range, monthly average, daily maximum within each month and annual use by the project in both gallons per minute and acre-feet. After the first year and for subsequent years, this information shall also include the yearly range and yearly average potable water used by the project.	Water use during construction is expected to be minimal. As such, it will be managed consistent with the site's operational limits and addressed in the site's Annual Compliance Report for operations.
Traffic and Transportation	TRANS-3	Traffic Control Plan	The project owner shall prepare and implement a Traffic Control Plan (TCP) for the HBEP's construction and operations traffic. The TCP shall address the movement of workers, vehicles, and materials, including arrival and departure schedules, designated workforce and delivery routes, and the operations of shuttle(s) from offsite parking areas. The project owner shall consult with Caltrans and all applicable local jurisdictions, including, but not limited to, Orange County, Los Angeles County, and the cities of Huntington Beach, Long Beach, and Seal Beach, in the preparation and implementation of the TCP. The project owner shall submit the proposed TCP to Caltrans and applicable local jurisdictions in sufficient time for review and comment, and to the CPM for review and approval prior to the proposed start of demolition and construction and implementation of the plan. The Traffic Control Plan shall include: - Provisions for redirection of construction traffic with a flag person as necessary to ensure traffic safety and minimize interruptions to non-construction related traffic flow; - Placement of necessary signage, lighting, and traffic control devices at the project construction site and lay-down areas; - A heavy-haul plan addressing the transport and delivery of heavy and oversized loads requiring permits from the California Department of Transportation (Caltrans), other state or federal agencies, and/or the affected local jurisdictions including Los Angeles county, Orange county, city of Long Beach, city of Seal Beach, and city of Huntington Beach; - Location and details of construction along affected roadways at night, where permitted; - Temporary closure of travel lanes or disruptions to street segments and intersections during construction activities; - Traffic diversion plans (in coordination all applicable local jurisdictions and Caltrans) to ensure access during temporary lane/road closures; - Access to residential and/or commercial property located near construction work and truck traffic routes; - Assurance of access for emergency vehicles to the project site; - Advance notification to residents, businesses, emergency providers, and hospitals that would be affected when roads may be partially or completely closed; - Identification of safety procedures for exiting and entering the site access gate; 11.Parking/Staging Plan for all phases of project construction and operation to require all project-related parking to be on-site or in designated off-site parking areas. The Parking/Staging Plan shall identify operation time(s) and route(s) for shuttle(s) from offsite parking areas. The Parking/Staging Plan shall prohibit use of the Huntington Beach City parking area unless the CPM determines that there are insufficient parking spaces available at the other parking facilities identified in this Decision. 12. Timing of truck deliveries to the former Plains site shall occur between the hours of 7 a.m. and 9 p.m. on weekdays and Saturdays only.	At least 60 calendar days prior to the start of construction, the project owner shall submit the TCP to the applicable agencies for review and comment and to the CPM for review and approval. The project owner shall also provide the CPM with a copy of the transmittal letter to the agencies requesting review and comment. At least 30 calendar days prior to the start of construction, the project owner shall provide copies of any comment letters received from the agencies, along with any changes to the proposed development plan, to the CPM for review and approval.	The site's TCP has already been approved by the CEC and will be implemented, as required.
Waste Management	WASTE-7	Operation Waste Management Plan	The project owner shall prepare an Operation Waste Management Plan for all wastes generated during operation of the facility and shall submit the plan to the CPM for review and approval. The plan shall contain, at a minimum, the following: • a detailed description of all operation and maintenance waste streams, including projections of amounts to be generated, frequency of generation, and waste hazard classifications; • management methods to be used for each waste stream, including temporary on-site storage, housekeeping and best management practices to be employed, treatment methods and companies providing treatment services, waste testing methods to assure correct classification, methods of transportation, disposal requirements and sites, and recycling and waste minimization/source reduction plans; • information and summary records of conversations with the local Certified Unified Program Agency and the Department of Toxic Substances Control regarding any waste management requirements necessary for project activities. Copies of all required waste management permits, notices, and/or authorizations shall be included in the plan and updated as necessary; • a detailed description of how facility wastes will be managed and any contingency plans to be employed, in the event of an unplanned closure or planned temporary facility closure; and • a detailed description of how facility wastes will be managed and disposed upon closure of the facility.	The project owner shall submit the Operation Waste Management Plan to the CPM for approval no less than 30 days prior to the start of project operation. The project owner shall submit any required revisions to the CPM within 20 days of notification from the CPM that revisions are necessary. The project owner shall also document in each Annual Compliance Report the actual volume of wastes generated and the waste management methods used during the year; provide a comparison of the actual waste generation and management methods used to those proposed in the original Operation Waste Management Plan; and update the Operation Waste Management Plan as necessary to address current waste generation and management practices.	Wastes generated during construction will be managed consistent with the site's Operation Waste Management Plan and addressed in the site's Annual Compliance Report for operations.

Attachment 3.1

CalEEMod Report of Results



HBEP-Sewer Upgrade v3 Detailed Report

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 - 3.2.2. Offsite - Unmitigated
- 4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

8.1. Justifications

8.3. Land Use

8.4. Construction

8.4.1. Construction Phases

8.4.2. Off-Road Equipment

8.4.4. Dust from Material Movement

8.4.6. Trips and VMT

8.4.7. On-Road Fugitive Dust

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	HBEP-Sewer Upgrade v3
Construction Start Date	1/4/2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50000
Precipitation (days)	19.2000
Location	33.64396418778938, -117.9790454615968
County	Orange
City	Huntington Beach
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5800
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.45

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Light Industry	24.0150	1000sqft	0.55000	0.00000	0.00000	0.00000	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.06803	0.88578	8.04614	9.31243	0.01577	0.31733	4.78365	5.10098	0.29211	2.54774	2.83984	1,949.68	0.07935	0.05133	1,966.99
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.13413	0.11131	1.00658	1.23059	0.00201	0.03902	0.57030	0.60933	0.03592	0.30172	0.33764	253.020	0.01017	0.00649	255.276
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.02448	0.02031	0.18370	0.22458	0.00037	0.00712	0.10408	0.11120	0.00656	0.05506	0.06162	41.8904	0.00168	0.00108	42.2638

2.2. Construction Emissions by Year

2.2.1. Total Construction Emissions by Year, Unmitigated

Includes both onsite and offsite emissions.

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.06803	0.88578	8.04614	9.31243	0.01577	0.31733	4.78365	5.10098	0.29211	2.54774	2.83984	1,949.68	0.07935	0.05133	1,966.99
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.13413	0.11131	1.00658	1.23059	0.00201	0.03902	0.57030	0.60933	0.03592	0.30172	0.33764	253.020	0.01017	0.00649	255.276
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.02448	0.02031	0.18370	0.22458	0.00037	0.00712	0.10408	0.11120	0.00656	0.05506	0.06162	41.8904	0.00168	0.00108	42.2638

2.2.2. Onsite Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
2027	0.99751	0.83680	7.76762	8.52570	0.01430	0.31534	4.51798	4.83333	0.29012	2.48300	2.77312	1,548.67	0.06432	0.01357	1,554.32
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.12403	0.10397	0.97098	1.11029	0.00184	0.03879	0.53230	0.57109	0.03568	0.29253	0.32822	198.703	0.00832	0.00179	199.444
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.02264	0.01898	0.17720	0.20263	0.00034	0.00708	0.09715	0.10422	0.00651	0.05339	0.05990	32.8976	0.00138	0.00030	33.0202

2.2.3. Offsite Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.07052	0.04898	0.27852	0.78673	0.00147	0.00199	0.26567	0.26765	0.00199	0.06473	0.06672	401.009	0.01503	0.03776	412.666
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.01010	0.00734	0.03560	0.12029	0.00017	0.00023	0.03800	0.03823	0.00023	0.00919	0.00942	54.3168	0.00185	0.00471	55.8319
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.00184	0.00134	0.00650	0.02195	0.00003	0.00004	0.00694	0.00698	0.00004	0.00168	0.00172	8.99277	0.00031	0.00078	9.24361

3. Construction Emissions Details

3.1. Site Preparation (2027)

3.1.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11557	0.09711	0.99074	1.91149	0.00268	0.02982	—	0.02982	0.02744	—	0.02744	290.314	0.01178	0.00236	291.310
Onsite truck	0.00289	0.00104	0.03146	0.02224	0.00007	0.00004	0.00090	0.00095	0.00004	0.00025	0.00030	6.47727	0.00176	0.00106	6.83688
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00633	0.00532	0.05429	0.10474	0.00015	0.00163	—	0.00163	0.00150	—	0.00150	15.9076	0.00065	0.00013	15.9622
Onsite truck	0.00017	0.00006	0.00169	0.00120	< 0.000005	< 0.000005	0.00005	0.00005	< 0.000005	0.00001	0.00002	0.35332	0.00010	0.00006	0.37317
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00116	0.00097	0.00991	0.01911	0.00003	0.00030	—	0.00030	0.00027	—	0.00027	2.63369	0.00011	0.00002	2.64273
Onsite truck	0.00003	0.00001	0.00031	0.00022	< 0.000005	< 0.000005	0.00001	0.00001	< 0.000005	< 0.000005	< 0.000005	0.05850	0.00002	0.00001	0.06178

3.1.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03329	0.02833	0.03064	0.42527	0.00000	0.00000	0.13071	0.13071	0.00000	0.03064	0.03064	121.843	0.00154	0.00474	123.305
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00181	0.00155	0.00189	0.02430	0.00000	0.00000	0.00707	0.00707	0.00000	0.00166	0.00166	6.76750	0.00008	0.00026	6.85663
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00033	0.00028	0.00035	0.00443	0.00000	0.00000	0.00129	0.00129	0.00000	0.00030	0.00030	1.12044	0.00001	0.00004	1.13519
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2. Grading (2027)

3.2.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

HBEP-Sewer Upgrade v3 Detailed Report, 7/8/2026

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.99462	0.83576	7.73616	8.50346	0.01424	0.31530	—	0.31530	0.29008	—	0.29008	1,542.19	0.06256	0.01251	1,547.48
Dust From Material Movement	—	—	—	—	—	—	4.51708	4.51708	—	2.48275	2.48275	—	—	—	—
Onsite truck	0.00289	0.00104	0.03146	0.02224	0.00007	0.00004	0.00090	0.00095	0.00004	0.00025	0.00030	6.47727	0.00176	0.00106	6.83688
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11717	0.09846	0.91138	1.00178	0.00168	0.03714	—	0.03714	0.03417	—	0.03417	181.683	0.00737	0.00147	182.306
Dust From Material Movement	—	—	—	—	—	—	0.53215	0.53215	—	0.29249	0.29249	—	—	—	—
Onsite truck	0.00036	0.00013	0.00362	0.00258	0.00001	0.00001	0.00011	0.00011	0.00001	0.00003	0.00003	0.75964	0.00021	0.00012	0.80231
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02138	0.01797	0.16633	0.18282	0.00031	0.00678	—	0.00678	0.00624	—	0.00624	30.0796	0.00122	0.00024	30.1829

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Dust From Material Movement	—	—	—	—	—	—	0.09712	0.09712	—	0.05338	0.05338	—	—	—	—
Onsite truck	0.00006	0.00002	0.00066	0.00047	< 0.000005	< 0.000005	0.00002	0.00002	< 0.000005	0.00001	0.00001	0.12577	0.00003	0.00002	0.13283

3.2.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05326	0.04533	0.04903	0.68043	0.00000	0.00000	0.20914	0.20914	0.00000	0.04902	0.04902	194.949	0.00247	0.00758	197.287
Vendor	0.00965	0.00249	0.12797	0.06238	0.00090	0.00090	0.03422	0.03512	0.00090	0.00946	0.01035	123.204	0.00617	0.01681	128.374
Hauling	0.00761	0.00117	0.10152	0.04391	0.00057	0.00109	0.02231	0.02340	0.00109	0.00626	0.00734	82.8568	0.00639	0.01337	87.0046
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00623	0.00534	0.00650	0.08359	0.00000	0.00000	0.02433	0.02433	0.00000	0.00570	0.00570	23.2802	0.00029	0.00089	23.5868
Vendor	0.00115	0.00030	0.01517	0.00726	0.00011	0.00011	0.00399	0.00410	0.00011	0.00110	0.00121	14.5100	0.00073	0.00198	15.1332
Hauling	0.00091	0.00014	0.01203	0.00515	0.00007	0.00013	0.00260	0.00273	0.00013	0.00073	0.00086	9.75910	0.00075	0.00158	10.2553
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00114	0.00097	0.00119	0.01526	0.00000	0.00000	0.00444	0.00444	0.00000	0.00104	0.00104	3.85430	0.00005	0.00015	3.90507

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Vendor	0.00021	0.00006	0.00277	0.00132	0.00002	0.00002	0.00073	0.00075	0.00002	0.00020	0.00022	2.40229	0.00012	0.00033	2.50547
Hauling	0.00017	0.00003	0.00220	0.00094	0.00001	0.00002	0.00048	0.00050	0.00002	0.00013	0.00016	1.61573	0.00012	0.00026	1.69788

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	1/4/2027	1/29/2027	5.00000	20.0000	—
Grading	Grading	1/30/2027	3/31/2027	5.00000	43.0000	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Tractors/Loaders/ Backhoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000
Grading	Rubber Tired Dozers	Diesel	Average	1.000000	6.00000	367.000	0.40000
Grading	Tractors/Loaders/ Backhoes	Diesel	Average	2.00000	7.00000	84.0000	0.37000

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	Worker	10.00000	18.5000	LDA,LDT1,LDT2
Site Preparation	Vendor	0.00000	10.2000	HHDT,MHDT
Site Preparation	Hauling	0.00000	20.0000	HHDT
Site Preparation	Onsite truck	2.00000	0.50000	HHDT

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Grading	Worker	16.0000	18.5000	LDA,LDT1,LDT2
Grading	Vendor	4.00000	10.2000	HHDT,MHDT
Grading	Hauling	1.23256	20.0000	HHDT
Grading	Onsite truck	2.00000	0.50000	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Grading	210.000	210.000	0.00000	0.00000	0.00000

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2027	0.00000	531.983	0.03300	0.00400

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	8.74000	annual days of extreme heat
Extreme Precipitation	3.50000	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00000	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction

measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	37.5731
AQ-PM	55.3703
AQ-DPM	30.8276
Drinking Water	36.1684
Lead Risk Housing	25.5829
Pesticides	0.00000
Toxic Releases	84.9462
Traffic	51.3125
Effect Indicators	—
CleanUp Sites	74.9347
Groundwater	14.3118
Haz Waste Facilities/Generators	35.6188

Indicator	Result for Project Census Tract
Impaired Water Bodies	23.8765
Solid Waste	89.3471
Sensitive Population	—
Asthma	22.8814
Cardio-vascular	30.5334
Low Birth Weights	23.9158
Socioeconomic Factor Indicators	—
Education	40.0658
Housing	34.2459
Linguistic	15.6449
Poverty	25.2513
Unemployment	53.8912

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	93.14769665
Employed	58.62953933
Median HI	75.32400873
Education	—

Indicator	Result for Project Census Tract
Bachelor's or higher	64.96856153
High school enrollment	100
Preschool enrollment	39.48415244
Transportation	—
Auto Access	83.51084306
Active commuting	23.08481971
Social	—
2-parent households	73.87398948
Voting	38.00846914
Neighborhood	—
Alcohol availability	37.20005133
Park access	45.96432696
Retail density	23.27730014
Supermarket access	65.72565123
Tree canopy	19.87681252
Housing	—
Homeownership	70.64031823
Housing habitability	80.95726934
Low-inc homeowner severe housing cost burden	80.803285
Low-inc renter severe housing cost burden	69.40844347
Uncrowded housing	68.66418581

Indicator	Result for Project Census Tract
Health Outcomes	—
Insured adults	91.7875016
Arthritis	63.4
Asthma ER Admissions	86.6
High Blood Pressure	81.4
Cancer (excluding skin)	29.3
Asthma	58.2
Coronary Heart Disease	74.7
Chronic Obstructive Pulmonary Disease	68.2
Diagnosed Diabetes	90.6
Life Expectancy at Birth	36.8
Cognitively Disabled	74.6
Physically Disabled	73.0
Heart Attack ER Admissions	89.6
Mental Health Not Good	68.6
Chronic Kidney Disease	85.5
Obesity	80.7
Pedestrian Injuries	95.6
Physical Health Not Good	82.3
Stroke	84.7
Health Risk Behaviors	—

Indicator	Result for Project Census Tract
Binge Drinking	2.1
Current Smoker	61.3
No Leisure Time for Physical Activity	85.5
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	3.5
Children	91.6
Elderly	56.5
English Speaking	98.1
Foreign-born	7.8
Outdoor Workers	48.6
Climate Change Adaptive Capacity	—
Impervious Surface Cover	14.4
Traffic Density	34.4
Traffic Access	64.5
Other Indices	—
Hardship	5.2
Other Decision Support	—
2016 Voting	74.5

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	28.0000
Healthy Places Index Score for Project Location (b)	74.0000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Land Use	Site is an energy generation facility with accompanying system structures versus buildings.

Screen	Justification
Construction: Construction Phases	2-3 months of construction. Site preparation and grading (predominantly excavation and restoring excavated areas back to grade) are the only expected phases for this project.
Construction: Off-Road Equipment	Project effort requires minimal equipment usage.
Construction: Dust From Material Movement	The "Total Acres Graded" was reduced to zero because the entire site is graded.
Construction: Trips and VMT	Increased site preparation worker one way trips from 2.5 to 10 one-way trips which is equivalent to 5 workers/round trips. Increased grading phase worker one way trips from 5 to 16 (or 8 workers/roundtrips). Added an onsite truck to the site preparation phase: 2 one-way trips or 1 roundtrip. For the grading phase, 2 round trips were added for the vendor trips, one of which is to represent a concrete truck which will be utilized for pipeline foundation work.
Construction: On-Road Fugitive Dust	Changed "% Pave Onsite Truck" from 0% to 100% because all roads are paved.

8.3. Land Use

Model Parameter	Units	Default Value	New Value
Lot Area	acre	0.00000	0.55000
Landscape Area	sq. ft	—	0.00000
Special Landscape Area	sq. ft	—	0.00000

8.4. Construction

8.4.1. Construction Phases

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Site Preparation	Site Preparation	Start Date	1/19/2027	1/4/2027
Site Preparation	Site Preparation	End Date	1/20/2027	1/29/2027
Site Preparation	Site Preparation	Work Days per Phase	1.000000	20.0000

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Grading	Grading	Start Date	1/21/2027	1/30/2027
Grading	Grading	End Date	1/23/2027	3/31/2027
Grading	Grading	Work Days per Phase	2.00000	43.0000

8.4.2. Off-Road Equipment

Phase Name	Equipment Type	Model Parameter	Default Value	New Value
Grading	Tractors/Loaders/Backhoes	Number per Day	1.000000	2.00000

8.4.4. Dust from Material Movement

Phase Name	Model Parameter	Units	Default Value	New Value
Grading	Material Imported	Cubic Yards	—	210.000
Grading	Material Exported	Cubic Yards	—	210.000
Grading	Total Acres Graded	acres	16.1250	0.00000

8.4.6. Trips and VMT

Phase Name	Trip Type	Model Parameter	Default Value	New Value
Site Preparation	Worker	One-Way Trips per Day	2.50000	10.00000
Grading	Worker	One-Way Trips per Day	7.50000	16.0000

8.4.7. On-Road Fugitive Dust

Phase Name	Model Parameter	Units	Default Value	New Value
Site Preparation	Onsite Truck Trip Paved	%	0.00000	100.0000
Grading	Onsite Truck Trip Paved	%	0.00000	100.0000