DOCKETED	
Docket Number:	01-EP-10C
Project Title:	Enterprise Emergency Peaker Project - Compliance
TN #:	262237
Document Title:	Supplemental Petition for Post-Certification Amendment, Figure 1, Figure 2, Exhibit 1, and Appendices A through C
Description:	Provides the Applicant's Supplemental Petition submittal for Post-Certification Amendment. Preliminary draft submittal includes an introduction, description of proposed changes, necessity of proposed change, new information or change in circumstances that necessitated the change, analysis of the effects that the proposed change will have on the environment and mitigation measures proposed, modifications impacts on LORS compliance, potential effects on public, property owners, modifications impact on the public and nearby property owners, applicable CEQA exemptions, and conclusions. In addition, this submittal includes a regional location map (Figure 1), Site Layout (Figure 2), photo simulations of Enterprise BESS Project (Exhibit 1), Analysis of the Potential Effects of the Proposed Modification and Proposed Avoidance and Mitigation Measures provided as Appendix A, Enterprise BESS Only Conditions of Certification provided as Appendix B, and the Air Quality and Greenhouse Gas Study provided as Appendix C.
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Supplemental Petition for Post-Certification Amendment
CalPeak Power-Enterprise, LLC
Enterprise Emergency Peaker Project (01-EP-10C)

52-Megawatt
Battery Energy Storage System Project

Enterprise BESS LLC

March 2025

201 Enterprise Street
2361 Auto Park Way
Escondido, CA 92029

Table of Contents

Table of Contents

SECTION **PAGE**

1.0 INTRODUCTION

Pursuant to Title 20, California Code of Regulations (CCR), Section 1769(a)(1), CalPeak Power-Enterprise, LLC (CalPeak) hereby files this supplemental petition for amendment of the certification of the Enterprise Emergency Peaker Plant (EEPP; Docket No. 01-EP-10C) on behalf of and for the benefit of Enterprise BESS LLC (this "Supplemental Petition"). The EEPP is owned and operated by CalPeak. Enterprise BESS LLC proposes to construct and operate a nominal 52-megawatt (MW) battery energy storage system Project (hereinafter, Enterprise BESS Project). The proposed Enterprise BESS Project is located on the site of the existing nominal 49.4 MW EEPP and on three adjacent parcels to the north all of which are located in the City of Escondido in San Diego County, California (see Figure 1, Regional Location Map and Figure 2, Site Layout).

CalPeak originally filed a petition for amendment of the EEPP certification for the Enterprise BESS Project in March 2024 (CEC Docket No. 01-EP-10C, as amended; TN 255290 as docketed on March 26, 2024). Enterprise BESS LLC proposes to construct and operate a nominal one-hour, 52-MW battery energy storage system project in a coordinated manner with the EEPP. In addition to the co-located and shared facilities, the operational outputs of the EEPP and the BESS will be coordinated to not exceed the California Independent System Operator (CAISO) Aggregate Capability Constraint of 52 MW at the common point of interconnect (POI). As presented in the March 2024 Petition, the proposed Enterprise BESS Project was to be located primarily on the southern portion of the site of the existing nominal 52 MW EEPP. Installation of the BESS project as previously proposed on the southern portion of the EEPP parcel would have required substantial cut and fill to remove the hillside that abuts the San Diego Gas & Electric Company (SDG&E) Palomar property to the south. The limited site area and required vertical slope cuts to remove the hillside at the southern EEPP property line present engineering and environmental obstacles to development.

Upon further engineering review and adjacent landowner consultations, it was determined that the potential impacts associated with the cut and fill to remove the hillside could be avoided, and thus the Enterprise BESS Project can be more readily constructed, if the modular battery and inverters are installed on the adjacent property(s) to the north along the south side of Auto Park Way which is currently occupied by existing industrial/commercial businesses on Assessor Parcel Numbers (APNs) 232-410-19, 232-410-20, and 232-410-00. The total acreage of these three parcels is approximately 0.82 acre. The parcels are all zoned M-1, Light Industrial and the Land

Use is designated as L-1, Light Industrial.[1]

The interconnection for the Enterprise BESS Project is unchanged by this Supplemental Petition. The Enterprise BESS electrical interconnection to the grid will be on the EEPP site using the low side of the existing EEPP generation step-up (GSU) transformer in the EPPP switchyard. This interconnection is central to the Enterprise BESS as it will allow for the BESS and EEPP to be operated in a coordinated manner. The high side of the existing GSU at the EEPP is connected to an existing 69 kilovolt (kV) line that connects to an SDG&E substation located approximately 0.5 mile to the north of the EEPP.

The EEPP and the Enterprise BESS would share co-located, common facilities and would be operated in a coordinated manner. The operational outputs of the EEPP and the BESS will be coordinated to not exceed the CAISO Aggregate Capability Constraint of 52 MW at the common POI.

The EEPP and Enterprise BESS Project will share the following common facilities: GSU, switchyard, gen-tie, and a common PO) with the CAISO controlled/SDG&E owned transmission system. The EEPP and the Enterprise BESS Project will each have their own metering equipment and CAISO Resource ID numbers. In addition to the co-located and shared facilities, the operational outputs of the EEPP and the BESS will be coordinated to not exceed the CAISO Aggregate Capability Constraint of 52 MW at the common POI.

CalPeak specifically seeks the following amendments.

First, CalPeak requests an amendment to the certification for the EEPP to allow for interconnection of the proposed Enterprise BESS Project. The amendment is a change to the project description that includes the interconnection of the BESS at the low side of the existing GSU transformer at the EEPP and the use of the common facilities. CalPeak will remain responsible for operation and compliance with the Commission Conditions and applicable laws, ordinances, regulations, and standards (LORS) for the EEPP.

[1] On October 9, 2024, the Escondido City Council voted to approve an Interim Ordinance prohibiting the City from issuing any use permit, variance, building permit, business license, or any other entitlement for use shall be approved or issued for the establishment, construction, or operation of a commercial BESS facility for any location or property within the City of Escondido. On October 20, 2024, the City of Escondido extended their current moratorium on the issuance of any City entitlements for use for new battery energy storage systems through the close of business on October 5, 2025. (Escondido Ordinance No. 2024-14R.) At the end of the moratorium, there is no statutory requirement that the local government act, or refuse to act, in any specified manner. Consequently, it is important to note that the moratorium itself is not a substantive local land use ordinance; it is a statutory process which may or may not result in a later enactment. Moreover, as a matter of law, the Commission's exclusive jurisdiction pursuant to Public Resources Code Section 25500 et seq. cannot be preempted by local ordinance, and the Commission retains all of its legal authorities under the Public Resources Code.

Second, CalPeak on behalf of Enterprise BESS LLC requests an amendment to the EEPP certification identifying Enterprise BESS LLC as the party that will have legal responsibility for the operation, compliance with any associated Commission Conditions of Certification, and compliance with applicable LORS for the Enterprise BESS Project. A list of proposed BESS-only Conditions of Certification resulting from this request is attached hereto as Appendix B.

The requested modifications will allow for the Enterprise BESS Project to be constructed and operated in coordination with the EEPP. The Enterprise BESS Project will be constructed in part to support California's current need for additional electrical energy storage available for dispatch during peak load demand time periods in the summer and would advance the State's and the California Public Utility Commission's (CPUC's) policy of 60% renewable power by 2030 and 100% by 2045 (Senate Bill 100). The Enterprise BESS Project offers the CAISO a reliable dispatchable energy resource to the electrical grid.

The proposed Enterprise BESS Project will not result in an increase in the EEPP's hourly or annual air emissions above currently permitted limits. The environmental impact assessment presented in Section 5 and Appendices C through G hereto concludes that with the implementation of the Conditions set forth herein, no potentially significant environmental impacts are associated with the implementation of the actions specified in this Supplemental Petition for Post-Certification Amendment, and that the Project, as specified herein, will remain in compliance with all applicable LORS.

Key California Energy Commission (CEC) licensing related documents for the EEPP include:

- Application for Certification (AFC) Pursuant to 21-Day Emergency Permitting Process, CalPeak Enterprise #7, CalPeak Power, LLC, May 7, 2001
- CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit, June 1, 2001
- CalPeak Enterprise #7 Escondido (01-EP-10), AFC Final Decision, June 6, 2001

Key CEC licensing related documents docketed to date specifically for the Enterprise BESS Project include:

- Petition for Post-Certification Amendment – Part 1 (through Appendix A), Docket date and number: 3/26/2024, TN 255290 (supersedes TN 255070-1 dated 3/14/24)
- Petition for Post-Certification Amendment – Part 2 (Appendices B through G), Docket date and number: 3/14/2024, TN 255070-2
- Application for Confidential Designation for PTA Cultural Resources Appendix, Docket date and number: 3/14/2024, TN 255072
- CEC's Response Letter to CalPeak Power-Enterprise, LLC's Application for Confidential Designation dated 3-14-24, Docket date and number: 4/24/2024, TN 255903

- This Supplemental Petition for Post-Certification.

The BESS-specific documents listed above are being amended in association with this Supplemental Petition. In addition, a new Appendix H, Fire Safety, is provided with this Supplemental Petition.[2]

1.1 Background

The EEPP and Enterprise BESS Project electrical interconnection facilities will be co-located on the same CEC-jurisdictional site. Specifically, the entire Assessor Parcel No. 232-410-45-00 where the EEPP is located is owned by CalPeak. The proposed Enterprise BESS interconnection facilities would utilize approximately 0.03 acre of available open space within the overall 2.94-acre EEPP parcel. In addition, approximately 0.82 acre of additional land on the adjacent parcels to north of the EEPP parcel would be utilized for the modular BESS related facilities. The CEC has determined that the portion of the Enterprise BESS Project on the adjacent parcels to the north of the EEPP are CEC jurisdictional.

A lease, easement or other agreement between Enterprise BESS LLC and CalPeak will be entered into for the use of the co-located, shared facilities on the EEPP property. The proposed Enterprise BESS Project includes leased land adjacent to and north of the EEPP parcel for the modular BESS related facilities on the south side of Auto Park Way. The portion of the Enterprise BESS Project development area on the EEPP site is located within Assessor Parcel No. 232-410-45-00, which is zoned M-1, Light Industrial. The adjacent properties on APNs 232-410-19, 232-410-20, and 232-410-00 to the north that will be utilized for BESS development are also zoned M-1, Light Industrial. The combined site area is bordered to the north by Auto Park Way, to the east and southeast by multiple commercial buildings, to the south by the SDG&E Palomar Energy Center and to the west by vacant, undeveloped land owned by SDG&E, beyond which is Citracado Parkway.

The proposed BESS interconnection facilities site area on the EEPP site has been previously disturbed with historical agricultural use, and development of the EEPP in the early 2000s. Given the limited area available for BESS development on the EEPP site, BESS development will occur primarily on the adjacent parcels to the north at 2361 Auto Park Way which has been occupied by auto paint and body related businesses for at least the last 30 years. According to historical resources reviewed, the northern project area was vacant, undeveloped land from at least the

[2] Several other previous Petitions to Amend the CEC License for the EEPP have been filed by the applicant related to changes in ownership and operation. The most recent EEPP specific Petition posted on the CEC's website at the time this Petition was prepared is from 2019 and pertains to changing operational control back to CalPeak Power-Enterprise, LLC from NAES and changing the name of the facility to Enterprise Emergency Peaker Project. The CEC approved the petition request on July 29, 2019.

late-1930s through at least 1970 (AECOM 2024). Development of the northern parcels area will require demolition and removal of the existing buildings on the site. In addition, limited site topography modification on the southern portion of the northern parcel area will be required to accommodate the modular BESS related facilities. The Project may require removal of up to five of the coniferous trees that were installed by the EEPP along the northern EEPP site perimeter as part of the EEPP landscape plan which provides visual screening for the EEPP. The proposed design includes an engineered retaining wall to be installed near the southern boundary of the northern BESS site area . The Enterprise BESS Project will mitigate project impacts in accordance with CEC and other regulatory requirements, as applicable.

The Project will utilize containerized battery systems with internal heating ventilation and air conditioning and internal fire detection and fire suppression systems in each container, battery management systems, power conversion systems (also called inverters), transformers, and electrical conductors. In addition, the proposed BESS development on the northern parcels area includes a 20-foot-wide, bidirectional double swing gate at the northwest entrance at Auto Park Way and 20-foot-wide internal access roads. The Project also includes an approximately 350-foot-long above ground 13.8 kilovolt (kV) gen-tie line installed on an elevated cable tray assembly to connect the BESS to the existing EEPP switchyard GSU transformer. Associated electrical interconnection facilities to be installed on the EEPP site include an elevated steel platform with switchgear and metering equipment as well as additional cable tray connections from the switchgear to the low side of the existing GSU at the EEPP and communication line connections.

The Enterprise BESS Project will connect to the grid through the low side of the existing 13.8 kV/69 kV GSU at the EEPP. The high side of the existing GSU at the EEPP is connected to an existing 69 kV line that connects to an SDG&E substation located approximately 0.5 mile to the north of the EEPP.

The EEPP and the Enterprise BESS Project will each have their own metering equipment and CAISO Resource ID numbers. In addition to the co-located and shared facilities, the operational outputs of the EEPP and the BESS will be coordinated to not exceed the CAISO Aggregate Capability Constraint of 52 MW at the common POI. The Enterprise BESS Project would be charged exclusively from the grid, particularly when excess renewable energy is available, storing this energy for peak periods when renewable energy is less available, resulting in lower total greenhouse gas emissions. Furthermore, dispatches from the Enterprise BESS Project would replace energy that would otherwise be generated by the adjacent gas-fired EEPP.

The battery system will be controlled by an Energy Management System (EMS) controller, which will be connected to the existing Power Plant Control (PPC) system at the EEPP. The direct current block EMS will ramp up and down as directed by the EEPP PPC to not exceed 52 MW at the common POI. The PPC active power control at the EEPP consists of power curtailment, ramp rate control, frequency control, power limit control and plant start and shutdown. The PPC controls

active power injection at the common POI such that EEPP never exceeds the maximum MW at the common interconnection. The power curtailment feature of the PPC maintains active power at common POI below the curtailment setpoint. The EEPP and BESS would operate simultaneously during ramp up and ramp down between BESS and EEPP operation, but the combined output would never exceed 52 MW at the common POI.

The proposed BESS facility would consist primarily of modular battery storage system enclosures and inverters installed on concrete pad foundations. Battery technologies being considered are lithium iron phosphate (LFP) or other technologies that may be available as the Enterprise BESS Project undergoes final design. Batteries would be installed in enclosures that are electrically connected together to reach the desired output of BESS. The medium voltage transformers and inverters would be located adjacent to the enclosures they serve. Approximate dimensions for the battery enclosures vary but are typically in the range of approximately 8 feet wide by 20 feet long by 9.5 feet high. Technology selection post-Certification will emphasize safe and reliable system design and will not affect the BESS's potential impacts or footprint, given that all technologies are enclosed, housed systems. The BESS systems will be certified to UL 9540 safety and all applicable standards for BESS enclosures.

Battery output degrades over time requiring replacement and/or additional battery bank modules ("augmentation"). Allowance for this work and the physical enclosures required will be made during construction of the BESS, all within the Project parcels and the environmental impacts analyses of this Supplemental Petition.

1.2 20 CCR Section 1769 Information Requirements

The following sections contain the information required pursuant to Title 20, CCR, Section 1769(a)(1).

2.0 DESCRIPTION OF PROPOSED CHANGES

This section addresses the requirements of Title 20, CCR, Section 1769(a)(1)(A).

2.1 Enterprise BESS Project Overview: Description of the Proposed Modification

The proposed Enterprise BESS Project includes electrical interconnection components on the northern portion of the existing EEPP property and BESS component related facilities on the three adjacent parcels to the north. Brief descriptions of the EEPP property and the northern parcel areas follows.

2.1.1 Existing EEPP Facility Overview

The proposed Enterprise BESS Project includes interconnection facilities in the northern portion of the existing switchgear area on the EEPP site as shown on Figure 2. The proposed Enterprise BESS Project will not involve modifications to the power block area at the EEPP. The EEPP is a nominal 49.5 MW simple-cycle, natural gas-fired peaking power plant located on approximately 2.94 acres of land owned by CalPeak. Key features of the EEPP include one office trailer, two combustion turbines, which are connected to a single generator, and associated primary and secondary control houses. Ancillary structures include natural gas intake and compression areas, a selective catalytic reduction system for controlling nitrogen oxide (NOx) emissions, primary and auxiliary oil-filled electrical power transformers, and various aboveground storage tanks (ASTs) containing aqueous ammonia, water, wastewater, and diesel. In addition, there is a gas metering station located on the southwestern portion of the site. An in-ground oil/water separator (OWS) is located in the north-central portion of the EEPP property, east of the switchyard and west of the water ASTs. An in-ground drainage system utilizing floor drains within the turbine and generator enclosures routes equipment wash water and incidental leaks from collection pans to an in-ground collection sump, from which it is pumped to a wastewater AST. Additionally, stormwater that collects in the in-ground containment for the aqueous ammonia AST, the transformer containment areas, and the cable trays is routed to an in-ground OWS prior to discharge to the drainage area located on the northwest side of the plant.

The stormwater runoff from the EEPP switchgear area where the proposed Enterprise BESS Project interconnection facilities are planned will be routed via gravity flow for integration with the existing stormwater collection and discharge system at the EEPP. The portion of the proposed Enterprise BESS Project on the EEPP is not expected to add new impervious areas or to increase runoff on the site. Several foundations for the gen-tie cable tray to be installed over the hill on the northern portion of the EEPP site could add up to an estimated 75 to 100 square feet of impervious concrete which would not measurably impact stormwater flows on the developed portion of the EEPP site.

The remainder of the subject EEPP property consists of a paved and/or gravel driveway and vegetation around the majority of the site perimeter. Mature coniferous trees planted as part of the CEC and City of Escondido approved landscape plan associated with the permit approvals for the EEPP in 2001 are present around the northern, western, and northeastern EEPP site perimeters. The proposed Enterprise BESS Project does not involve development on the southern half of the EEPP parcel.

2.1.2 Northern Parcels Area

The portion of the Enterprise BESS Project development area to the north of the EEPP is located on the following three adjacent properties, for which the Applicant has site control: APNs 232-

410-19, 232-410-20, and 232-410-00. These three parcels encompass approximately 0.82 acre and are all zoned M-1, Light Industrial. All three parcels are bordered to the north by Auto Park Way. The northern parcel area has been used for auto paint and body related businesses for at least the last 30 years (AECOM 2024), and there are several one story buildings and sheds on the parcels. The easternmost parcel abuts another offsite commercial building that will not be developed as part of the proposed BESS project. The southern portion of the parcels area has an existing sloped area that abuts the northern property boundary for the EEPP. The northern parcel area has existing ornamental landscaping along the frontage south of Auto Park Way.

2.1.3 Planned Modifications

The key components of the proposed Enterprise BESS Project are listed below.

- Batteries with up to a nominal 52 MW hours (MWh) of energy production capability to be located within the approximately 0.82-acre northern parcels area. The battery storage technologies being considered are LFP or other appropriate technologies that may become commercially available as the BESS project undergoes final design.
- The BESS components on the northern parcels area, including batteries, inverters, augmentation, site access roadways, and northern portion of the aboveground 13.8 kV cable tray route are shown on the Preliminary Site Layout (see Figure 2).
- The BESS electrical interconnection at the low side of the existing GSU at the EEPP switchgear area will involve installation of an aboveground cable tray on portions of the EEPP site to support the 13.8 kV gen-tie and communication lines between the BESS facilities on the northern parcels area and the switchgear/GSU area at the EEPP. The proposed interconnection facilities to be constructed include an elevated switchgear/metering platform on the northern portion of the existing EEPP. The electrical interconnection facilities on the northern portion of the EEPP site will encompass less than 0.1 acre of previously disturbed areas.
- The elevated gen-tie cable tray to be installed for support of the 13.8 kV gen-tie and communication lines between the BESS facilities on the northern parcels area and the GSU at the EEPP to the south will be constructed over the hill on the northern portion of the EEPP site and will be routed and designed to avoid and/or minimize impacts to the existing landscaping trees (mature Canary pines) in the route vicinity. It is estimated that up to five trees may need to be removed associated with installation of the gen-tie cable tray.
- Site development for the BESS facilities will require demolition of structures on the northern parcels area associated with the existing auto paint and body repair business, site grading and excavation of soil and rock and re-compaction to accomplish site stormwater control and to support equipment foundations.

- In order to create the needed level space to install the proposed BESS facilities, a portion of the sloping hillside on the southern portion of the northern parcels site area will need to be cut and levelled to near the southern property line requiring installation of an up to approximately 18-foot-tall retaining wall.
- The BESS project will utilize the limited available open areas with the overall EEPP property and the northern parcels area for temporary construction laydown as well as offsite laydown on a previously disturbed site to be identified.
- The Enterprise BESS Project will be connected to an existing SDG&E Substation to the north via installation of an onsite 13.8 kV cable connection to the existing GSU transformer at the EEPP switchyard which is already connected to the SDG&E Substation. No offsite transmission construction or upgrades are required for the Project.
- The Enterprise BESS Project, submitted to the CAISO, would transform the existing generating facility by providing battery energy storage capabilities in combination with its existing technology. This will provide the SDG&E system with a new energy storage capability. This Project will be charged from the grid, not from the EEPP.
- This Project has been submitted into CAISO's Post-COD Modification Review Process.
- Construction site mobilization is currently anticipated to begin in the 4th quarter of 2025.

2.2 Construction

Construction of the Enterprise BESS Project will occur over an approximately 10-month period. Construction site mobilization is currently anticipated to begin in the 4th quarter of 2025. Construction hours are expected to typically start at 7 a.m. and end at 7 p.m., Monday through Saturday. Typical worker hours and equipment usage will be 8 hours/day within the 7 a.m. to 7 p.m. window.

The construction phase will be followed by approximately 2 months of commissioning and testing with commercial operation planned to start in the fourth quarter of 2026.

The primary construction activities are planned as follows:

- Demolition and removal of the existing buildings and structures on the northern parcels area.
- Site grading of the northern parcels area including removal and flattening of the southern slope area to create more space for placement of BESS facilities. Removal of the existing cut slope area will include the need for an up to 18-foot-tall vertical wall near the southern property line.
- Site preparation and installation of stormwater drainage and control facilities on the northern parcels area.

- Install BESS equipment foundations on the northern parcels area.
- Set battery modules and inverters.
- Install foundations and structures at common POI (i.e., elevated switchgear platform and cable trays in peaker plant switchyard area).
- Install gen-tie elevated cable tray between BESS switchgear on the northern parcels area and the EEPP switchyard area.
- Complete electrical/wire connections.
- Mechanical completion.

Key project details for the Enterprise BESS Project are summarized in Table 1.

Table 1
52 MW Enterprise BESS Project Details

Item	Enterprise BESS 52 MW	Comments
BESS Facilities on Northern Parcels (south of Auto Park Way)	0.82 acre	Demolition of existing auto body shop facilities; grading and excavation for site levelling, retaining wall installation, drainage control, foundations; installation of modular BESS and PCS facilities, transformers, and electrical connections; installation of internal access roads and gates; and installation of the northern end of elevated gen-tie cable tray and connection to the BESS switchgear on the northern parcel area.
BESS Interconnection Facilities on Northern Portion of EEPP Site	<0.1 acre	Installation of gen-tie cable tray from northern parcel boundary to the EEPP northern switchgear area; elevated switchgear platform, interconnection on low side of EEPP GSU, and communication lines.
Total Project Disturbance Footprint: Permanent Temporary	 0.85 acre 0.97 acre	 0.82 acre on northern parcel area and 0.03 acre on northern portion of EEPP site Temporary includes permanent facilities footprint plus additional temporary construction disturbance (0.12 acre on the northern portion of the EEPP site)
Construction Peak Workforce	50	
Construction Truck Trips	Peak 35/day for the first 5.5 months	Truck trips will include incoming equipment, material, and water deliveries as well as export of demolition material and excess cut spoil material from removal of the southern hillside. Concrete, asphalt and gravel suppliers are located within a less than 5-mile road distance from the Enterprise BESS site.

Item	Enterprise BESS 52 MW	Comments
	Peak 5/day for additional 6-8 months	Truck trips will include incoming equipment, material, and water deliveries.
Demolition of Existing Auto Body Business Improvements on Northern Parcels Area	Approximately 1.5 months to remove existing facilities	Estimated approximately 1,620 cubic yards of demolition material including buildings, pavement, buried utilities, and foundations.
Earthwork/Cut and Fill required for BESS Site Levelling	Site grading and excavation	Site preparation will include grading and excavation required to remove the cut slope along the southern property boundary of the northern parcels area to create a level BESS development area including installation of an up to 18-foot-tall wall with soldier pile foundation. Earthwork estimated at up to approximately 3,290 cubic yards of cut and 2,664 cubic yards of export for native soil and rock pending final design. As indicated, the majority of cut/excavated material to be hauled and disposed of offsite.
Foundation Type	Concrete pad for main BESS area facilities	Assumed that a concrete pad foundation will be used for the main BESS facility area on the northern parcels area pending final design. The 13.8 kV power cable is planned to be installed aboveground in a cable tray between the BESS area on the northern parcels to the GSU at the EEPP switchyard area. The project includes installation of an elevated steel platform for switchgear and metering and associated communication lines in the northern portion of the EEPP site. Foundations are expected to be shallow drilled pier and concrete pads.
Imported Site Preparation Materials	Various	Estimated approximately 1,050 cubic yards of imported base materials including riprap, yard stone, asphalt, concrete, and soldier piles.
Construction Water Usage/Day	5,000 gal/day	Short-term construction water needs met by the existing EEPP and northern parcels City water supply and/or construction contractor trucking to the site. Water for dust control and other construction needs is estimated at up to 5,000 gallons per day during demolition and site grading and leveling activities and to average 2,000 – 3,000 gallons per day for the balance of construction activities involving ground disturbance and other dust generating activities.
Construction Equipment	Various	During construction, a variety of equipment and vehicles would operate on the BESS project site areas. Construction equipment to be utilized would be expected to include motor graders, backhoes, pile drivers, excavators, rock hammers, water trucks, sheep's foot compactors, front end loaders, concrete trucks, dump trucks, trash trucks, flatbed trailers, and a portable electric generator. Cranes, rough terrain forklifts, man-lifts, portable welding units, line trucks, and mechanic trucks will

Item	Enterprise BESS 52 MW	Comments
		also be required. All equipment and vehicles would comply with applicable noise requirements. In addition, the BESS project will utilize construction equipment with Tier 4, California Air Resources Board-certified off-road diesel engines and diesel particulate filters, as applicable.
Construction Hours	7 am – 7 pm	Construction activity noise will be limited to the hours of 7 a.m. to 7 p.m. so as not to be disturbing, excessive or offensive before 7 a.m. or after 7 p.m.
Tentatively Planned Construction Schedule	Start Date 4th Quarter 2025	Construction activities involving ground disturbance will occur over an estimated 6-month period, including: demolition and site preparation in Months 1-4; retaining wall and install foundations and equipment in Months 4-7; set modules, inverters and switchgear in Months 7-9; and install electric wire and finish grading in Months 9-11. Commissioning tentatively planned for Months 11-14.
Planned Commercial Operation Date	4th Quarter of 2026	Subject to supply procurement and market conditions, among other factors.
Maintenance Workforce	2 workers, 2 days per week on average	
Noise Levels (Ops)		Packaged inverters and accompanying medium voltage transformers may be supplied by Power Electronics or other manufacturers capable of providing equipment of similar design and capacity. Manufacturer's specifications indicate that these units generate a noise level of between 75 and 79 dBA at 1 meter. BESS battery enclosures would be provided as self-contained packaged units manufactured by CATL or other Tier 1 battery manufacturers. Battery manufacturer's specifications indicate that these units generate a noise level of 75 dBA at 1 meter.
Operational Phase Water Supply/Usage	Unmanned facility	Water may be required for Fire Water and for landscaping, as applicable. The Enterprise Peaker and the northern parcels water supply is from the City of Escondido municipal supply. It is expected that the operational phase water needs will be minimal and will be met by using the existing EEPP and northern parcels City water supply, as applicable.
Battery Augmentation	Add modules	The pad foundations for the future module additions may be installed at the time of construction pending final design.
Expected Project Life	30-40 years	

2.3 Operation and Maintenance

Once constructed, the Enterprise BESS Project would be capable of operating seven days per week and 365 days per year. The BESS facilities would be designed to be operated remotely. Periodic inspections and maintenance activities would occur. No permanent onsite BESS staff are anticipated. Security would be maintained through use of the existing EEPP site security fencing and fencing and/or walls to be installed around the applicable perimeter areas of the northern parcels area. A locking security gate will be installed at the new site entrance planned for the northwest corner of the northern parcels site area. A Knox Box or similar equipment will be included for emergency response/fire personnel access. The Enterprise BESS Project interconnection related facilities on the EEPP site would also be protected by the existing security measures at the EEPP.

Operation and maintenance of the Enterprise BESS Project would generate minimal noise, primarily from fans used to cool electrical equipment and transformers. The Enterprise BESS Project facilities will be designed to comply with applicable City of Escondido noise standards. Periodic on-site maintenance is expected to be required following commissioning. Operations and maintenance activities would require several workers performing visual inspections, monitoring BESS performance, executing minor repairs, and responding to needs for BESS adjustment. It is anticipated that battery module augmentation via installation of additional battery enclosures will be required to make up for decreased battery performance over time. The frequency and extent of such augmentations over the life of the Enterprise BESS Project will be determined based on battery performance monitoring. Allowance for augmentation will be made during construction of the BESS, all within the Project parcels and the environmental impacts analyses of this Supplemental Petition. The expected infrequent maintenance activities would generate little traffic during operations. Operations and maintenance vehicles would include light duty trucks (e.g., pickup, flatbed) and other light equipment and hand tools for maintenance. Heavy equipment would not be utilized during normal operations. Large or heavy equipment may be brought to the facility infrequently for equipment repair or battery replacement.

Sanitary disposal needs for operations would be provided through the existing EEPP facilities (porta potties) and porta potties to be installed at the northern parcels area. Other wastes from equipment replacement or other work would be removed from the site at the end of the day, or as needed. As applicable, spent batteries removed from the site would be handled and transported as Universal Waste prior to offsite recycling. Normal operation of the Enterprise BESS Project is not expected to require use of new hazardous materials and/or to generate additional hazardous wastes in reportable quantities.

As applicable over time, combustible vegetation on and around the Enterprise BESS Project boundaries would continue to be actively managed to minimize fire risk. Additionally, the Enterprise BESS Project would comply with all applicable City of Escondido fire standards.

2.4 Decommissioning

The proposed Enterprise BESS Project is currently anticipated to be capable of operating for 30-40 years or more. Once BESS operations are terminated, the facility would be decommissioned in accordance with then-applicable LORS. Many of the parts of the proposed BESS systems are recyclable, including a substantial percentage of the battery and other electrical components. Spent batteries would be managed and transported as Universal Waste prior to offsite recycling at an approved location. Metal, scrap equipment, and parts that do not have free-flowing oil can be sent for salvage. Equipment containing any free-flowing oil such as oil-filled transformers, as applicable, would be managed as waste and would require evaluation. Oil and lubricants removed from equipment would be managed as used oil.

3.0 NECESSITY OF PROPOSED CHANGE

This section addresses the requirements of Title 20, CCR, Section 1769(a)(1)(B).

The requested amendment would allow for the Enterprise BESS Project to be constructed and operated adjacent to the EEPP, relying on shared facilities and the common POI located on the EEPP site. The Enterprise BESS Project will be constructed in part to support California's current need for additional renewable electrical energy supply, especially during peak load demand time periods in the summer and would advance the State's and the CPUC's policy of 60% renewable power by 2030 and 100% by 2045 (Senate Bill 100). The Enterprise BESS Project offers the CAISO a renewable dispatchable energy resource to the electrical grid and responds to the CAISO requirement to provide additional Resource Adequacy capacity and capability to California's existing transmission system.

4.0 NEW INFORMATION OR CHANGE IN CIRCUMSTANCES THAT NECESSITATED THE CHANGE

This section addresses the requirements of Title 20, CCR, Section 1769(a)(1)(C).

The proposed modifications are not based on information that was known during the emergency certification proceeding in 2001. California's current need and goals for additional renewable electrical energy supply were not known in 2001.

5.0 ANALYSIS OF THE EFFECTS THAT THE PROPOSED CHANGE WILL HAVE ON THE ENVIRONMENT AND MITIGATION MEASURES PROPOSED

This section and Appendix A address the requirements of Title 20, CCR, Section 1769(a)(1)(D). Supporting technical study documentation is also presented in Appendices C through G.

The CEC's Final Commission Decision for the EEPP incorporated the CEC Staff Assessment dated June 1, 2001 by reference. The CEC Final Decision is dated June 6, 2001. The EEPP began commercial operation on September 30, 2001. The Commission-approved Enterprise Peaker Project complied with all applicable requirements of federal law, including, but not limited to the federal Clean Air Act, Clean Water Act, and the Endangered Species Act.

The CEC Final Commission Decision for the Enterprise Peaker Project addressed the following environmental topic areas: Air Quality; Biological Resources, Water Supply and Consumption/Wastewater; Soil; Land Use; Hazardous Materials, and Noise. The 2001 CEC Staff Report included Conditions of Certification for Air Quality; Biological Resources; Cultural Resources; Facility Design; Geological Resources; Hazardous Materials Management; Land Use; Noise; Paleontological Resources; Soil and Water Resources; Public Services; Traffic and Transportation; Transmission System Engineering, Safety, and Reliability; Visual; Waste; and Worker and Fire Safety.

An assessment of the effects that the proposed Enterprise BESS Project may have on the environment with consideration of the topics addressed in the Final Commission Decision/Staff Assessment and current regulations is attached hereto as Appendix A. The assessment of potential effects presented in Appendix A (as supported with technical assessments in Appendices C through H) also considers input provided by CEC staff in 2023 and 2024.

As set forth in detail in Appendix A (as supported with technical assessments in Appendices C through H), the Enterprise BESS Project will avoid or minimize potentially significant effects on the environment.

6.0 MODIFICATIONS IMPACT ON LORS COMPLIANCE

CEC Siting Regulations, Title 20, CCR, Section 1769(a)(1)(E) requires "An analysis of how the proposed change would affect the project's compliance with applicable laws, ordinances, regulations, and standards." As discussed in detail in Section 5, approval of the modifications associated with implementation of the Enterprise BESS Project will not impact compliance with applicable LORS.

7.0 POTENTIAL EFFECTS ON PUBLIC

This section discusses the potential effects on the public that may result from the modifications proposed in this Supplemental Petition for Post-Certification Amendment, in accordance with CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(F)).

With implementation of the proposed modifications to the CalPeak Enterprise Emergency Peaker Project facility and property, the Enterprise BESS Project will have no adverse effect on the public. The installation and operation of the BESS facilities will comply with applicable LORS and with applicant-committed mitigation will not result in any potentially significant impacts. Therefore, no adverse effects on the public will occur because of the changes to the CalPeak Enterprise Emergency Peaker Project facility as proposed in this Supplemental Petition for Post-Certification Amendment.

8.0 PROPERTY OWNERS

Section 1769(a)(1)(G) requires 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." Consistent with privacy considerations, a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 1,000 feet of the project site has been previously provided directly to the Compliance Project Manager.

9.0 MODIFICATIONS IMPACT ON THE PUBLIC AND NEARBY PROPERTY OWNERS

This section addresses potential effects of the project changes proposed in this Supplemental Petition for Post-Certification Amendment 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)). The proposed changes will have no significant environmental effects and will be in compliance with applicable LORS. Therefore, the proposed changes will have no impact on nearby property owners, residents, or the public.

10.0 APPLICABLE CEQA EXEMPTIONS

Section 1769(a)(1)(I) requires a discussion of any exemptions from the California Environmental Quality Act (CEQA), commencing with section 21000 of the Public Resources Code, that the project owner believes may apply to approval of the proposed changes.

The CEC's power plant siting process is a certified state regulatory program under the California Environmental Quality Act (Pub. Resources Code, § 21080.5; 14 C.C.R. §§ 15250-15253.) As such,

it is exempt from the procedural elements of CEQA, though it must adhere to the substantive requirements of CEQA. The CEC's detailed certification process is commonly described as "CEQA-equivalent." CEQA defines a "Project" in pertinent part as "…an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." (Pub. Resources Code § 21065.)

In this case, the Enterprise Peaker Project was subject to environmental review in accordance with the CEC's certified regulatory program. The current operations of the Enterprise Emergency Peaker Project are not a new CEQA "Project," but are part of the existing environmental baseline. Once a project is approved, CEQA does not require that it be analyzed anew every time an action is required to implement the project. Where an Environmental Impact Report (EIR), or in this case the CEC's CEQA-equivalent certification, has been prepared for a project, CEQA expressly prohibits agencies from requiring a subsequent or supplemental EIR, except in specified circumstances, e.g., where the project will have more severe impacts as a result of substantial changes to the project or the circumstances under which it is undertaken. (14 CCR § 15162). As discussed herein, the operations of the Enterprise BESS Project with the CalPeak Enterprise Emergency Peaker Project do not trigger any such requirement.

Even assuming that the Enterprise BESS Project was a CEQA "Project," the activities are potentially categorically exempt. First, the modifications are categorically exempt pursuant to Title 14, Section 15301 of the California Code of Regulations as a minor alteration to an existing facility. The Enterprise BESS Project described herein includes activities that constitute a minor modification to the peaker plant operations and property. The BESS development related changes will involve no expansion of the existing use of the Enterprise Emergency Peaker Project for power generation.

Second, CEQA Guidelines section 15303 exempts construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The Enterprise BESS Project system will consist primarily of modular battery enclosures, inverters with MV transformers, and electrical controls and connections.

In addition, the proposed modifications associated with the Enterprise BESS Project are also potentially categorically exempt from CEQA pursuant to Section 15061(b)(3), the "Common Sense Exemption." This exemption provides that "[w]here it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA." (14 CCR § 15061(b)(3).) In this case, there is no possibility that the proposed change may have a significant effect on the environment. The project will not result in an increase in the EEPP's hourly or annual emissions above the existing permitted potential to emit limits and will not require any revisions to its hourly, daily, or annual emissions

or operational limits to accommodate the project. There would be no substantial adverse changes to existing baseline conditions at the EEPP site from the proposed Enterprise BESS Project. Therefore, the proposed modifications are categorically exempt from CEQA pursuant to the "Common Sense Exemption."

11.0 CONCLUSIONS

For the reasons set forth herein, CalPeak Power Enterprise, LLC and Enterprise BESS LLC respectfully request that the CEC approve the requested Enterprise BESS Project modifications to the CalPeak Power-Enterprise, LLC, Enterprise Emergency Peaker Project pursuant to Title 20, California Code of Regulations, Section 1769.

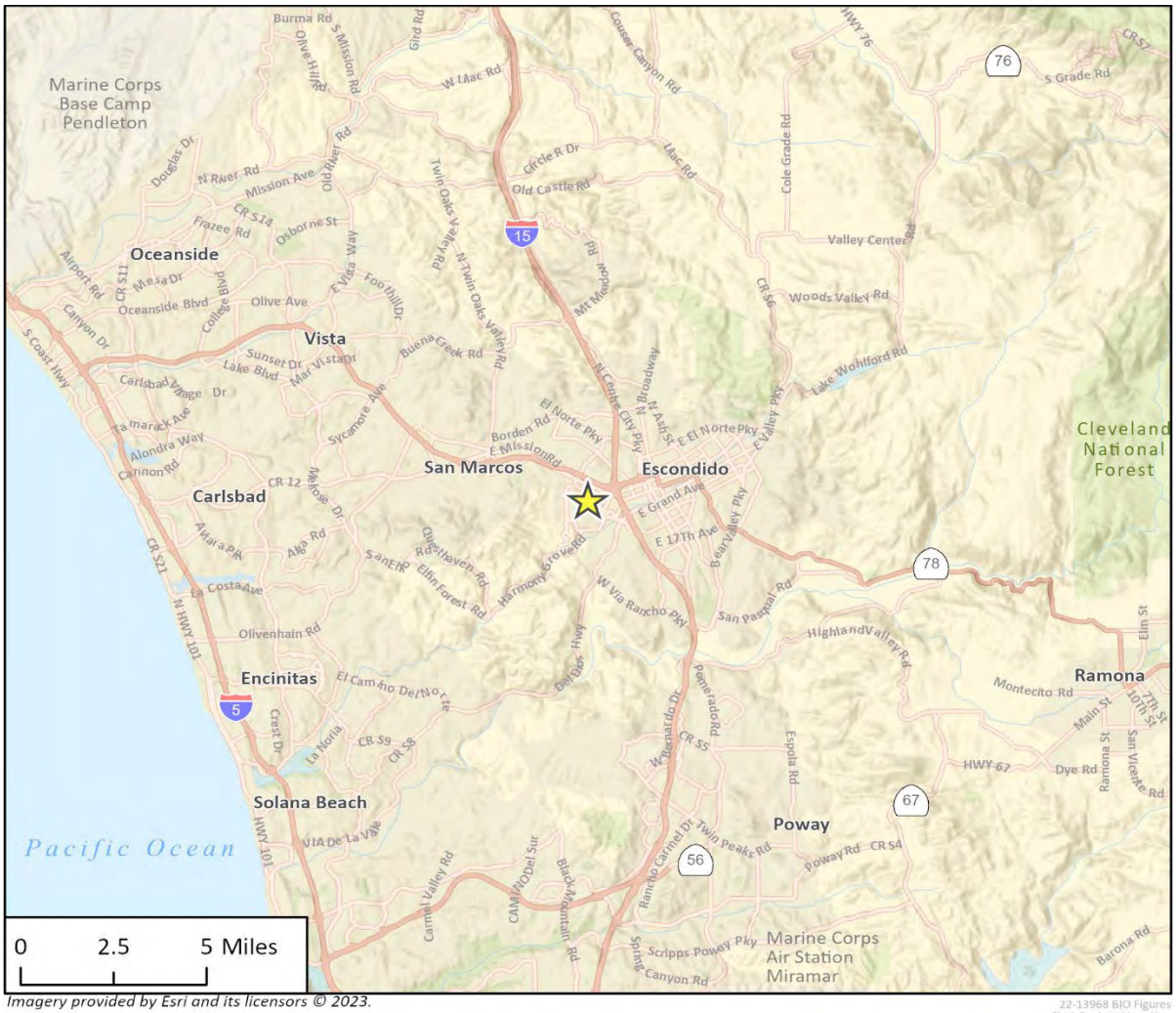
FIGURES

The following figures are attached:

- Figure 1 Regional Location Map
- Figure 2 Site Layout
- Exhibit 1 Photosimulations of Enterprise BESS Project

Figure 1. Regional Location Map

Enterprise BESS Project



Imagery provided by Esri and its licensors © 2023.

22-13968 BIO Figures
Fig 1 Regional Location

Project Location

N

SITE VICINITY MAP (ENLARGED)

SCALE: 1" = 40' - 0"

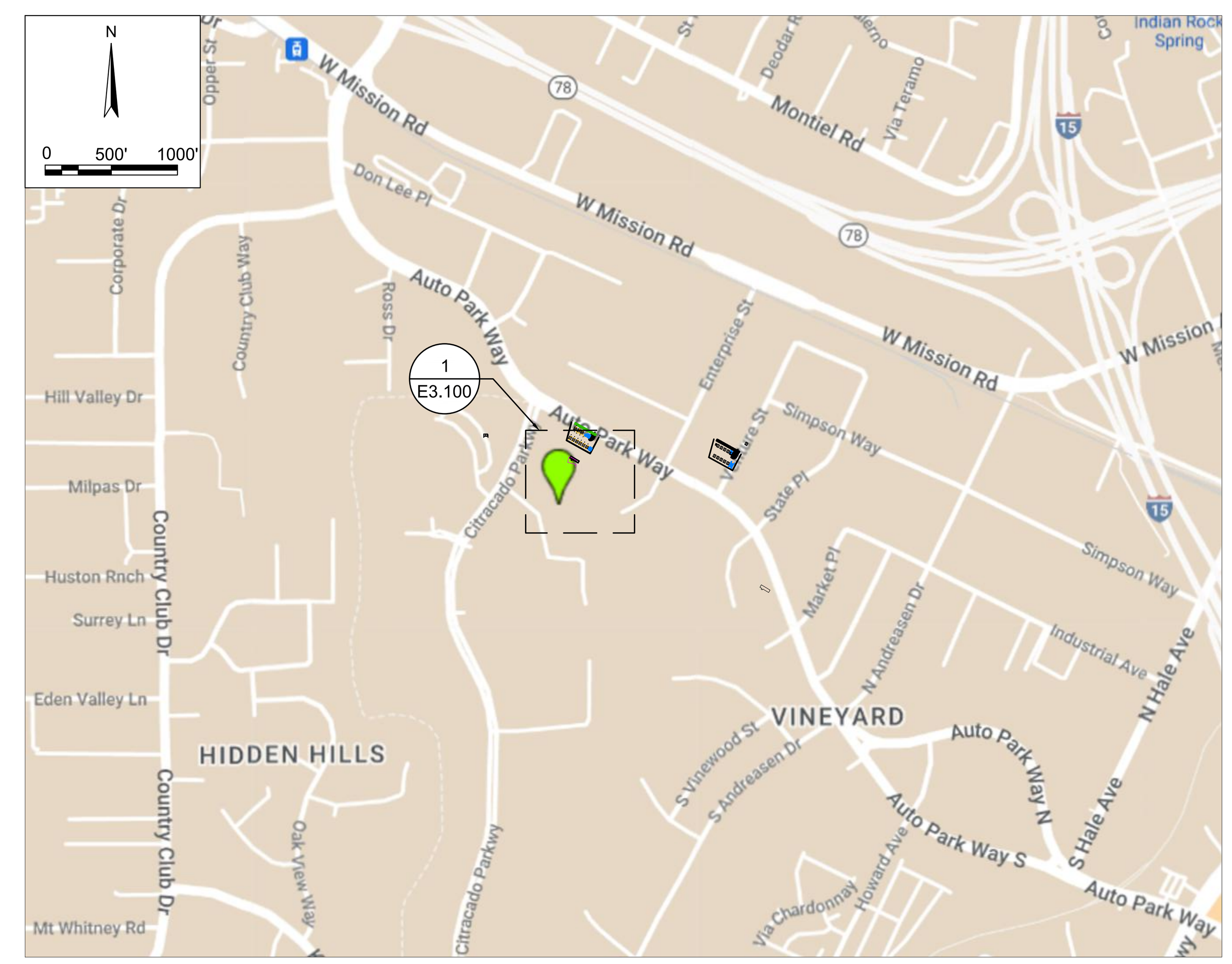
1
E3.100

LEGEND

— — —	EXISTING PARCEL BOUNDARY
- - -	FACILITY BOUNDARY
— — —	EXISTING OVERHEAD ELECTRICAL TRANSMISSION EASEMENT BOUNDARY
— — —	EXISTING OVERHEAD ELECTRICAL TRANSMISSION
———	NEW
———	EXISTING
———	FUTURE
—X—	FENCE
———	NEW GSU TAP-LINE
— ST —	EXISTING UG STORM DRAIN LINE
— W —	EXISTING UG WATER LINE
— NG —	EXISTING UG NATURAL GAS LINE
— E —	EXISTING UG ELECTRICAL LINE
———	NEW RETAINING WALL

GENERAL NOTES

1. FURTHER DETAILS OF THE "GSU TAP-LINE" DESIGN SHALL BE DETAILED IN THE 90% DRAWINGS.
2. FOR MORE INFORMATION ON THE METERING SWITCHGEAR AND SITE SWITCHGEAR, REFER TO THE 60% SLD DRAWINGS PRODUCED BY RAVENVOLT.
3. FOR ALL EXISTING UG UTILITIES, SEE SHEET E4



SITE VICINITY MAP

SCALE: 1" = 1000' - 0"

Figure 2. SITE LAYOUT

CONFIDENTIAL AND COMPETITIVELY SENSITIVE

EPC FIRM

ravenvolt
An ABM Company

PROJECT OWNER

MIDDLE RIVER POWER

SITE

ADDRESS:
201 ENTERPRISE ST
ESCONDIDO, CA 92029

COORDINATES:
33.121727, -117.117625

PROJECT

PROJECT NAME:
ENTERPRISE BESS PROJECT

SYSTEM SIZE:
52MWac, 1HR

GSU TAP-LINE VOLTAGE:
13.8 KV

ELECTRIC UTILITY:
SAN DIEGO GAS AND ELECTRIC (SDG & E)

AHJ:
CITY OF ESCONDIDO

RAVENVOLT PROJECT MANAGER:
CHRIS COPELAND

ELECTRICAL DRAWINGS SET

ISSUE:

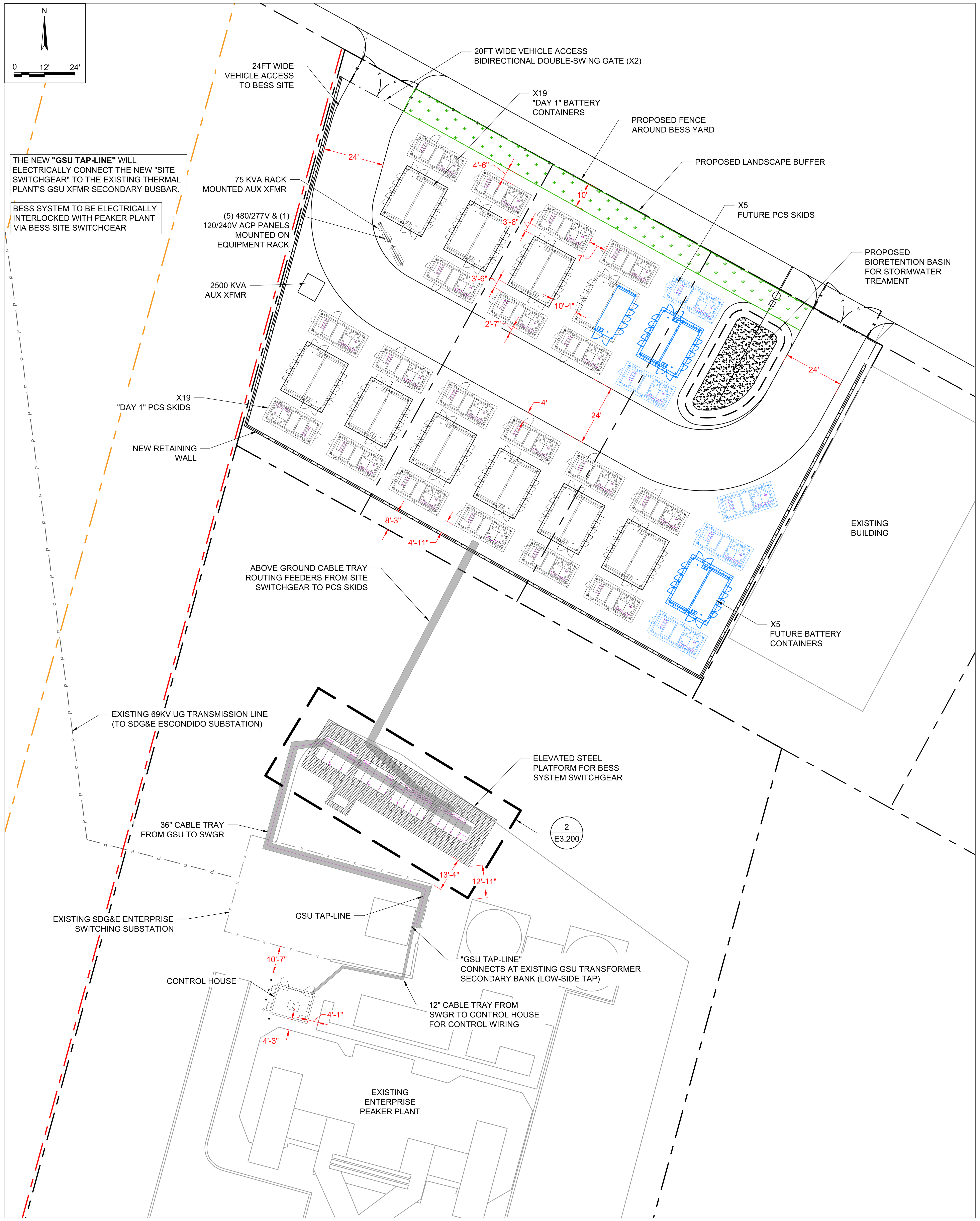
DESIGNED BY: RAVENVOLT	REVIEWED BY: ----
DRAWN BY: J. JAMES	ASSISTED BY: ----

REV	REVISION DESCRIPTION	DATE

SHEET TITLE
SITE VICINITY MAP

DRAWING NUMBER
E3.100

THIS DRAWING IS 24" X 36" AT FULL SIZE



SITE LAYOUT

SCALE: 1" = 24' - 0"

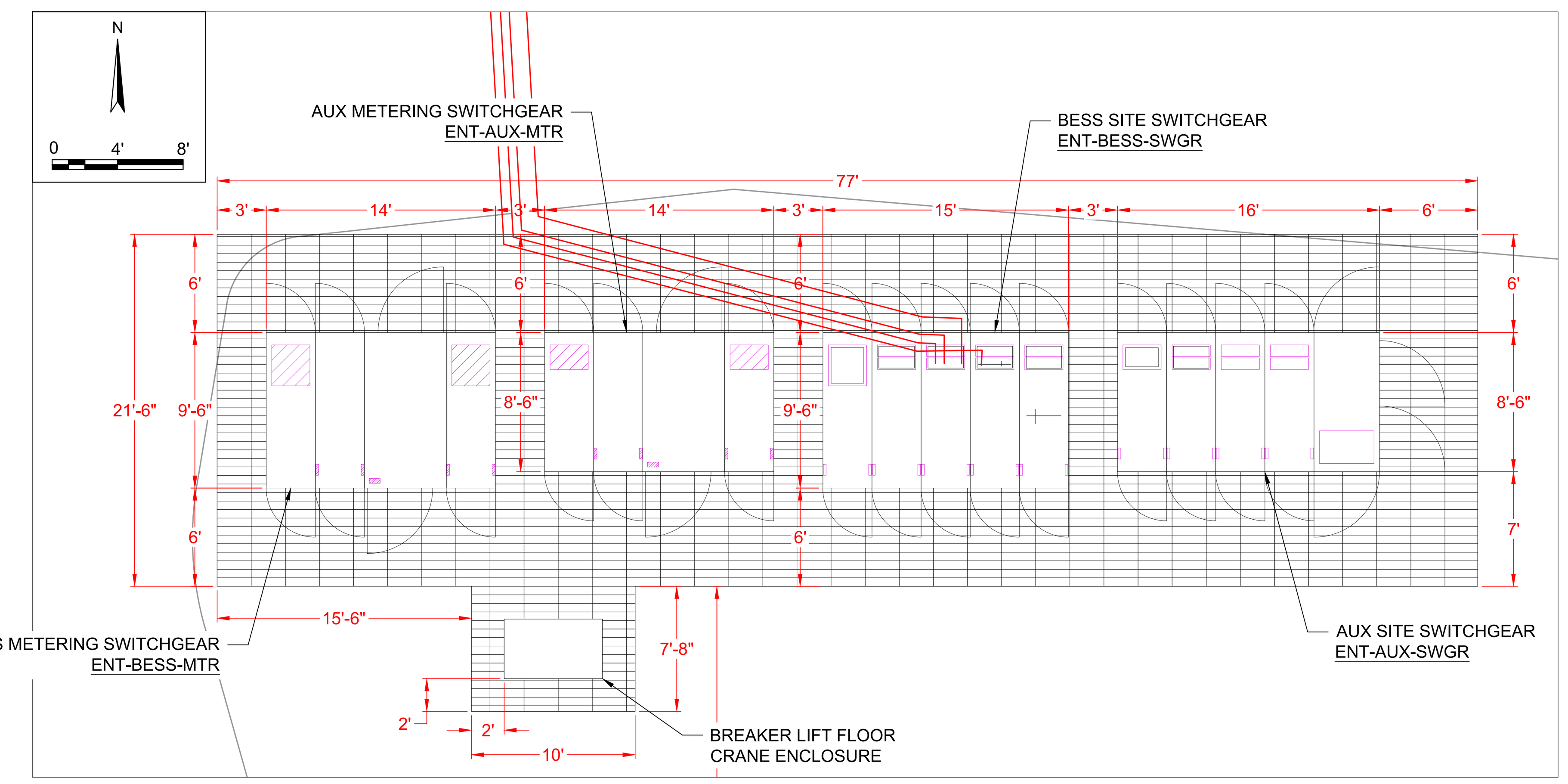
1 / E3.200

LEGEND

- EXISTING PARCEL BOUNDARY
- FACILITY BOUNDARY
- EXISTING OVERHEAD ELECTRICAL TRANSMISSION EASEMENT BOUNDARY
- EXISTING OVERHEAD ELECTRICAL TRANSMISSION
- NEW
- EXISTING
- FUTURE
- FENCE
- NEW GSU TAP-LINE
- EXISTING UG STORM DRAIN LINE
- EXISTING UG WATER LINE
- EXISTING UG NATURAL GAS LINE
- EXISTING UG ELECTRICAL LINE

GENERAL NOTES

1. FOR MORE INFORMATION ON CIVIL SITE DESIGN, SEE KIMLEY-HORN CIVIL DRAWINGS.
2. FOR MORE INFORMATION ON STRUCTURAL FOUNDATION DESIGN, SEE KIMLEY-HORN STRUCTURAL DRAWINGS.



SWITCHGEAR PLATFORM

SCALE: 1" = 8' - 0"

2 / E3.200

DIMENSIONS

APPROXIMATE/ROUNDED MAJOR EQUIPMENT AND PAD DIMENSIONS SHOWN BELOW

SWITCHGEAR

SITE METERING SWITCHGEAR

ENT-BESS-MTR	14' x 9.5' x 9.5'	(LxWxH)
ENT-AUX-MTR	14' x 8.5' x 9.5'	(LxWxH)

SITE SWITCHGEAR

ENT-BESS-SWGR	15' x 9.5' x 9.5'	(LxWxH)
ENT-AUX-SWGR	16' x 8.5' x 9.5'	(LxWxH)

SUNGROW PCS SKID [SC3450UD-MV-US]

EQUIPMENT	19'-10" x 8' x 9.5'	(LxWxH)
PAD	21'-10" x 10'	(LxW)

SYL BATTERY CONTAINER [SU3794U3794KC]

EQUIPMENT	19'-10" x 8' x 9.5'	(LxWxH)
PAD	21'-10" x 18.5'	(LxW)

EPC FIRM

ravenvolt
An ABM Company

PROJECT OWNER

MIDDLE RIVER POWER

SITE

ADDRESS:
201 ENTERPRISE ST
ESCONDIDO, CA 92029

COORDINATES:
33.121727, -117.117625

PROJECT

PROJECT NAME: ENTERPRISE BESS PROJECT

SYSTEM SIZE: 52MWac, 1HR

GSU TAP-LINE VOLTAGE: 13.8 KV

ELECTRIC UTILITY: SAN DIEGO GAS AND ELECTRIC (SDG & E)

AHJ: CITY OF ESCONDIDO

RAVENVOLT PROJECT MANAGER: CHRIS COPELAND

ELECTRICAL DRAWINGS SET

ISSUE:

DESIGNED BY: RAVENVOLT	REVIEWED BY: ----
DRAWN BY: J. JAMES	ASSISTED BY: ----

REV	REVISION DESCRIPTION	DATE

SHEET TITLE: SITE LAYOUT

DRAWING NUMBER: E3.200

THIS DRAWING IS 24" X 36" AT FULL SIZE

EXHIBIT 1

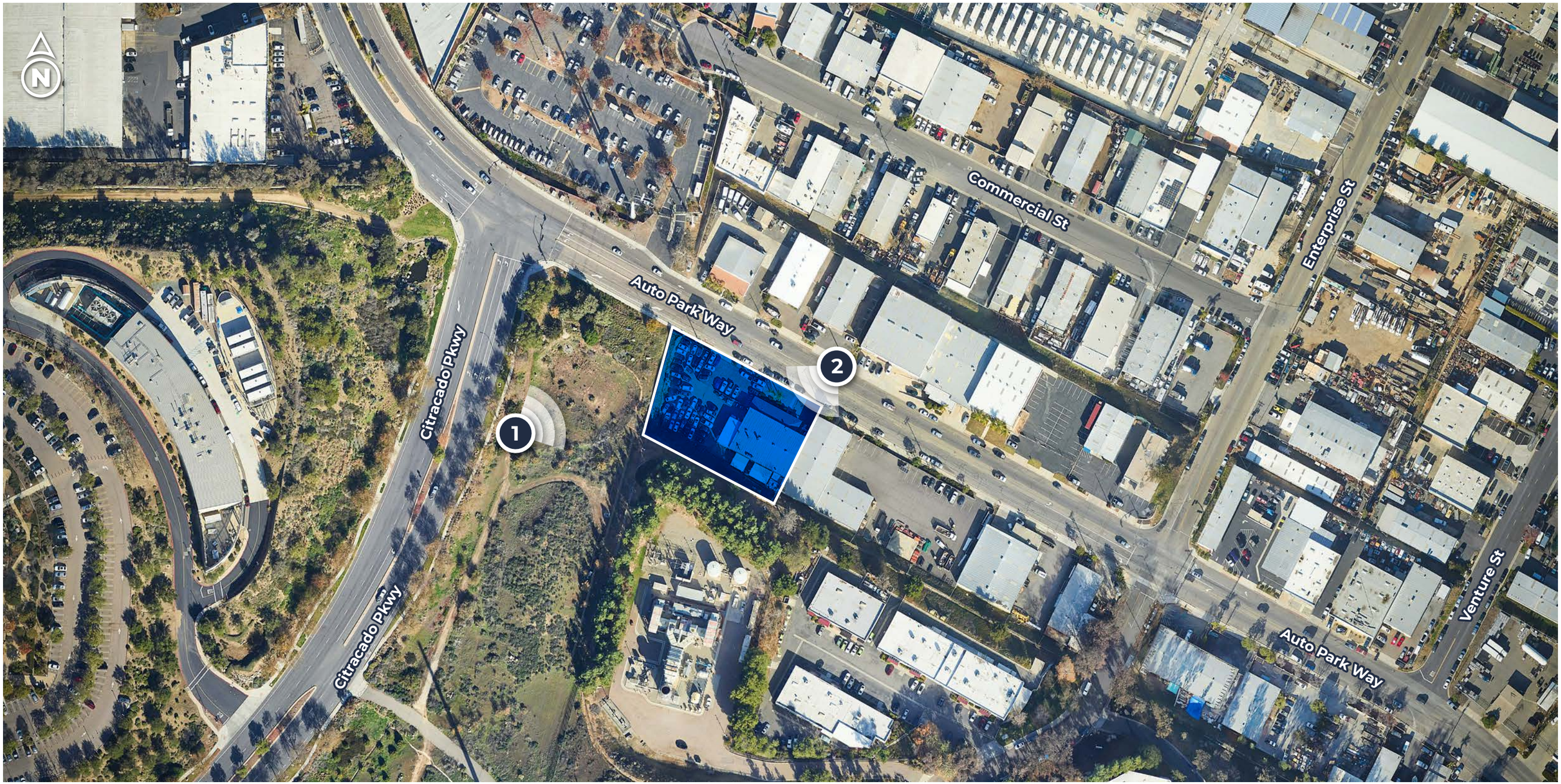
ENTERPRISE
BESS PROJECT

1 Viewpoint Location

Project Site

Photo simulations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.

ENTERPRISE BESS LLC



ENTERPRISE
BESS PROJECT

VIEWPOINT 1

12/27/2024 • 11:43 am • Looking Northeast

1 Viewpoint Location Project Site

Photo simulations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.

ENTERPRISE BESS LLC

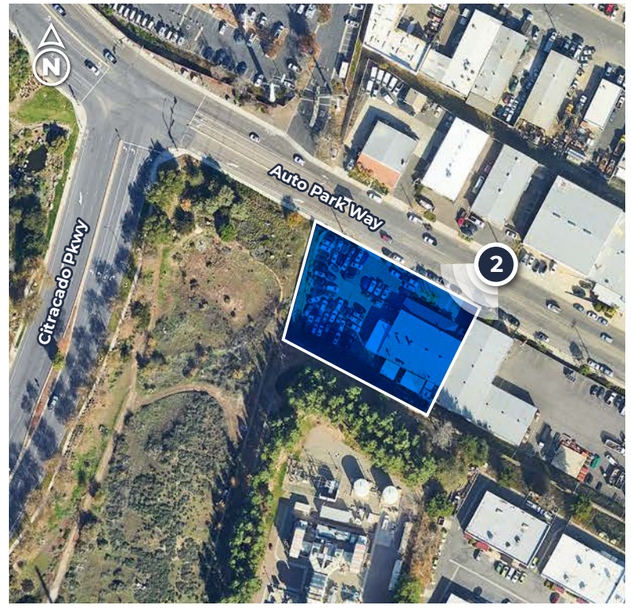
EXISTING CONDITIONS

PROPOSED CONDITIONS

ENTERPRISE
BESS PROJECT

VIEWPOINT 2

12/27/2024 • 12:06 pm • Looking Southwest



2 Viewpoint Location Project Site

Photo simulations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.

ENTERPRISE BESS LLC

ENTERPRISE
BESS PROJECT

AERIAL VIEW

ENTERPRISE BESS LLC

EXISTING CONDITIONS

ENTERPRISE
BESS PROJECT

AERIAL VIEW

ENTERPRISE BESS LLC

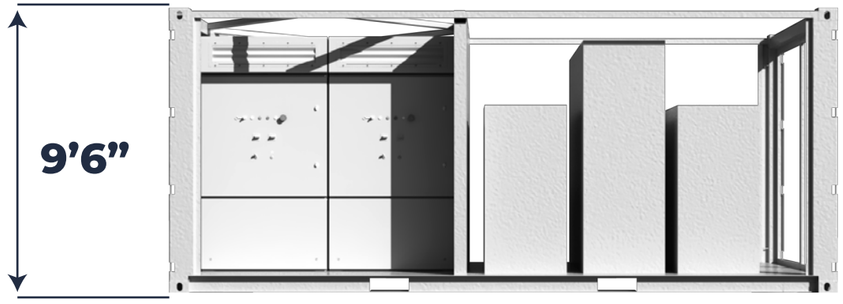
ENTERPRISE
BESS PROJECT

EQUIPMENT ELEVATIONS

ENTERPRISE BESS LLC

BATTERY CONTAINER

MV SWITCHGEAR



PCS SKID

AUX POWER TRANSFORMER

APPENDIX A

ANALYSIS OF THE POTENTIAL EFFECTS OF THE PROPOSED MODIFICATION AND PROPOSED AVOIDANCE AND MITIGATION MEASURES

Section 1769(a)(1)(D) requires "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." This Appendix addresses each discipline considered in the original California Energy Commission (CEC) certification for the Enterprise Emergency Peaker Project.

Note: The sections and subsections of this Appendix A are numbered "5" to coincide with the numbering in the main body of the Supplemental Petition for Post-Certification Amendment.

5.0 ANALYSIS OF THE EFFECTS THAT THE PROPOSED CHANGE WILL HAVE ON THE ENVIRONMENT AND MITIGATION MEASURES PROPOSED

This Appendix A and Section 5 of the Petition for Post-Certification Amendment address the requirements of Title 20, CCR, Section 1769(a)(1)(D).

5.1 Background

CalPeak Power-Enterprise, LLC (CalPeak) hereby files this supplemental petition for amendment of the certification of the Enterprise Emergency Peaker Plant (EEPP; Docket No. 01-EP-10C) on behalf of and for the benefit of Enterprise BESS LLC (this "Supplemental Petition"). Enterprise BESS LLC proposes to implement a nominal, one-hour, 52-megawatt (MW) battery energy storage system (BESS) Project. The proposed Enterprise BESS Project is located on the site of the existing nominal 49.4 MW EEPP and on three adjacent parcels to the north all of which are located in the City of Escondido in San Diego County, California (see Figure 1, Regional Location Map and Figure 2, Site Layout).

The EEPP is located on Assessor Parcel No. (APN) 232-410-45-00 and is owned and operated by CalPeak. The EEPP was licensed by the CEC in 2001. Enterprise BESS LLC proposes to construct and operate a nominal 52-MW BESS project in a coordinated manner with the EEPP. In addition to the co-located and shared facilities, the operational outputs of the EEPP and the BESS will be coordinated to not exceed the California Independent System Operator (CAISO) Aggregate Capability Constraint of 52 MW at the common point of interconnect (POI). Given the relationship between the EEPP and the proposed Enterprise BESS, the CEC has determined that the CEC has jurisdiction over the permitting of the Enterprise BESS project. CalPeak on behalf of Enterprise BESS LLC hereby requests an amendment to the certification for the EEPP (CEC Docket No. 01-EP-10) pursuant to Title 20, California Code of Regulations, Section 1769(a)(1).

As presented in the March 2024 Petition, the proposed Enterprise BESS Project was to be located primarily on the southern portion of the site of the existing EEPP. Installation of the BESS project as previously proposed on the southern portion of the EEPP parcel would have required substantial cut and fill to remove the hillside that abuts the San Diego Gas & Electric Company (SDG&E) Palomar property to the south. The limited site area and required vertical slope cuts to

remove the hillside at the southern EEPP property line present engineering and environmental obstacles to development.

Upon further engineering review and adjacent landowner consultations, it was determined that the potential impacts associated with the cut and fill to remove the hillside could be avoided, and thus the Enterprise BESS Project can be more readily constructed if the modular battery and inverters are installed on the adjacent property(s) to the north along the south side of Auto Park Way which is currently occupied by existing industrial/commercial businesses on APNs 232-410-19, 232-410-20, and 232-410-00. The total acreage of these three parcels is approximately 0.82 acre. The parcels are all zoned M-1, Light Industrial and the Land Use is designated as L-1, Light Industrial.[1]

The interconnection for the Enterprise BESS Project is unchanged by this Supplement. The Enterprise BESS electrical interconnection to the grid will be on the EEPP site using the low side of the existing EEPP generation step-up (GSU) transformer in the EPPP switchyard. This interconnection is central to the Enterprise BESS as it will allow for the BESS and EEPP to be operated in a coordinated manner. The high side of the existing GSU at the EEPP is connected to an existing 69 kilovolt (kV) line that connects to an SDG&E substation located approximately 0.5 mile to the north of the EEPP.

The EEPP and the Enterprise BESS would share co-located, common facilities and would be operated in a coordinated manner. The operational outputs of the EEPP and the BESS will be coordinated to not exceed the CAISO Aggregate Capability Constraint of 52 MW at the common POI.

The EEPP and Enterprise BESS Project will share the following common facilities: GSU, switchyard, gen-tie, and a common POI with the CAISO controlled/SDG&E owned transmission system. The EEPP and the Enterprise BESS Project will each have their own metering equipment and CAISO Resource ID numbers. In addition to the co-located and shared facilities, the operational outputs of the EEPP and the BESS will be coordinated to avoid exceedance of the CAISO Aggregate Capability Constraint of 52 MW at the common POI.

[1] On October 9, 2024, the Escondido City Council voted to approve an Interim Ordinance prohibiting the City from issuing any use permit, variance, building permit, business license, or any other entitlement for use shall be approved or issued for the establishment, construction, or operation of a commercial BESS facility for any location or property within the City of Escondido. On October 20, 2024, the City of Escondido extended their current moratorium on the issuance of any City entitlements for use for new battery energy storage systems through the close of business on October 5, 2025. (Escondido Ordinance No. 2024-14R.) At the end of the moratorium, there is no statutory requirement that the local government act, or refuse to act, in any specified manner. Consequently, it is important to note that the moratorium itself is not a substantive local land use ordinance; it is an statutory process which may or may not result in a later enactment. Moreover, as a matter of law, the Commission's exclusive jurisdiction pursuant to Public Resources Code Section 25500 et seq. cannot be preempted by local ordinance, and the Commission retains all of its legal authorities under the Public Resources Code.

While they will be co-located, the EEPP and the BESS will operate independently and will be entirely separate resources. The EEPP and the BESS will each have their own metering equipment and CAISO Resource ID numbers. The EEPP will remain responsible for the operations of the natural gas facility and will remain as the party responsible for compliance with the Commission Conditions and applicable laws, ordinances, regulations, and standards (LORS) for the EEPP. In like fashion, Enterprise BESS LLC will have legal responsibility for the operation of the BESS and will be the responsible party for compliance with the Commission Conditions and applicable LORS for the BESS.

The Enterprise BESS Project will connect to the grid through the low side of the existing 13.8 kilovolt (kV)/69 kV GSU transformer at the adjacent gas-fired EEPP. The high side of the existing GSU at the EEPP is connected to an existing 69 kV line that connects to an SDG&E substation located approximately 0.5 mile to the north of the EEPP. The two plants will share the following common facilities: GSU, gen-tie, and a common point of interconnect (POI) with the CAISO controlled/SDG&E owned transmission system. Because the operational outputs of the EEPP and the BESS will be coordinated, the facilities will not change the CAISO Aggregate Capability Constraint of 52 MW at the POI.

The Enterprise BESS Project would be charged exclusively from the grid, particularly when excess renewable energy is available, storing this energy for peak periods when renewable energy is less available, resulting in lower total greenhouse gas (GHG) emissions. Furthermore, dispatches from the Enterprise BESS Project would replace energy that would otherwise be generated by the adjacent gas-fired EEPP.

The proposed BESS facility would consist primarily of modular battery storage system enclosures and inverters installed on concrete pad, drilled pier, and/or driven pile foundations. The selected battery technology is lithium iron phosphate (LFP). Batteries would be installed in enclosures that are electrically connected to reach the desired output of BESS. The medium voltage transformers and inverters would be located adjacent to the enclosures they serve. Approximate dimensions for the battery enclosures vary but are typically in the range of approximately 8-feet wide by 20-feet long by 9.5-feet high. The containerized battery systems will include internal heating ventilation and air conditioning and internal fire detection and fire suppression systems in each container, battery management systems, power conversion systems (also called inverters), transformers, and electrical conductors. In addition, the proposed BESS development on the northern parcels area includes a 20-foot-wide, bidirectional double swing gate at the northwest entrance at Auto Park Way and 20-foot-wide internal access roads. The Project also includes an approximately 350-foot-long above ground 13.8 kV gen-tie line installed on an elevated cable tray assembly to connect the BESS to the existing EEPP switchyard GSU transformer. Associated electrical interconnection facilities to be installed on the EEPP site include an elevated steel platform with switchgear and metering equipment as well as additional cable tray connections from the switchgear to the low side of the existing GSU at the EEPP and communication line connections (see Figure 2).

The BESS systems will be certified to UL 9540 safety and all applicable standards for BESS enclosures. Battery output degrades over time requiring replacement and/or additional battery bank modules ("augmentation"). Allowance for this work and the physical enclosures required will be made during construction of the BESS, all within the Project parcels and the environmental impacts analyses of this Supplemental Petition..

The proposed Enterprise BESS facilities are located on a composite area totaling less than 0.1 acre within the northern portion of the existing 2.94-acre EEPP site and 0.82 acre within the northern three parcels. The total construction disturbance footprint for the Project is less than 1.0 acre. The combined site area is bordered to the north by Auto Park Way, to the east and southeast by multiple commercial buildings, to the south by the SDG&E Palomar Energy Center and to the west by vacant, undeveloped land owned by SDG&E, beyond which is Citracado Parkway. Site access for the EEPP site is via the entrance security gate at 201 Enterprise Street and the site access for the northern parcels is via the adjacent Auto Park Way.

The proposed BESS interconnection facilities site area on the EEPP site has been previously disturbed with historical agricultural use, and development of the EEPP in the early 2000s. Given the limited area available for BESS development on the EEPP site, BESS development will occur primarily on the adjacent parcels to the north at 2361 Auto Park Way which has been occupied by auto paint and body related businesses for at least the last 30 years. According to historical resources reviewed, the northern project area was vacant, undeveloped land from at least the late-1930s through at least 1970. Development of the northern parcels area will require demolition and removal of the existing buildings on the site. In addition, limited site topography modification on the southern portion of the northern parcel area will be required to accommodate the modular BESS related facilities. The proposed Project may require removal of up to five of the coniferous trees that were installed along the northern EEPP site perimeter as part of the EEPP landscape plan which provides visual screening for the EEPP. The proposed design includes an engineered retaining wall to be installed near the southern boundary of the northern parcels area. The Enterprise BESS Project will mitigate project impacts in accordance with CEC and other regulatory requirements, as applicable.

The battery system will be controlled by an Energy Management System (EMS) controller, which will be connected to the existing Power Plant Control (PPC) system at the EEPP. The direct current (DC) block EMS will ramp up and down as directed by the EEPP PPC to not exceed 52 MW at the point of interconnection. The PPC active power control at the EEPP consists of power curtailment, ramp rate control, frequency control, power limit control and plant start and shutdown. The PPC controls active power injection at the POI such that export never exceeds the maximum MW capacity of the current interconnection agreement. The power curtailment feature of the PPC maintains active power at the common POI below the curtailment setpoint. The EEPP and BESS would operate simultaneously during ramp up and ramp down between BESS and EEPP operation, but the combined output would never exceed 52 MW at the common POI.

The requested amendment would allow for the Enterprise BESS Project to be constructed and operated adjacent to the EEPP. The Enterprise BESS Project will be constructed in part to support California's current need for additional electrical energy storage available for dispatch during peak load demand time periods in the summer and would advance the State's and the California Public Utility Commission's policy of 60% renewable power by 2030 and 100% by 2045 (Senate Bill 100). The Enterprise BESS Project offers the CAISO a reliable dispatchable energy resource.

The proposed Enterprise BESS Project will not result in an increase in the EEPP's hourly or annual air emissions above currently permitted limits. The environmental impact assessment presented in Section 5 and this Appendix A concludes that with the implementation of the Conditions set forth herein no potentially significant environmental impacts are associated with the implementation of the actions specified in this Petition for Post-Certification Amendment, and that the Project, as specified herein, will comply with all applicable LORS.

Given the relationship between the EEPP and the BESS, the CEC Staff has determined that the CEC has permitting jurisdiction over Enterprise BESS LLC and the BESS project. Accordingly, CalPeak makes the following requests.

First, CalPeak requests an amendment to the certification for the EEPP (CEC Docket No. 01-EP-10) pursuant to Title 20, California Code of Regulations, Section 1769(a)(1) to allow for interconnection of the Enterprise BESS LLC project. The amendment is a change to the EEPP project description in that it includes the interconnection of the BESS at the low side of the existing GSU at the EEPP and the use of the common facilities. CalPeak will remain responsible for operation and compliance with the Commission Conditions and applicable LORS for the EEPP.

Second, CalPeak on behalf of Enterprise BESS LLC requests an amendment to the EEPP certification identifying Enterprise BESS LLC as the party that will have legal responsibility for the operation of the BESS, compliance with any associated Commission Conditions of Certification, and compliance with applicable LORS for the Enterprise BESS Project. A list of proposed BESS-only Conditions of Certification resulting from this request is attached hereto as Appendix B.

Key CEC licensing related documents for the EEPP include:

- Application for Certification (AFC) Pursuant to 21-Day Emergency Permitting Process, CalPeak Enterprise #7, CalPeak Power, LLC, May 7, 2001 (deemed complete on May 16, 2001)
- CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit, June 1, 2001
- CalPeak Enterprise #7 Escondido (01-EP-10), AFC Final Decision, June 6, 2001

Key CEC licensing related documents docketed to date specifically for the Enterprise BESS Project include:

- Petition for Post-Certification Amendment – Part 1 (through Appendix A), Docket date and number: 3/26/2024, TN 255290 (supersedes TN 255070-1 dated 3/14/24)
- Petition for Post-Certification Amendment – Part 2 (Appendices B through G), Docket date and number: 3/14/2024, TN 255070-2
- Application for Confidential Designation for PTA Cultural Resources Appendix, Docket date and number: 3/14/2024, TN 255072
- CEC's Response Letter to CalPeak Power-Enterprise, LLC's Application for Confidential Designation dated 3-14-24, Docket date and number: 4/24/2024, TN 255903
- This Supplemental Petition for Post-Certification.

The BESS-specific documents listed above are being amended in association with this Supplemental Petition. In addition, a new Appendix H, Fire Safety, is provided with this Supplemental Petition.[2]

5.2 Environmental Topic Areas Addressed in Final Commission Decision in June 2001

The CEC's Final Commission Decision for the CalPeak Enterprise #7 Peaker incorporated the CEC Staff Assessment for Emergency Permit dated June 1, 2001 (Staff Assessment), by reference, and the Commission certified the Project on June 6, 2001. The Commission approved the CalPeak Enterprise #7 Peaker Project as an emergency project that was exempted from the California Environmental Quality Act (CEQA) pursuant to Public Resources Code 21080 (b)(4). The CEC Staff Assessment addressed the following environmental topic areas: Air Quality; Biological Resources, Soils and Water, Hazardous Materials Management, Cultural Resources, Paleontological Resources, Noise, Land Use, Traffic and Transportation, Visual Resources, and Environmental Justice. The CEC Staff Assessment also included assessments for Facility Design and Transmission System Engineering. Although the CEC Staff Assessment did not include assessments, it did also include Conditions of Certification for Public Services, Waste Management, and Worker and Fire Safety.

An assessment of the effects that the proposed Enterprise BESS Project will have on the environment with consideration of the topics addressed in the Final Commission Decision/Staff Assessment and current regulations is presented herein. The assessment of potential effects also considers input provided by CEC staff during consultation in 2023 and 2024.

[2] Several other previous Petitions to Amend the CEC License for the EEPP have been filed by the applicant related to changes in ownership and operation. The most recent EEPP specific Petition posted on the CEC's website at the time this Petition was prepared is from 2019 and pertains to changing operational control back to CalPeak Power-Enterprise, LLC from NAES and changing the name of the facility to Enterprise Emergency Peaker Project. The CEC approved the petition request on July 29, 2019.

The balance of this analysis is organized as follows:

- 5.3 Air Quality and Greenhouse Gas
- 5.4 Biological Resources
- 5.5 Soils and Water
- 5.6 Hazardous Materials Management
- 5.7 Cultural Resources
- 5.8 Paleontological Resources
- 5.9 Noise and Vibration
- 5.10 Land Use
- 5.11 Traffic and Transportation
- 5.12 Visual Resources
- 5.13 Environmental Justice
- 5.14 Public Services/Fire Protection
- 5.15 Waste Management
- 5.16 Worker Safety

Based on a review and assessment of the existing CEC Conditions of Certification for the EEPP, the subset of EEPP Conditions that are expected to be applicable to the Enterprise BESS Project are presented in Appendix B (Enterprise BESS-Only Conditions of Certification). Separate technical appendices are also provided as follows: Air Quality and Greenhouse Gas Study (Appendix C), Biological Resources Technical Report (Appendix D), Cultural Resources Technical Report (Appendix E), Noise and Vibration Study (Appendix F), Vehicle Miles Traveled (VMT) Memorandum (Appendix G), and Fire Safety (Appendix H).

As set forth herein, the Enterprise BESS Project will avoid or minimize potentially significant effects on the environment.

5.3 Air Quality and Greenhouse Gas

5.3.1 CEC Certification of EEPP

The CEC Final Decision (CEC 2001a,b) noted air quality concerns expressed by the City of Escondido and some members of the public regarding potential cumulative air quality related impacts from existing and proposed power plants in the area. This concern is not applicable to operation of the proposed Enterprise BESS Project given there are no stationary source emissions associated with operation of the Project. Conditions of Certification (Condition or CoC) AQ-2 and AQ-3 required compliance with San Diego County Air Pollution Control District (SDAPCD) conditions for construction and operation of the power plant. Condition AQ-1 required the

Applicant to limit fugitive dust emissions and other impacts during construction and employ mitigation measures where appropriate. CEC Condition AQ-1 regarding control of fugitive dust emissions is assumed to be applicable to the proposed Enterprise BESS Project as well.

5.3.2 Environmental Analyses

The proposed Enterprise BESS Project site is located within the jurisdiction of the SDAPCD, which has primary responsibility for assuring that federal and state ambient air quality standards are attained and maintained in the air basin. The proposed Project would result in air pollutant emissions that are regulated by the air district. The air emissions expected to be generated during project construction are associated with equipment use on the site, fugitive dust emissions from site grading, and from vehicle trips to and from the site.

During the operation of the proposed Enterprise BESS project, no area source emissions are expected, with the exception of vehicle emissions from infrequent worker trips to and from the project site for maintenance and infrequent battery augmentation events. Emissions from Enterprise BESS Project construction and operations are calculated to be below air district thresholds established to attain and/or maintain conformance with state and federal air quality standards. At the time the EEPP project was permitted in 2001, greenhouse gas assessments were not included in the environmental review and permitting process. A GHG assessment has been prepared for the Enterprise BESS Project as requested by CEC staff during prefiling coordination, and is considered herein as Appendix C, Air Quality and Greenhouse Gas Study. CEC Condition AQ-1 for the EEPP required that a Fugitive Dust Mitigation Plan be prepared, including specific requirements. It is assumed that the same Condition AQ-1 will apply to the Enterprise BESS Project.

In summary, no adverse impacts related to air emissions associated with construction or operation of the Enterprise BESS Project are expected to occur. For a more detailed analysis, see Appendix C, Air Quality and Greenhouse Gas Study.

5.3.3 Mitigation Measures

The Enterprise BESS project will not result in significant impacts related to air quality and greenhouse gas emissions that will require additional mitigation measures.

5.3.4 Consistency with LORS

The Project conforms to applicable LORS related to air quality and greenhouse gas emissions.

5.3.5 Conditions of Certification

The proposed modifications do not require changes to the CoCs for air quality. CEC Condition AQ-1, Fugitive Dust Mitigation Plan, is assumed to be applicable to the Enterprise BESS Project. CEC

Conditions AQ-2 and AQ-3 for the EEPP are not applicable to the Enterprise BESS Project, as they relate to combustion emissions from the peaker plant.

5.3.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____. 2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

5.4 Biological Resources

5.4.1 CEC Certification of EEPP

As discussed in the CEC Final Decision (CEC 2001a), the proposed EEPP project was located on previously disturbed vacant land adjacent to an industrial park surrounded by light industrial and commercial properties. The proposed transmission line would connect to an existing transmission corridor bordering the property, and the natural gas line would parallel existing paved roads and traverse industrial and commercial areas. These facilities were built following CEC approval of the EEPP Project in 2001.

The CEC Staff Assessment identified Diegan Coastal Sage Scrub as occurring in small patches within habitat in the vicinity of the EEPP project, and noted that sensitive species, including the California gnatcatcher use Diegan Coastal Sage Scrub as habitat. These areas were determined to not be affected by the construction and operation of the EEPP project. Per Condition of Certification BIO-9 they were required to be fenced, and a project biologist was stipulated to be onsite to observe construction activities. Further, non-native grassland at the site was determined to provide potential foraging habitat for raptors and other wildlife. Conditions of Certification BIO-7 and BIO-8 required an approved biologist to conduct appropriate surveys to identify the extent, if any, of these species. If needed, mitigation plans were to be submitted under Condition of Certification BIO-10.

The CEC Staff Assessment for the EEPP addressed the concern for biological resources through avoidance of all significant non-mitigatable impacts to species and habitat, restoration of the site and the construction laydown area, and for re-establishing biological resource values upon decommissioning of the site, as provided in Conditions of Certification BIO-1, BIO-2, BIO-3, BIO-6, and BIO-11.

The CEC Final Decision determined that the Conditions of Certification proposed in the Staff Assessment provided appropriate mitigation measures for the affected biological resources.

5.4.2 Environmental Analyses

5.4.2.1 Current Baseline Conditions

Previous biological surveys and assessments for the EEPP site associated with permitting in 2001 identified various potential sensitive biological resources, including Diegan Coastal Sage Scrub (DCSS) and non-native grassland (NNG) that could potentially be impacted by project development at the time and locations considered. DCSS and NNG were identified as being present on the southern portion of the EEPP parcel to the north of the adjacent SDG&E Palomar Energy Center site. The proposed Enterprise BESS Project component locations are located on the northern portion of the overall EEPP property as well as the three adjacent developed parcels to the north adjacent to the south side of Auto Park Way. The disturbance footprint for the Enterprise BESS Project as proposed and analyzed in this Supplemental Petition for Post-Certification Amendment completely avoids impacts to sensitive plant species including DCSS and NNG as well as potentially associated wildlife species such as coastal California gnatcatcher. The vegetation community types present are Ornamental, Disturbed, and Urban/Developed as shown in Appendix D. The Ornamental vegetation present on the northern portion of the EEPP site where the proposed gen-tie cable tray route traverses is mature Canary Island pines that were planted over 20 years ago as part of the required landscaping plan for the EEPP.

Literature review followed by reconnaissance level and protocol surveys to map trees and habitat, survey for nesting birds and raptors, and reconfirm the lack of protected species/habitat, and/or wetlands were performed for the Enterprise BESS Project site and study area in 2023 and 2024 by Rincon biologists. The results of the surveys and an assessment of project impacts and mitigation recommendations for biological resources are presented in Appendix D.

Key findings from the Rincon biological resources assessment presented in Appendix D follow.

Vegetation

The following three vegetation community/land cover types occur within the approximate 1.98-acre Project Area boundary: urban/developed, disturbed, and ornamental. Brief descriptions follow.

Urban/Developed. This community comprises approximately 1.25 acres within the Project Area boundary. Areas considered urban/developed have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, roadways, and landscaped areas that often require irrigation.

Disturbed Habitat. This community comprises approximately 0.22 acre within the Project Area boundary. Areas mapped as disturbed habitat contain a cover of highly disturbed annual, non-native grasses. These areas have been physically disturbed by previous human activity and are no longer recognizable as a native or naturalized vegetation association.

Ornamental. This vegetation community comprises approximately 0.51 acre of ornamental vegetation within the Project Area boundary. Ornamental vegetation within the EEPP site perimeter includes numerous Canary Island pine trees (*pinus canariensis)* that provide a visual buffer around the north, northeastern, and northwestern boundaries of the EEPP site. Ornamental vegetation within the Project Area boundary is present within the EEPP/BESS site including the gen-tie cable tray route to the north. In addition, limited scattered ornamental landscaping including three palm trees is located on the south side of Auto Park Way on the northern parcels area.

General Wildlife

The Study Area for biological resources, including the area to the west of the Project site and its surroundings provides habitat for wildlife species that commonly occur in urbanized and disturbed habitats within San Diego County. Wildlife species observed/detected on or adjacent to the site include Cooper's hawk (Accipiter cooperii; CDFW Watch List), red-tailed hawk (Buteo jamaicensis), California towhee (Pipilo crissalis), Anna's hummingbird (Calypte anna), Allen's hummingbird (Selasphorus sasin), song sparrow (Melospiza melodia), American crow (Corvus brachyrhynchos), mourning dove (Zenaida macroura), house finch (Haemorhous mexicanus), house wren (Troglodytes aedon), black phoebe (Sayornis nigricans), northern mockingbird (Mimus polyglottos), hooded oriole (Icterus cucullatus), and lesser goldfinch (Spinus psaltria). Several old small rodent burrows were observed, but no indication of any larger mammal burrows was present.

Special-status Biological Resources

Sensitive biological resources have the potential to occur within the Project Area boundary and larger Study Area as described below. Local, state, and federal agencies regulate special status species and may require an assessment of their presence or potential presence to be conducted prior to the approval of proposed development on a property. Based on a query of the CDFW California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) Inventory in 2025, there are 113 special-status plant species and 73 special-status wildlife species documented within the Escondido, California USGS 7.5-minute quadrangle and the eight surrounding quadrangles, which covers a radius of over 10 miles. All 186 special-status species have been evaluated for potential to occur within the Project Study Area (see Attachment F in Appendix D for more information).

Special-status Wildlife Species

The database queries and literature review performed for the Project indicated 73 special status wildlife species have been documented within the Escondido USGS 7.5-minute quadrangle and eight surrounding quadrangles. The review of biological databases resulted in the identification

of 34 special-status wildlife species occurring within five miles of the Study Area. Of these, Rincon determined that 15 species have at least a low potential to occur due to the presence of suitable habitat in the larger Survey Area (see Attachment F in Appendix D). One special status-status wildlife species, an adult male Cooper's hawk (*Accipter cooperii*), was observed within the Project Area boundary during the reconnaissance-level biological field surveys in 2023. Coastal California gnatcatcher has a potential to occur within the larger Study Area based on the habitat present, but no documented evidence has been recorded in the past or during protocol surveys conducted specifically for this Project.

Nesting Birds and Raptors. The Study Area contains suitable nesting habitat for a variety of native avian species protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) Section 3503. The Project Study Area contains marginal quality, but suitable habitat for special-status species such as Coastal California gnatcatcher (CAGN) and contains suitable stands of large coniferous trees that could be utilized by Cooper's hawks. Generally, most native bird species that could nest on or adjacent to the Project do not have a special-status designation, but are addressed herein based on the protections afforded under the MBTA and CFGC, and the potential for impacts to active nests during the nesting season. The nesting season generally extends from February through September, but can vary based upon annual climatic conditions. Species of birds common to the area that typically utilize open disturbed habitats for foraging, or scrub, oak trees or landscaped trees for nesting habitat, such as northern mockingbird, house wren, song sparrow, American crow, lesser goldfinch, mourning dove, Anna's hummingbird, California towhee, or red-tailed hawk were detected during the reconnaissance-level biological surveys.

Coastal California Gnatcatcher. Coastal California gnatcatcher (CAGN), a federally threatened and SSC-covered species, is an obligate, permanent resident of Coastal Sage Scrub below 2,500 feet in southern California. This species occurs in low Coastal Sage Scrub in arid washes and on mesas and slopes. The Project Study Area includes marginal suitable habitat for CAGN. Therefore, protocol surveys were recommended by CEC CoC BIO-7 in accordance with USFWS requirements to further evaluate if any CAGN were utilizing the Study Area. Protocol surveys were conducted by Helix (Helix, 2001) prior to the original construction for the EEPP Project and survey results were negative. An updated series of presence/absence protocol breeding surveys were conducted within the breeding season and adhered to the frequency requirements outlined in the current USFWS survey protocol. Surveys were conducted from April 19, 2023 through May 24, 2023 to further evaluate any potential CAGN territories that could be affected by short-term Project construction activities, including vegetation clearance, and long-term habitat loss and indirect impacts.

In accordance with the USFWS survey protocol, a minimum of six breeding season surveys were conducted at least one week apart prior to anticipated construction timeline for the Project. The results of the surveys were negative. Additional USFWS protocol non-breeding CAGN surveys (nine, at least 2 weeks apart) were conducted within the non-breeding season. Surveys began on

October 17, 2023, and were completed on February 13, 2024 and the results were negative. The documentation of the protocol surveys is included in Appendix D. The results of all of the surveys conducted for CAGN were negative.

Cooper's Hawk. Cooper's hawk is a California Department of Fish and Wildlife (CDFW) Watch List (WL) covered species that is typically found in woodland and forested habitats, and is found throughout urban landscapes where cover and prey are available. They typically nest in riparian growths of deciduous trees, oaks, canyon bottoms, and pines. The Project Area boundary and larger Study Area contains songbird prey availability with adjacent tree and shrub habitat to the north, south, central, and west. An adult male Cooper's hawk individual was observed emerging from a Canary Island pine tree and perching and vocalizing along the southern fence line of the site. A pair was not observed during the reconnaissance-level biological surveys. There was no evidence of an active nest or behavior suggesting a nest was present within the larger Study Area; however, based on the suitable nesting and foraging habitat within the Project Area boundary and Study Area, this species has a high potential to occur as a transient or could potentially nest in the surrounding woodland or ornamental habitat.

Special-status Plant Species

No federal or state listed plants were observed during the reconnaissance-level biological field surveys. Refer to Appendix D for more information.

Sensitive Vegetation Communities

Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. CDFW maintains a list of plant communities that are considered sensitive. As discussed previously, no sensitive native vegetation types were documented to occur within the expected impact area for the proposed Project.

Critical Habitat

Federally Designated Critical Habitat (DCH) does not occur within the Project Area boundaries or the Survey Area.

Aquatic Resources

Concrete stormwater v-ditches, approximately 3-feet wide exist within the Project Area boundary, occurring near the parcel boundary to the north between the EEPP and the three northern parcels. The v-ditch currently functions to catch sheet flow rainfall and serve as erosional control, while transporting water off site. This concrete-lined feature does not convey water except for local runoff during storms, and does not have any habitat value. The ditch is not

a jurisdictional water of the United States, Water of the State, or streambed as defined by resource agency regulations. No such waters occur in the Project Area boundary or larger Study Area.

Habitat Connectivity and Wildlife Corridors

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. The areas surrounding the Project are developed, and the site is not situated in an area that would be conducive to use as a movement route for wildlife making local or regional movements.

5.4.2.2 Summary of Impacts

Potential impacts to biological resources that may occur from implementation of the Enterprise BESS Project are considered in the context of the required CoCs from the 2001 CEC license, and additional mitigation measures are recommended where needed. Construction-related activity and non-paved ground disturbance from the Project will involve demolition, grading, rock excavation, trenching, foundation drilling, and installation and operation of battery energy storage facilities. Impacts will occur primarily in the northern portion of the Project Area which includes Urban Developed, Ornamental, and Disturbed habitat. It is assumed that applicable CoCs developed for the original EEPP Project will be required conditions under the licensing of the BESS Project and will be implemented. The CoCs include conditions BIO-1 through BIO-11, as follows:

- ***BIO-1:*** *The Project permitted under this emergency process will avoid all impacts to legally protected species and their habitat on site, adjacent to the site and along the right of way for linear facilities.*
- ***BIO-2:*** *The Project permitted under this emergency process will avoid all significant non-mitigatable impacts to designated critical habitat (wetlands, vernal pools, riparian habitat, preserves) on site or adjacent to the site.*
- ***BIO-3:*** *The Project permitted under this emergency process will avoid all impacts to locally designated sensitive species and protected areas.*
- ***BIO-4:*** *The Project permitted under this emergency process will reduce risk of large bird electrocution by electric transmission lines and any interconnection between structures, substations and transmission lines by using construction methods identified in 'Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 1996' (APLIC 1996).*
- ***BIO-5:*** *The Project biologist, a person knowledgeable of the local/regional biological resources, and Compliance Project Manager (CPM) will have access to the site and linear rights-of-way at any time prior to and during construction and have the authority to halt construction in an area necessary to protect a sensitive biological resource at any time.*
- ***BIO-6:*** *Upon decommissioning the site, the biological resource values will be reestablished at preconstruction levels or better.*

- ***BIO-7:*** *Prior to any site mobilization a FWS approved biologist will conduct protocol surveys of the project site and the construction laydown area for coastal California gnatcatchers.*
- ***BIO-8:*** *Prior to any Project-related activities that will occur during the raptor breeding season (March 15 – August 15), a qualified biologist will conduct surveys of the Project site and the surrounding habitat within a half-mile radius of the Project Area boundary. Survey methodologies will allow for a thorough search of these areas to identify potential arboreal and/or ground nesting raptor species.*
- ***BIO-9:*** *The Project biologist, prior to site mobilization, will fence off all sensitive natural resource areas including all DCSS habitat. The Project biologist will then be present onsite during construction until a date determined by the CPM. Finally, the Project biologist, along with the CPM will perform a site review for sensitive habitat impacts at the end of construction.*
- ***BIO-10:*** *Prior to any operational activities, the applicant will submit a report of any impacted habitat to the CPM for review. The applicant will then develop mitigation compensation plans using a 2:1 ratio for DCSS and a 0.5:1 ratio for NNG.*
- ***BIO-11:*** *At a time to be determined by the CPM, the applicant will develop a restoration plan for impacts resulting from grading and other activities within the construction laydown area.*

It is expected that no impacts to DCSS or NNG will occur, thus Condition BIO-10 is considered unlikely to be applicable. In addition, a construction laydown area has not been identified for the Project and it is expected that Condition BIO-11 will also not be applicable.

With implementation of applicable existing CoCs and addition of a new recommended Condition (BIO-12, Worker Environmental Awareness Program for biological resources), impacts would be less than significant.

A summary of Project disturbance by habitat and/or land cover type, including expected mitigation requirements is presented in Appendix D.

It is expected that impacts associated with the potential removal of Canary Island pine trees associated with installation of the gen-tie cable tray will be mitigated via onsite replacement in accordance with a forthcoming landscape plan and/or via purchase of mitigation credits at an offsite bank such as the City of Escondido's Daley Ranch Conservation Bank. Refer to the biological resources assessment, including the arborist's report in Attachment D in Appendix D for more information.

5.4.3 Mitigation Measures

As discussed in Section 5.4.2.2 (above), in addition to the existing biological resources Conditions of Certification stipulated in 2001 for the EEPP, an additional measure "BIO-12 – Worker Environmental Awareness Program (WEAP)" is recommended to be added to protect sensitive biological resources. The proposed wording of the new Condition is as follows:

BIO-12: *The applicant shall have a Worker Environmental Awareness Program (WEAP) for the construction crew that will be developed and implemented by a qualified biologist.*

Verification: *Each employee (including temporary, contractors, and subcontractors) will receive the WEAP on the first day of working on the proposed Project. They will be advised of the potential impact to the listed species and the potential penalties for taking such species. At a minimum, the WEAP will include the following topics: occurrence of the listed and sensitive species in the area, their general ecology, sensitivity of the species to human activities, legal protection afforded these species, penalties for violations of federal and State laws, reporting requirements, and Project features designed to reduce direct and indirect impacts to these species, including nesting birds, and promote continued successful occupation of the Project area environs.*

With implementation of recommended Condition BIO-12 in addition to existing CEC Conditions BIO-1 through BIO-11, as applicable, the Enterprise BESS Project will not result in significant impacts related to biological resources that will require additional mitigation measures. Refer to the biological resource assessment presented in Appendix D for more information.

5.4.4 Consistency with LORS

The Project conforms to applicable LORS related to biological resources.

5.4.5 Conditions of Certification

With the addition of recommended Condition BIO-12 (WEAP), no further changes to the CoCs for biological resources are necessary.

5.4.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____. 2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

5.5 Soil and Water

5.5.1 CEC Certification of EEPP

The CEC Final Decision (CEC 2001a) determined that the construction and operation phases of the proposed EEPP project presented the potential for erosion and sedimentation through ground disturbance and runoff. The applicant (CalPeak) proposed detailed erosion prevention and sediment control measures including grading, compacting, and seeding/mulching exposed soils. Standard Conditions of Certification SOIL & WATER-2 and SOIL & WATER-6 ensured that necessary erosion and storm water plans were finalized. The Commission Decision determined that the conditions proposed in the Staff Assessment (CEC 2001b) provided appropriate mitigation measures for the soil and water issues.

The CEC Final Decision included Conditions for the EEPP, some of which are also applicable to the Enterprise BESS Project as discussed in Section 5.5.5.

5.5.2 Environmental Analyses

5.5.2.1 Water Usage and Supply

Short-term construction water needs for the Enterprise BESS Project are planned to be met via the existing City supplies at the EEPP and northern parcels areas and/or to be trucked to the construction site areas by the construction contractor. Water for dust control and other construction needs is estimated at up to 5,000 gallons per day during demolition and site grading and leveling activities and to average 2,000 – 3,000 gallons per day for the balance of construction activities involving ground disturbance and other dust generating activities. During the construction phase, portable chemical toilets supplied and maintained by the construction contractor would be utilized.

Routine operation of the unmanned Enterprise BESS facility is not expected to have any associated water needs. No potable water connection is needed associated with operation of the BESS facility. No sanitary sewage service would be required. During the operational phase, the BESS facility would use a portable chemical toilet at the adjacent EEPP facility, which would be emptied of waste as needed. Fire water is available via a fire water connection point at the adjacent peaker facility that is connected to the City water supply at the EEPP. In addition, fire water will be available via a fire water connection to the existing City water supply that will be established for the northern parcels site. The Enterprise BESS Project proposes ornamental landscaping along the Auto Park Way frontage. In addition, the applicant proposes to plant approximately eight Canary Island pine trees on the EEPP parcel to replace trees that will be removed during Project development. As needed, water would be obtained from the existing City water supplies at the EEPP and the northern parcels site.

5.5.2.2 Soils

As discussed in the CEC Staff Assessment for the EEPP in 2001 (CEC 2001b), during project construction and operation, wind and water action can erode unprotected surfaces. Areas of impervious surfaces (paved, compacted, etc.) can create increased runoff conditions, thereby resulting in potential erosion on unprotected down-gradient surfaces. The CEC, as sole permitting authority, will approve all grading and erosion control plans through the Chief Building Officer and the Compliance Project Manager (CPM). An Erosion and Sediment Control plan will be developed by the Applicant and submitted to the CPM for approval prior to site mobilization (SOIL & WATER-2).

The Federal Emergency Management Agency (FEMA) has mapped the project area as being located outside the 100-year flood hazard zone and to be located in Zone X, Area of Minimal Flood Hazard (FEMA 2024). The grading and drainage plan for the Project will ensure that stormwater flows and runoff are properly controlled to prevent onsite and offsite flooding and/or concentrated, high-volume flows and accelerated erosion.

Construction of the peaker plant did not require an NPDES permit to address Storm Water Runoff from Construction Activities in accordance with CEC Condition SOIL & WATER-1 because the EEPP project disturbance was less that than the threshold of 5 acres at the time in 2001. The NPDES requirement is now 1 acre, and since the proposed Enterprise BESS Project disturbance footprint is less than 1 acre, it is expected that an NPDES permit will not be required. Part of the NPDES permitting process includes the submission to the Regional Water Quality Control Board (RWQCB) of a Notice of Intent (NOI) application and the development of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP requirements include an erosion control and stormwater management plan that identifies best management practices (BMPs) to be implemented during construction activities.

As required, the Enterprise BESS project will comply with applicable NPDES/SWPPP requirements, including implementation of appropriate BMPs.

During project construction and operation, wind and water action can erode unprotected surfaces. Areas of impervious surfaces (paved, compacted, etc.) can create increased runoff conditions, thereby resulting in potential erosion on unprotected down-gradient surfaces. CalPeak identified the need to develop an Erosion Prevention and Sediment Control Plan (EPSCP) for the EEPP.

As required, the Enterprise BESS Project will prepare an EPSCP and will comply with applicable EPSCP requirements, including implementation of appropriate BMPs to control stormwater runoff flows and water quality. Construction activities will not result in adverse construction or operational phase related impacts to soil erosion and sedimentation to water resources.

In summary, no adverse impacts to soil and water resources associated with construction or operation of the Enterprise BESS Project are expected to occur.

5.5.3 Mitigation Measures

The Enterprise BESS Project will not create a significant impact on soil or water resources that will require additional mitigation measures.

5.5.4 Consistency with LORS

The Project conforms to applicable laws related to soil and water resources.

5.5.5 Conditions of Certification

The proposed Enterprise BESS Project will not require changes to the CEC standard CoCs for soil and water resources except as noted below. The soil and water resources related EEPP Conditions of Certification that are expected to be applicable to the Enterprise BESS project are as follows:

SOIL&WATER-1: *Prior to ground disturbance, the project owner shall obtain CPM approval of a Storm Water Pollution Prevention Plan (SWPPP) as required under the General Storm Water Construction Activity Permit for the project.*

It is expected that the Enterprise BESS Project will not need to comply with this Condition. This Condition did not apply to the EEPP and it is not expected to be applicable to the Enterprise BESS Project given that the qualifying disturbance acreage as of 2025 is 1 acre and the disturbance footprint for the Enterprise BESS Project is calculated to be approximately 0.97 acre.

SOIL&WATER-2: *Prior to ground disturbance, the project owner shall obtain CPM approval of an Erosion Prevention and Sedimentation Control Plan (EPCSCP). The plan will maintain natural drainage patterns to the extent possible, minimizing any potential impacts to the adjacent drainage.*

The Enterprise BESS Project will comply with this Condition.

SOIL&WATER-3: *Prior to site mobilization, the project owner shall submit to the CPM, a copy of a valid water service agreement for water supplies for the project from an authorized water purveyor, or a copy of a valid well permit for the project from the appropriate licensing agency.*

The Enterprise BESS Project will comply with this Condition, as applicable. The proposed Project does not require an operational water supply, thus it is assumed that this Condition would not apply. It is currently expected that limited water needs will be met by tapping the existing municipal supplies at the EEPP and the northern parcels site.

SOIL&WATER-5: *Prior to construction, the project owner shall submit to the CPM, a copy of the completed geotechnical report.*

The Enterprise BESS Project will comply with this Condition.

SOIL & WATER-6: *The Applicant will develop Storm Water Pollution Prevention Plans for construction and industrial activities, including all applicable BMP's.*

Enterprise BESS will submit SWPPPs, as applicable, to the CPM for approval prior to any qualifying construction and industrial activities, respectively. As discussed under SOIL & WATER -1, it is expected that a construction SWPPP will not be required.

5.5.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____. 2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

FEMA. 2024. National Flood Hazard Layer FIRMette (2012). Website accessed February 15, 2024. Panel 06073C1076G.

5.6 Hazardous Materials Management

5.6.1 CEC Certification of EEPP

The CEC Final Decision (CEC 2001a) included a summary of hazardous material management related issues associated with the EEPP. The assessment of the proposed EEPP project included the consideration of the use of aqueous ammonia (19.5%) and natural gas. The CEC Staff Assessment (CEC 2001b) noted that there were light industrial/commercial properties located adjacent to the proposed EEPP facility. It was CEC Staff's belief that the probability of serious impacts associated with an accidental release was insignificant at these adjacent properties. Staff recommended that standard conditions regarding hazardous materials handling be imposed for the EEPP project. Staff also concluded that the use of aqueous ammonia would preclude any potential for significant impact at the nearest residences which were identified as being more than about 1200 feet from the then proposed EEPP project.

The proposed Enterprise BESS Project will not involve the use of aqueous ammonia or natural gas at the EEPP. The proposed Enterprise BESS Project will use lithium phosphate (LFP)r batteries. Lithium ion batteries are subject to the U.S. Department of Transportation (DOT) Hazardous Materials Regulations (HMR; 49 CFR Parts 171–180). This includes packaging and standard hazard communication requirements (e.g., markings, labels, shipping papers, emergency response information) and hazmat employee training requirements related to transportation. The BESS systems will be certified to UL 9540 safety standards for BESS enclosures.

5.6.2 Environmental Analyses

The Enterprise BESS Project will not result in the use of hazardous materials used in excess of permitted quantities. In addition, the Enterprise BESS Project will not result in an increase of waste generation at the site. Batteries may be replaced during augmentation events in the operational phase due to battery degradation. Spent batteries would be handled as Universal Waste and recycled and/or disposed of offsite in an approved manner. Therefore, no impacts from hazardous materials handling or waste management are expected.

5.6.3 Mitigation Measures

The Enterprise BESS Project will not create a significant impact from hazardous materials handling that will require additional mitigation measures.

5.6.4 Consistency with LORS

The project conforms to applicable laws related to hazardous materials handling.

5.6.5 Conditions of Certification

The proposed Enterprise BESS Project does not require changes to the EEPP CoCs for hazardous materials handling as listed below. The Enterprise BESS Project will comply with CoCs HAZ-1 and HAZ-2 as follows:

HAZ-1: *The project owner shall not use any hazardous material in reportable quantities except those identified by type and quantity in the Application for Certification unless approved by the CPM.*

Verification: *The project owner shall provide in the Annual Compliance Report a list of hazardous materials used at the facility in reportable quantities.*

The Enterprise BESS Project will comply with this Condition, as applicable.

HAZ-2: *The project owner shall submit both the Business Plan and Risk Management Plan to the CPM for review and comment, and shall also submit these plans and/or procedures to the County Fire Department for approval.*

Verification: *30 days (or a CPM-approved alternative timeframe) prior to the initial delivery of any hazardous materials in reportable quantities to the facility, the project owner shall submit the Business and Risk Management Plan to the CPM for review and comment. At the same time, the project owner shall submit these plans to the County Fire Department for approval. The project owner shall also submit evidence to the CPM that the County Fire Department approved of these plans, when available.*

The Enterprise BESS Project will comply with these Conditions, as applicable. Refer to Appendix H for more information regarding Fire Safety.

5.6.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____. 2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

5.7 Cultural Resources

5.7.1 CEC Certification of EEPP

As reported in the CEC Staff Report (CEC 2001b), the EEPP project site, laydown area, and 200-foot transmission line were subject to an archaeological pedestrian survey carried out in March 2001. Results of this survey yielded one isolate Mano which was determined to be out of context and, therefore, not of great archaeological significance. An additional archaeological survey was conducted on May 14, 2001 during a site visit conducted by CEC cultural resource staff. No other cultural remains were observed during this survey.

A literature review and record search documenting all cultural resources within a one-mile radius of the EEPP project site was conducted in 2001. The one-mile radius was sufficient to include the project site, transmission line, laydown area, and natural gas line. Information was obtained from the South Coast Information Center and the San Diego Museum of Man. Results yielded the presence of two historic structures and nine pre-historic deposits. Despite the close proximity of these resources, they were determined to be outside of the project Area of Potential Effect (APE); consequently, the EEPP project was determined by the CEC to not result in any adverse effects to cultural resources.

Due to the lack of any significant cultural resources within the project APE, it was the assessment of the CEC staff that no cultural resources would be adversely affected by any construction approved for the peaker project. For that reason, the CEC determined that standard condition for certification **CUL-1** would apply to any construction associated with the EEPP project.

5.7.2 Environmental Analyses

The Applicant arranged for a current cultural resources investigation to be performed for the Enterprise BESS Project. The 2023 and supplemental 2024/2025 analyses performed by Rincon Consultants followed Title 20, CCR, Appendix B guidelines, and include a general description of the proposed site and related facilities, maps of the proposed Project area and related facilities, cultural resources records search, archival research, Sacred Lands File (SLF) search, field survey, desktop historical built environment analysis, and recommendations. The Cultural Resources

Technical Report (Appendix E) contains sensitive and confidential information concerning archaeological resources which has been removed in the version for public distribution. Archaeological site locations are exempt from the California Public Records Act, as specified in Government Code 7927.005, and from the Freedom of Information Act (Exemption 3), under the legal authority of both the National Historic Preservation Act (PL 102-574, Section 304[a]) and the Archaeological Resources Protection Act (PL 96-95, Section 9[a]). Sections of the report contain locational maps and other sensitive information. Distribution should be restricted appropriately. A copy of the complete Confidential Cultural Resources Technical Report has been provided to the CEC.

The cultural resources records searches performed by Rincon in 2023 and 2025 for the Enterprise BESS Project identified 87 previous cultural resources studies and 58 previously recorded cultural resources within the 1-mile records search radius. None of the cultural resources were located within or adjacent to the Project Area. A review of historical aerial photographs and assessor data indicates that a majority of the proposed Project area has been subject to ground disturbances including land clearing, plowing, and tilling, as well as development of adjacent land and construction of roads since the 1950s. Soils in the Project area have been previously disturbed as a result of previous grading activities associated with the construction of the existing EEPP facility and the auto body and related historical uses of the northern parcels site area. In addition, soils in the general Project area have been disturbed associated with construction of the adjacent commercial and industrial buildings, access roads, and electrical utility facilities and rights-of way. The pedestrian survey conducted by Rincon in 2023 and 2024 for the Project identified no cultural resources within the Project area. Due to the disturbed nature of the Project area and the non-alluvial soils, there is a low risk of encountering subsurface archaeological deposits.

A review of the Built Environment Resource Directory for San Diego County did not identify any properties within 1 mile of the Project Area which are designated in the National Register of Historic Places (NRHP) or the California Register of Historic Resources (CRHR). A review of the NRHP/CRHR and other local historical databases was negative for listings within the 1-mile search radius of the Project Area. The fieldwork and background research conducted for the Project resulted in the identification of one historic-age property in the Project Area, 2361 Auto Park Way , which is the location of the proposed Enterprise BESS facilities. The property was recorded and evaluated for the NRHP, CRHR, and local listing eligibility on DPR Series 523 forms, which are included in Appendix E. The property is recommended not eligible for federal, state, and local designation due to a lack of historic significance or architectural merit. The 2361 Auto Park Way property is not considered a historical resource under the CRHR; therefore, the project would result in no impact to historical resources pursuant to CRHR criteria. Refer to the Cultural Resources Technical Report in Appendix E for more information.

Condition of Certification (CUL-1) for the original certification is considered sufficient for the proposed supplemental amendment as well. The applicant has committed to compliance with the requirements of CEC Condition CUL-1, as follows:

CUL-1*: The Project certified under this emergency process shall not cause any significant impact to any cultural resources. No on-site cultural resource monitoring is required for this Project. In the event of an inadvertent cultural discovery the following mitigation measure must be followed:*

- *All work within 100 feet of the suspected cultural material must halt and a qualified Cultural Resource Specialist will be contacted immediately to evaluate the significance of the find. The Project Manager, Construction Manager, and the Compliance Project Manager will be notified if the resource is judged to be potentially significant, and the archaeologist may recommend further study.*
- *In the event that suspected human remains are encountered, work must stop immediately within a radius of 100 feet (30 meters) of the discovery, and the San Diego County Coroner's Office will be notified within 24 hours of the find. If the skeletal remains are determined to be prehistoric, the Coroner's Office will contact the Native American Heritage Commission (NAHC) to identify the Most Likely Descendants (MLD). The MLD will be notified and will determine the most appropriate disposition of the remains and any associated artifacts.*

5.7.3 Mitigation Measures

The Enterprise BESS Project will not create a significant impact to cultural resources that will require additional mitigation measures.

5.7.4 Consistency with LORS

The Enterprise BESS Project conforms to applicable LORS related to cultural resources.

5.7.5 Conditions of Certification

No changes to the original CEC Condition (CoC CUL-1) are required to protect potentially present sensitive cultural resources.

5.7.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____. 2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

5.8 Paleontological Resources

5.8.1 CEC Certification of EEPP

The CEC Final Decision (CEC 2001a,b) included a summary assessment of paleontological resource related issues associated with the EEPP. A summary of pertinent information from the Commission Decision in 2001 follows. The 2.94-acre EEPP project site is located in an area defined by rolling hills (9-15 percent grade), underlain by granitic rocks. The EEPP project would result in heavy disturbance to the soil mantle on the project site. The site pad had been previously cut down to a maximum of approximately 20 feet. The applicant proposed the installation of reinforced mat foundations for equipment, which were to be 1-4 feet deep. The proposal also included the installation of an 11.5 foot deep control room basement. The EEPP transmission line and laydown areas, however, were not expected to greatly impact the soil mantle.

The CEC Final Decision noted that no paleontological field survey had been conducted for the APE associated with the EEPP project. In 2001, CEC staff conducted an independent review of geologic mapping available for the neighborhood of the site. Of the available published geologic maps, neither the map of Merriam (1954), nor the map of Kennedy and Peterson (1975), covered the area of the site. A third geologic map (ERC 1989), published in the Draft General Plan of the City of Escondido, was submitted for review by the Applicant. This map showed that the site would be developed at a place where granitic rocks, which have null paleontological potential, are in contact with Jurassic or Triassic marine sedimentary or metasedimentary rocks in which fossils are rare, but potentially significant. CEC staff also inspected the aerial photograph of the proposed project site provided by the Applicant. This photograph showed that the site is at the base of a graded cut slope, on either a cut pad (in which case the soil mantle has been removed) or an artificial-fill pad (in which case the underlying soils have null paleontological potential). On May 14, 2001 CEC staff performed a site visit, and upon inspection, concluded that the pad was most likely underlain by artificial fill.

Based on the geology of the area, and on the aerial photograph inspected, CEC staff concluded in 2001 that the EEPP project was not likely to impact paleontological resources. The CEC concluded that compliance with standard Condition of Certification PALEO-1 would ensure that no paleontological resources would be adversely impacted from construction of the EEPP project.

5.8.2 Environmental Analyses

The proposed Enterprise BESS facilities are located primarily on the northern portion of the EEPP property and on the adjacent three parcels to the north that are located south of Auto Park Way. The Enterprise BESS Project site areas have all been previously disturbed. Construction of the proposed Enterprise BESS Project will require grading and excavation for site levelling, drainage control, and foundations on the BESS site, gen-tie cable tray, and switchyard areas. The maximum excavation depth is estimated at approximately 18 feet in the southern portion of the northern

parcels area site where a retention wall will be installed at the base of the cut slope associated with removal of a portion of the existing hillside which is expected to be underlain by granitic rock pending the results of a site-specific geotechnical report. The installation of underground utilities are expected to require excavations and/or foundations as deep as approximately 7 feet.

The Enterprise BESS Project construction location and subsurface disturbance depths are similar to the EEPP project. Based on the geology of the area, CEC staff concluded in 2001 that the EEPP project was not likely to impact paleontological resources. Similarly, with implementation of CEC standard Condition of Certification PALEO-1, it is expected that no paleontological resources would be adversely impacted from construction of the EEPP project.

In summary, no adverse impacts to paleontological resources associated with construction or operation of the Enterprise BESS Project are expected to occur.

5.8.3 Mitigation Measures

The Enterprise BESS Project will not result in significant impacts related to paleontological resources that will require additional mitigation measures.

5.8.4 Consistency with LORS

The project conforms to applicable LORS related to geological and paleontological resources.

5.8.5 Conditions of Certification

The proposed modifications do not require changes to the following CoC for paleontological resources as stipulated in the CEC Final Decision for the EEPP and that are applicable to the Enterprise BESS Project as well:

PALEO-1: *The project certified under this emergency process shall not cause any significant impact to paleontological resources on the power plant site or linear rights of way.*

Verification*: Throughout construction, the project owner shall inform the CPM concerning any substantive activity related to item 1.*

In summary, the Enterprise BESS Project will not result in significant impacts related to paleontological resources that will require additional CoCs.

5.8.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____. 2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

ERC (Environmental and Energy Services Co.), 1989, Geologic map of the City of Escondido: Draft Environmental Impact Report of the Draft General Plan of the City of Escondido. Figure II-9 of the Draft EIR – scale 1:63,000.

Kennedy, M.P., Peterson, G.L., 1975, Geology of the San Diego metropolitan area, California: California Division of Mines and Geology, Bulletin 200. Includes geologic maps of the Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7.5' quadrangles - scale 1:24,000.

Merriam, R., 1954, A typical portion of the Southern California batholith, San Diego County: in Jahns, R. (ed.), Geology of Southern California: California Division of Mines, Bulletin 170, vol. 2, Map Sheet 22 – Scale 1:63,360.

5.9 Noise and Vibration

5.9.1 CEC Certification of EEPP

The CEC Final Decision (CEC 2001a,b) included a summary assessment of noise impact related issues associated with the EEPP. Concerns listed were related to construction and operational noise impacts at the property line and nearest sensitive receptors consisting of residential uses approximately 1200 feet to the northwest of the facility on Ross Drive at the time of the assessment in 2001. As stated in the CEC Staff Assessment (CEC 2001b), the City ordinance limits noise levels over a 24-hour period to 45 decibels (dB) at residential properties. The Ross Drive residential area is in an unincorporated area of San Diego County, therefore, is subject to County Noise Ordinances. In 2001, the County noise standard at a residential property line was 45 dB. The proposed EEPP project was estimated to generate a maximum noise level of 70 dB at the project property lines. In 2001, this noise level was consistent with the City and County 70 dB standard at the industrial facility property line. Adjacent undeveloped land and developed industrial facilities would be subject to construction noise. The CEC Final Decision stated that these uses would not be affected by the EEPP construction noise because they are not noise sensitive. Furthermore, the noise would be temporary, and would only occur during the day.

Energy Commission staff concluded that the standard Noise Conditions of Certification would adequately address potential noise impacts and concerns and that no additional Conditions of Certification were required for the EEPP.

The footprint for the Enterprise BESS Project now includes the northern portion of the EEPP parcel as well as the three parcels to the north adjacent to the south side of Auto Park Way. As such, the nearest sensitive receivers include residential communities located approximately 0.5 mile northeast and 0.2 mile northwest of the Project Area boundary, the Arch Health Medical Group facility (located approximately 1,060 feet southwest of the Project Area boundary), the Palomar Medical Center Escondido (located approximately 950 feet west of the Project Area boundary), and the Rady Children's Urgent Care Escondido (located approximately 1,650 feet

from the Project Area boundary). While not typically considered a sensitive use, the adjacent industrial building located east of the northern Project Area south of Auto Park Way was also included as a sensitive receiver due to its close proximity to the proposed vibration-generating construction activities associated with the Project and the potential to exceed applicable vibration thresholds.

5.9.2 Environmental Analyses

The proposed Enterprise BESS Project will result in temporary noise impacts during the construction phase as well as a minor increase in noise levels at the Project site during the operational phase associated with BESS electrical equipment operation and maintenance activities. In order to assess potential Enterprise BESS Project noise impacts, a combination of short-term and long-term ambient noise monitoring was conducted at the site and the closest residential area on June 1-2, 2023. The ambient noise monitoring data was used for modeling Project construction and operational noise levels and comparing the results to applicable noise and vibration impact significance thresholds. The assessment is documented in the Noise and Vibration Study presented in Appendix F.

In summary, without mitigation construction and operation of the Enterprise BESS Project would result in significant noise and vibration impacts as summarized below in Table 5.9-1. With implementation of applicant-committed mitigation measures, impacts would be less than significant. Refer to the noise and vibration assessment in Appendix F for more information.

Table 5.9-1 Summary of Noise and Vibration Impact Findings

Issue	Proposed Project's Level of Significance	Applicable Recommendations
Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than significant impact with mitigation (Construction) Less than significant impact with mitigation (Operation)	Mitigation Measure NOISE-5 Mitigation Measure NOISE-6
Would the project result in the exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	Less than significant impact with mitigation (Construction) Less than significant impact (Operation)	Mitigation Measure NOISE-7 None
For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No impact	None

5.9.3 Mitigation Measures

Without the proposed avoidance and mitigation measures, the Enterprise BESS Project could create significant noise and vibration impacts. Prior to and during the construction period, the existing CEC Noise Conditions of Certification NOISE-1, NOISE-2, NOISE-3, and NOISE-4 shall be implemented. In addition, the following recommended mitigation Noise Conditions are proposed by the applicant to reduce potential significant localized noise impacts during the construction phase. With implementation of these measures in addition to the four existing CEC Noise Conditions, impacts would be less than significant.

Recommended Condition NOISE-5: *Construction Noise Reduction Measures*

***NOISE-5**: The Project Owner shall ensure that noise control measures described in this Condition are implemented to reduce construction noise impacts to the extent feasible.*

Verification:

- All construction equipment, stationary and mobile, shall be equipped with properly operating and maintained mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features that meet or exceed original factory specifications.
- Construction equipment shall be equipped with shrouds and noise-control features that are supplied as standard accessories from the original equipment manufacturer.
- Routine field inspection of mufflers to ensure proper function shall be performed by the construction manager.
- Locate stationary noise-generating equipment such as portable power generators as far as possible from sensitive receptors.

Recommended Condition NOISE-6: *Operational Noise Reduction Measure*

***NOISE-6:** In order to reduce operational noise levels associated with the Project to below the City's required limit of 70 dBA Leq along the Project boundary, a noise barrier with a minimum height of 8 feet shall be installed along the eastern Project boundary.*

***Verification:** The noise barrier shall be constructed of a solid material with no gaps or openings. Suitable barrier materials may include one or more of the following: masonry block, concrete panels, 0.125-inch-thick steel sheets, 1.5-inch wood fencing, or 0.25-inch glass panels. If wood is used as the primary barrier material, the fence boards shall overlap or be of "tongue and groove" construction with a joining compound between the boards to ensure there would be no gaps or holes in the barrier, and annual inspection and maintenance shall be conducted for the life of the Project to ensure the barrier continues to perform to the minimum requirements.*

Recommended Condition NOISE-7: Prepare and Implement a Vibration Control Plan During Construction

NOISE-7*: The Vibration Control Plan shall be prepared by a qualified acoustical consultant or engineer and shall include methods required to minimize vibration during construction.*

Verification:

- Use of alternative construction equipment for pile driving activities (e.g., use of a sonic, oscillating, or rotating pile driver in lieu of an impact pile driver) occurring within 33 feet of off-site buildings to reduce vibration impacts to these structures
- Vibration monitoring prior to and during pile driving activities occurring within 33 feet of off-site buildings
- Avoiding the use of vibrating equipment when allowed by best engineering practices

The Vibration Control Plan shall include a preconstruction survey letter establishing baseline conditions at nearby buildings where potential impacts cannot be avoided using alternative equipment and construction techniques. The survey letter shall determine conditions that exist prior to the commencement of construction activities for use in evaluating potential damages caused by construction. Fixtures and finishes susceptible to damage shall be documented photographically and in writing prior to construction. The survey letter shall provide a shoring design to protect such buildings and structures from potential damage. At the conclusion of vibration-causing activities, the qualified acoustical consultant or engineer shall issue a follow-up letter describing damage, if any, to impacted buildings and structures.

5.9.4 Consistency with LORS

The project conforms to applicable laws related to noise and vibration.

5.9.5 Conditions of Certification

The proposed Enterprise BESS Project does not require changes to CEC CoCs NOISE-1 through NOISE-4 for noise and vibration. An assessment of the applicability of the existing EEPP Noise CoCs for the Enterprise BESS Project follow.

NOISE-1: *The project permitted under this emergency process shall be required to comply with applicable community noise standards.*

Verification: *Within 30 days of the project first achieving a sustained output of 80 percent or greater of rated capacity, the project owner shall conduct a 25-hour community noise survey, utilizing the same monitoring sites employed in the pre-project ambient noise survey as a minimum. No single piece of equipment shall be allowed to stand out as a source of noise that draws legitimate complaints. Steam relief valves shall be adequately muffled to preclude noise*

that draws legitimate complaints. If the results from the survey indicate that the project noise levels at the closest sensitive receptor are in excess of 62.5 dBA from 7:00 a.m. to 7:00 p.m., 60 dB from 7:00 p.m. to 10:00 p.m., and 57.5 dB from 10:00 p.m. to 7:00 a.m., or above 75 dBA at the project site property lines additional mitigation measures shall be implemented to reduce noise to a level of compliance with this limit.

The Project will comply with applicable community noise standards. No loud noise sources are associated with the operation of the Enterprise BESS Project. Once the Project is operational, the Applicant will conduct a 25-hour community noise survey as required by CoC NOISE-1.

***NOISE-2**: Prior to the start of rough grading, the project owner shall notify all residents within one mile of the site of the start of construction and will provide a complaint resolution process.*

The Project will comply with CoC NOISE-2.

***NOISE-3**: Throughout the construction and operation of the project, the project owner shall document, investigate, evaluate, and attempt to resolve all project related noise complaints.*

The Project will comply with CoC NOISE-3.

***NOISE-4:** Night construction activities may be authorized by the CPM if they are consistent with local noise ordinances. Night construction, or specific night construction activities may be disallowed by the CPM if it results in significant impact to the surrounding community.*

The Project will comply with CoC NOISE-4, as applicable. No night construction activities are currently planned as part of the proposed Enterprise BESS Project.

In addition, the Enterprise BESS Project will comply with three additional applicant-committed mitigation measures that are assumed to be adopted by the Commission as Conditions NOISE -5, NOISE-6, and NOISE-7 as itemized in Section 5.9.3, Mitigation Measures. The Enterprise BESS Project will comply with these measures.

In summary, with mitigation the Enterprise BESS Project would not result in significant impacts related to noise or vibration. Refer to the noise and vibration assessment in Appendix F for more information.

5.9.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____. 2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

5.10 Land Use

5.10.1 CEC Certification of EEPP

This Supplemental Petition provides updates to the land use information as described in the Commission Decision and subsequent Commission Orders.

At the time the EEPP was licensed by the CEC in 2001, CalPeak's 2.95-acre site was vacant (CEC 2001a). The EEPP project site had been graded, but was otherwise unimproved. The EEPP project site is within the western portion of Escondido and was designated General Industrial (P/1) by the General Plan, with a Zoning designation of Light Industrial (M-1). As discussed in the CEC Final Decision, the peaker project was determined consistent with the General Plan Land Use Designation (P/1) and Zoning designation (M-1) for the site. As of 2001, the properties east and north of the EEPP site consisted of commercial/light industrial operations, beyond which additional commercial/light industrial operations were located along Vineyard Avenue. This description is still accurate, with the exception that Vineyard Avenue has been renamed Auto Park Way by the City. As of 2001, the southern site boundary abutted a large area of vacant land and abandoned orchards. As in 2001, the western site boundary currently still abuts open land, upon which is located a 200-foot-wide SDG&E transmission line easement, running north and south, with elevated transmission lines. Beyond the easement is more open land. The CEC Final Decision determined that the EEPP project would be consistent with the surrounding existing land uses, as the area was devoted to industrial and commercial purposes. Since the EEPP was licensed in 2001, Citracado Parkway and the Palomar Medical Center have been built to the west. In addition, the vacant land that was located south of the EEPP site in 2001 is now occupied by the SDG&E Palomar Energy Center and Substation.

At the time of CEC licensing in 2001, the City of Escondido recommended that several requirements pertaining to land use and general construction requirements be incorporated in the Commission Decision. The CEC Staff Assessment (CEC 2001b) noted that the Energy Commission has authority for permitting and monitoring construction and operation of power plants and related facilities. Proper implementation and monitoring of all conditions of approval is the responsibility of the assigned Energy Commission compliance project manager, who makes every effort to coordinate with local jurisdictions regarding construction and operation of power plants. The Staff Assessment notes that Standard Condition of Certification LAND-1 would ensure that the EEPP project will be in compliance with all applicable laws, ordinances, regulations, and standards (LORS). As discussed in the CEC Final Decision, other Conditions of Certification were tailored to address specific concerns raised by the City of Escondido. Conditions GEN-1 and GEN-2 require compliance with the California Building Code and submission of designs, calculations and specifications. Condition LAND-2 requires plan approval for driveways, and Condition TRANS-5 relates to paving requirements. Condition PUB SER-2 addresses fire hydrants and fire equipment access. Painting and lighting requirements are covered in Conditions VIS-1 and VIS-2. The concerns raised by the City of Escondido and several residents relating to shielding the EEPP

project by use of berms, vegetation, trees and fencing is addressed in Condition VIS-3. Modifications to the original landscaping plan were made to meet these concerns.

5.10.2 Environmental Analyses

The proposed Enterprise BESS Project site is located on the northern portion of the existing EEPP facility property and on the three northern parcels adjacent to the south side of Auto Park Way in the City of Escondido. Local land use laws, ordinances, regulations, and standards (LORS) that are potentially applicable to the proposed project are contained in City of Escondido's 2012 General Plan (as amended) (City of Escondido 2012), and the City's Municipal Code, Chapter 33 Zoning, Article 55 Grading and Erosion Control.

CEC Condition LAND-1 required that the EEPP project permitted by the Energy Commission would conform to all applicable local, state and federal land use requirements, including general plan policies, zoning regulations, local development standards, easement requirements, encroachment permits, truck and vehicle circulation plan requirements, Federal Aviation Administration approval, and the Federal Emergency Management Agency National Flood Insurance Program. Verification requirements for Condition LAND-1 state that prior to start of construction, the project owner will submit to the CPM documentation verifying compliance with the referenced land use requirements. It is assumed that CEC Condition LAND-1 will also be applicable to the Enterprise BESS Project.

As discussed in Section 5.4 and Appendix D (Biological Resources), the proposed Enterprise BESS Project may include the removal of several landscaping trees (mature Canary Pines) associated with installation of the 13.8 kV gen-tie on an elevated cable tray on the northern portion of the EEPP parcel. The Canary Pines were stipulated by the CEC in 2001 to screen the peaker facilities from offsite viewing locations and to meet City of Escondido landscape plan requirements. Depending on the final alignment and foundation design, installation of the 13.8 kV gen-tie cable tray over the hill between the EEPP and the BESS facilities on the northern parcels may require removal of up to five Canary Pine trees that were previously stipulated as part of the landscape plan for the EEPP. In addition, the proposed development of the northern parcels area for the installation of BESS facilities will require demolition of the existing auto body repair business related structures as well as the associated landscaping including three palm trees. Mitigation for the removed trees on the EEPP and northern parcels site areas is discussed in Section 5.4 and Appendix D. The removal of the trees would typically require permits from the City of Escondido were the CEC not the Lead Agency. The CEC's approval of the EEPP project generally required compliance with local LORS subject to the CEC's discretion. Mitigation strategies will consider City of Escondido Industrial Development Standards and site zoning of M-1 (see Escondido Municipal Code, Chapter 33 Zoning, Article 26 – Industrial Zones, Section 33-569 – Development Standards, Table 33-569, Industrial Development Standards).

The City of Escondido Municipal Code contains information regarding requirements for removing vegetation (trees and shrubs). The applicable City of Escondido Municipal Code, Article 55, Grading and Erosion Control sections include the following:

- Sec.33-1068.A. Clearing of land and vegetation protection
- Sec.33-1068.B. Restrictions on removal of vegetation
- Sec.33-1069. Vegetation protection and replacement standards

On October 9, 2024, the Escondido City Council voted to approve an Interim Ordinance prohibiting the City from issuing any use permit, variance, building permit, business license, or any other entitlement for use shall be approved or issued for the establishment, construction, or operation of a commercial BESS facility for any location or property within the City of Escondido. On October 20, 2024, the City of Escondido extended their current moratorium on the issuance of any City entitlements for use for new battery energy storage systems through the close of business on October 5, 2025. (Escondido Ordinance No. 2024-14R.) At the end of the moratorium, there is no statutory requirement that the local government act, or refuse to act, in any specified manner. Consequently, it is important to note that the moratorium itself is not a substantive local land use ordinance; it is a statutory process which may or may not result in a later enactment. Moreover, as a matter of law, the CEC's exclusive jurisdiction pursuant to Public Resources Code Section 25500 et seq. cannot be preempted by local ordinance, and the Commission retains all of its legal authorities under the Public Resources Code.

CEC Condition LAND-1 would ensure that all applicable laws, ordinances, regulations and standards (LORS) would be met and that the project's impact on land use would be less than significant.

In summary, no adverse impacts related to land use compliance and consistency associated with construction or operation of the Enterprise BESS Project would occur.

5.10.3 Mitigation Measures

The Enterprise BESS project will not result in significant impacts related to land use that will require additional mitigation measures.

5.10.4 Consistency with LORS

The Project conforms to applicable LORS related to land use.

5.10.5 Conditions of Certification

The proposed modifications do not require changes to the following CoCs for land use:

LAND–1: *The project permitted under this emergency process will conform to all applicable local, state and federal land use requirements, including general plan policies, zoning regulations, local development standards, easement requirements, encroachment permits, truck and vehicle circulation plan requirements, Federal Aviation Administration approval, and the Federal Emergency Management Agency National Flood Insurance Program.*

Verification: Prior to start of construction, the project owner will submit to the CPM documentation verifying compliance with the above referenced land use requirements.

LAND-2: *Detailed plans for all driveways shall be submitted to the City of Escondido Public Works Department for review and comment and to the CPM for review and approval prior to construction of the entryway.*

Verification: The CPM shall review the entryway plans to ensure that City concerns have been addressed and shall inspect the constructed driveways to ensure that they are constructed to City driveway standards.

The Enterprise BESS Project will comply with Conditions LAND-1 and LAND-2 as applicable.

5.10.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6., 2001

____. 2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

City of Escondido, 2012. City of Escondido 2012 General Plan. As amended.

5.11 Traffic and Transportation

5.11.1 CEC Certification of EEPP

The CEC Staff Assessment (CEC 2001b) included a summary assessment of traffic and transportation related issues associated with the EEPP. The EEPP project site is accessed from State Route 78 (SR 78) to southbound Nordahl Road, then east on Auto Park Way (previously Vineyard Avenue), and south on Enterprise Street. The CEC Staff Assessment noted that the applicant proposed to avoid peak-hour traffic on Auto Park Way by using Mission Street as an alternative during the peak-hour. The EEPP project was expected to generate a maximum of 154 trips per day, including construction workers, materials, and equipment delivery during construction. During operation, the EEPP project is unmanned, with operational traffic generated on an intermittent basis for routine maintenance. The EEPP operational traffic was not expected to be substantial and would not exceed the maximum construction trip generation of 154 trips

per day on an intermittent basis for periodic maintenance. The CEC Staff Assessment also presented information related to the traffic volumes and capacities on area roadways that would be expected to provide access for the EEPP. According to the 2001 CEC Staff Assessment, the data indicated that there was sufficient capacity for both construction and operation traffic on all roadways that would be used to access the EEPP site.

The CEC Staff Assessment noted that there are regulations relating to the size and weight of vehicles using state and city roadways. These regulations are in place to protect public safety and to minimize damage to area roads from large, heavy loads. Compliance with CEC Condition TRANS-1 ensured that the project complies with the weight and size requirements of relevant jurisdictions.

Transportation of hazardous materials to the site including aqueous ammonia was assessed to be in compliance with California Highway Patrol and Caltrans requirements. TRANS-3 required the applicant to obtain the necessary permits and licenses for transportation of these hazardous materials.

The City of Escondido recommended that the following requirement be incorporated into the Commission Decision: “All private driveways and parking areas shall be paved with a minimum of 3” (Asphaltic Concrete) AC over 6” of Aggregate Base (AB) or 5 1/2” Portland Cement Concrete (PCC) over 6” AB. All paved areas exceeding 15 percent slope or less than 1.0 percent shall be paved with PCC.” Energy Commission staff took note of this comment and concluded that this condition should be added as Condition of Certification TRANS-5 for the EEPP.

As discussed in Section 5.11.2, below, the construction traffic associated with the Enterprise BESS Project would be less than that required for the EEPP when it was constructed.

5.11.2 Environmental Analyses

The proposed Enterprise BESS project as currently envisioned would involve a peak construction workforce of 50 workers and involve up to a peak of about 35 truck deliveries per day. The facility would be unmanned during normal operations and truck traffic during operations would be limited primarily to maintenance activities. It is expected that the Enterprise BESS Project would comply with applicable Caltrans and California Vehicle Code requirements.

As was the case for the EEPP, with implementation of the CEC CoCs for traffic and transportation, it is expected that the peaker project’s impact on traffic and transportation would be less than significant.

5.11.2.1 Vehicle Miles Traveled Assessment Findings

This Supplemental Petition for Post Certification Amendment for the Enterprise BESS Project includes a Vehicle Miles Traveled (VMT) assessment. This assessment was not required at the

time the EEPP was licensed in 2001. The VMT assessment is presented in Appendix G and the findings are summarized below.

The discussion of VMT screening thresholds presented herein is consistent with City of Escondido requirements, although the City of Escondido does not have lead agency jurisdiction for the project given the CEC's jurisdiction.

Construction of the project is expected to have a peak daily workforce of up to 50 daily construction workers. In addition, construction of the project is expected to generate a peak of 35 truck trips per day to facilitate incoming deliveries and offsite disposal of excavated soil and rock material and construction waste. Overall, the project is expected to generate a maximum of 85 round trips per day during the construction phase. The estimated number of construction-phase trips is based on the planned work activities, construction schedule, and applicant experience on similar projects. After construction is complete, the project would function as an unmanned facility that is controlled remotely from an off-site location. No daily operational trips would typically be generated by the project. However, required maintenance of the BESS Project would be expected to require two maintenance workers to visit the site one day per week on average, resulting in approximately two round trips per week during the operational lifespan of the project.

The Enterprise BESS Project can be categorized as a public utility with passive use. With consideration of the low operational phase workforce, the Enterprise BESS Project qualifies for a streamlined transportation analysis without being subject to the detailed transportation VMT analysis requirements under the City of Escondido's "Locally Serving Public Facility" screening criteria.

In conclusion, the Enterprise BESS project would screen out of the requirement to prepare a detailed transportation VMT analysis based under the City of Escondido's "Locally Serving Public Facility" screening criteria, as identified in the City of Escondido's "Escondido Transportation Impact Analysis Guidelines" (2021). Therefore, the project would have a less than significant VMT impact.

5.11.3 Mitigation Measures

The Enterprise BESS Project will not result in a significant impact related to traffic and transportation and will not require additional mitigation measures.

5.11.4 Consistency with LORS

The project conforms to applicable laws related to traffic and transportation.

5.11.5 Conditions of Certification

The proposed Enterprise BESS Project does not require additions to the CoCs for traffic and transportation. An assessment of the applicability of the existing EEPP Traffic and Transportation CoCs for the Enterprise BESS Project follows.

TRANS-1: *The project permitted under this emergency process shall comply with Caltrans and City/County limitations on vehicle sizes and weights. In addition, the project owner or its contractor shall obtain necessary transportation permits from Caltrans and all relevant jurisdictions for roadway use.*

The Project will comply with CoC TRANS-1.

TRANS-2: *The project permitted under this emergency process shall comply with Caltrans and City/County limitation for encroachment into public rights-of- way and shall obtain necessary encroachment permits from Caltrans and all relevant jurisdictions.*

The Project will comply with CoC TRANS-2.

TRANS-3: *The project permitted under this emergency process shall ensure that permits and/or licenses are secured from the California Highway Patrol and Caltrans for the transport of hazardous materials.*

The Project will comply with CoC TRANS-3.

TRANS-4: *Following completion of construction of the power plant and all related linear facilities, the project owner shall return all roadways to original or as near original condition as possible.*

The Project will comply with CoC TRANS-4 as related specifically to the Enterprise BESS Project.

TRANS-5: *Driveways and parking areas shall be paved with a minimum of 3" AC over 6" of AB or 5 1/2" PCC over 6" AB. All paved areas exceeding 15% slope or less than 1.0% shall be paved with PCC.*

The Project will comply with CoC TRANS-5 as related specifically to the Enterprise BESS Project.

5.11.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____. 2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

Escondido, City of. 2021. Escondido: Transportation Impact Analysis Guidelines. https://www.escondido.org/Data/Sites/1/media/Engineering/TIACRAIG/EscondidoTransportationImpactAnalysisGuidelines2021.pdf (accessed May 2023).

State Office of Planning and Research (OPR). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

5.12 Visual Resources

5.12.1 CEC Certification of EEPP

The CEC Staff Assessment (CEC 2001b) included a summary assessment of visual resources related issues associated with the EEPP. Pertinent information from the 2001 Staff Assessment for the EEPP is presented here as it relates to the proposed Enterprise BESS Project.

As assessed in 2001, the project area contained rolling hills that were vegetated with grasses, shrubs and occasional landscape trees. The project site had been graded and was relatively flat, except for manufactured slopes at the north and south end of the site. A small hill was located south of the project site and the area terrain sloped downward towards the north and east, and gently upward towards the west.

As of 2001, development of industrial facilities had occurred to the north and east of the project site. On the western project boundary, there was an SDG&E electrical transmission corridor with two rows of steel lattice transmission lines and two rows of wooden distribution lines. In general, the industrial uses in this area were characterized as having a neat well-kept appearance.

The 2001 CEC Staff Assessment noted that the proposed EEPP project would introduce an industrial structure onto the site with heights ranging from 30-feet to 50-feet tall. This includes an exhaust stack that is 50-feet tall and a “dead end” tower that is approximately 47-feet tall. A landscaped 10-foot high earthen berm was proposed on the western boundary, and along the top of the existing manufactured slope on the north end of the project site. In addition, the manufactured slope on the south side of the entrance would be landscaped with tree screening for approximately 200 feet, beginning at the entryway. Approximately 80 feet of landscaping was proposed on the north side of the driveway, beginning at the entrance. The manufactured slope on the south side of the site would not be landscaped, except for the entryway landscaping described above. The proposed landscape plan included screening of all outdoor storage areas and an irrigation system to maintain landscaping. The application stated that all landscaping would be maintained in a weed and debris free condition. The application also stated that the project would comply with City landscaping requirements.

As of 2001, the site could be viewed from the houses in the long range across the valley to the north from approximately three miles and from Auto Park Way (previously Vineyard Avenue) near the site. Auto Park Way views were estimated to be 30 feet lower than the EEPP project

site. These northern views of the site included views of the northern and northwestern portions of the site. A hill and ridge protrude from the south toward the north along the western edge of the transmission right-of-way adjacent to the site. The ridge ranges from an estimated 30 feet higher than the site at the southern part of the site to an estimated 15 feet approximately three quarters (3/4) of the distance up the western project property line. This ridge blocks any existing views of the site to the west and much of the views of the western portion of the site from Auto Park Way to the northwest. Highway 78 travelers have limited intermittent views of the site in the distance, due to partial screening by structures and vegetation. There are no existing views from the south of the site, as that area is an undeveloped hilltop that obscures any views from the south. There are extremely limited views of the site from the east because existing topography and landscaping obscure any views from that direction.

The 2001 CEC Staff Assessment determined that the berm and landscaping proposed by the applicant as part of the EEPP project on the western and northern project boundaries would be sufficient to ensure that views of the site from the north and west were screened from currently available views as of 2001. In addition, the CEC Staff Assessment noted that Condition **VIS-1** required all portions of the structure visible to the public to be painted in a neutral color in order to reduce the visual impacts of any visible portions of the project. Any lighting proposed by the applicant could increase nighttime glare but **VIS-2** would address this problem. An adjacent property developer and the City of Escondido requested that the EEPP project should provide screening to reduce the impact of views from the proposed industrial park to the west and north. This screening would consist of a 10-foot-high berm and landscaping including trees on the entire western and northern project boundaries. The applicant agreed to include the berm and provide a detailed landscape plan.

The City of Escondido had recommended that several additional requirements be incorporated in the Commission Decision. The City's requests included that per the City's Tree Preservation Ordinance, a protected tree (any oak which has a ten inch or greater diameter breast height) which is removed, shall be replaced at a minimum 2:1 ratio with minimum 24"-box sized trees. The complete list of the City's requests are documented in the 2001 CEC Staff Assessment (CEC 2001b). Energy Commission staff took note of these comments and concluded that the standard Land Use Conditions of Certification (LAND-1) requiring compliance with applicable LORS adequately addressed the City's concerns.

5.12.2 Environmental Analyses

The viewshed in 2025 in the vicinity of the EEPP site is similar to that described above from the 2001 CEC Staff Assessment with the following exceptions. Landscaping trees (Canary Island pines) have been planted in accordance with the 2001 landscaping plan for the EEPP and are now present and mature on the northern and western EEPP property perimeters and effectively screen offsite views of the EEPP site from the north and northwest.

The existing EEPP and northern parcels sites are industrial in nature and both are appropriately zoned Light Industrial (M-1). Construction of the Enterprise BESS Project will require temporary construction equipment activity use which may create a short term and insignificant visual impact.

The Enterprise BESS Project as currently proposed includes development of BESS electrical interconnection related facilities on the northern portion of the EEPP site (see Figure 2 in the main body of this Petition). The electrical interconnection facilities include a 13.8 kV gen-tie on aboveground cable tray up to approximately 6 feet above ground surface and an associated elevated switchgear platform on the northern developed portion of the EEPP site up to about 11.5 feet above ground level. The Enterprise BESS facilities to be installed on the previously developed northern portion of the EEPP parcel will be effectively screened by the existing elevated berm and mature pine trees that surround the northern and northwestern portions of the EEPP site (see Exhibit 1).

The proposed 13.8 kV gen-tie cable tray installation may require removal of up to an estimated five mature Canary Pine trees and may slightly open up a narrow view of the taller EEPP facilities (e.g., stack) from the south. Given the number of trees present and the narrow width of the gen-tie disturbance zone (estimated at 10 feet wide including work areas on sides of cable tray), significant visual impacts are not expected to occur. The proposed Project includes planting of Canary pine trees on the EEPP site to compensate for the trees to be removed.

The Enterprise BESS Project as currently proposed also includes development of the 52 MWh BESS facilities on the three northern parcels area which encompasses approximately 0.82 acre south of Auto Park Way. The northern parcels site is currently developed with auto body repair related facilities that are larger than the proposed modular BESS facility enclosures that will be a maximum of approximately 10 feet tall. The overall BESS development will more fully cover the northern parcels site area than the existing auto body repair facilities, but will not be out of character for the existing commercial/industrial nature of the site area. The proposed Project includes the installation of landscaping along the Auto Park Way frontage. Refer to Exhibit 1 for a photo simulation of the proposed Enterprise BESS Project from several viewing locations. Exhibit 1 includes information on proposed BESS facility dimensions.

The Enterprise BESS facilities will not be visible in foreground views from any residences or other sensitive public viewing areas. Visual simulations of the BESS facilities from identified key viewing locations are presented in Exhibit 1.

In summary, no significant visual resource related impacts from implementation of the Enterprise BESS Project are expected.

5.12.3 Mitigation Measures

The Enterprise BESS Project will not create significant visual resource impacts that will require additional mitigation measures. The proposed Enterprise BESS Project includes landscaping along the Auto Park Way frontage as well as planting of Canary Island pine trees on the EEPP site to compensate for trees to be removed as part of the Project.

5.12.4 Consistency with LORS

The project is expected to conform to applicable laws related to visual resources.

5.12.5 Conditions of Certification

The proposed Enterprise BESS Project does not require additions to the CoCs for visual resources. An assessment of the applicability of the existing EEPP Visual Resource CoCs for the Enterprise BESS Project follows.

VIS-1: *Project structures treated during manufacture and all structures treated in the field, which are visible to the public, shall be painted in a neutral color consistent with the surrounding environment.*

Verification: *Prior to painting exposed services, the project owner shall identify the selected color for CPM approval.*

The Project will comply with CoC VIS-1. The BESS enclosures are manufactured and shipped in a standard, neutral gray color that is typical for electrical utility facilities.

VIS-2: *The project owner shall design and install all lighting such that light bulbs and reflectors are not visible from public viewing areas and illumination of the vicinity and the nighttime sky is minimized. Lighting must also be installed consistent with any local requirements.*

Verification: *The project owner shall inform the CPM of any complaints concerning lighting and when measures have been taken to correct the problem.*

The Project will comply with CoC VIS-2.

VIS-3: *The project owner shall prepare and submit to the City of Escondido for review and comment, and to the CPM for review and approval a landscaping plan that complies with City of Escondido Landscape Ordinance requirements which provides for any or all of the following, as appropriate, to screen the project from view: berms, vegetation and trees, and use of square tubular steel security fencing. Berms provided shall be ten (10) feet in height on the west and northern edges of the project site.*

Verification: *Within 30 days of certification, the project owner shall submit the landscaping plan to the local planning department and the CPM.*

The Project will comply with CoC VIS-2, as practical given site constraints. The landscaping plan required for the EEPP in 2001 was implemented and included the items required under Condition VIS-3. The Enterprise BESS Project will also comply with CoC VIS-3 related to the proposed landscaping and tree replacements.

In summary, the Enterprise BESS Project will not create significant visual resource impacts from sensitive public viewing locations and will not be out of character with the industrial nature of the industrially zoned properties and surrounding area.

5.12.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____.2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

5.13 Environmental Justice

5.13.1 CEC Certification of EEPP

The CEC Staff Assessment (CEC 2001b) included a summary assessment of environmental justice related issues for the EEPP project. The CEC staff reported in the Staff Assessment in 2001 that for all siting cases, including the emergency permitting process, Energy Commission staff follows the federal guidelines' two-step screening process. The process assesses:

- Whether the potentially affected community includes minority and/or low-income populations; and
- Whether the environmental impacts are likely to fall disproportionately on minority and/or low-income members of the community.

The CEC Staff Assessment (CEC 2001b) reported that for the Year 2000 estimates showed that the minority population within a three-mile radius of the EEPP project was growing steadily, but that this group was still less than 30 per cent of the total, and were dispersed through the surrounding census tracts. The two tracts with the greatest concentration were approximately 2.5 miles distant. The CEC Staff Assessment concluded that since the project would be screened for noise and visual disruption, and would be among the cleanest emitting facilities being built, no environmental justice issues were identified for the EEPP in 2001.

The only potential adverse effects of the EEPP project on this population would be air quality or public health impacts. Staff determined that the impacts from the EEPP project, with the implementation of staff's recommended conditions of certification, would not result in a significant adverse impact to the surrounding community. Staff determined that there were no environmental justice issues associated with the EEPP project.

The proposed Enterprise BESS Project would not involve routine air emissions, would comply with applicable noise standards, and would involve installation of facilities that would be of smaller scale than the existing peaker facilities.

5.13.2 Environmental Analyses

Construction and operation of the Enterprise BESS Project is not expected to result in any significant impacts to the environment, including air quality/greenhouse gas emissions or public health impacts. The Enterprise BESS Project would have minor emissions during the temporary construction phase and then only very minor emissions associated with the maintenance of the BESS facility. In addition, the Enterprise BESS Project is expected to reduce emissions from the EEPP when the batteries are providing power to the electrical grid in lieu of the peaker facility which is a beneficial project impact.

In summary, the Enterprise BESS Project is not expected to result in any adverse or significant impacts related to environmental justice issues and will have no disproportionately high or adverse impacts on any minority or low-income communities or disadvantaged communities.

5.13.3 Mitigation Measures

The Enterprise BESS Project will not result in a significant impact related to environmental justice considerations and will not require mitigation measures.

5.13.4 Consistency with LORS

The project conforms to applicable laws related to environmental justice.

5.13.5 Conditions of Certification

The proposed project does not require CoCs for environmental justice.

5.13.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____. 2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

5.14 Public Services/Fire Protection

5.14.1 CEC Certification of EEPP

The CEC Staff Assessment for the EEPP (CEC 2001b) included an assessment of issues related to public services and fire protection. The City of Escondido Fire Department provides fire protection as well as advanced and basic life support emergency medical service and transport for the project area. The nearest fire station is Fire Station #1 which is located less than three miles from the project site (310 N. Quince Street). As of 2001, this station provided a response time of less than seven minutes with a staff of fifteen and one duty chief. Fire Station #1 was rebuilt and upgraded in 2008/2009 to accommodate 1 paramedic fire engine, 1 truck company, 2 ambulances, and 1 battalion chief vehicle (City of Escondido 2024a). This amounts to 19 persons per shift. The City of Escondido had indicated that the City fire fighting facilities would be adequate to serve the proposed EEPP project in 2001.

The City of Escondido recommended that multiple fire safety and fire-fighting related requirements be incorporated into the Commission Decision in 2001 (CEC 2001b). Energy Commission staff took note of these comments and stated that the CEC is the ultimate approving authority for power facilities. Proper implementation and monitoring of all conditions of approval

is the responsibility of the CEC compliance project manager (CPM) assigned to the project. The CPM makes every effort to coordinate with the City regarding construction and operation of power plants for which the CEC is responsible.

As stated in the CEC 2001 Staff Assessment, the City of Escondido Fire Department has adopted the Uniform Fire Code with modifications. Detailed project plans are typically reviewed by the Escondido Fire Department for compliance with their modified version of the Uniform Fire Code. The issues of concern to the City Fire Department in 2001 for the EEPP project included:

- Adequate access for fire fighting equipment
- Compliance with the Escondido Fire Code
- Fire flows in area hydrants
- Vegetation management/clearance
- Hazardous materials use

To address the City of Escondido Fire Department concerns for fire related issues, the CEC stipulated Standard Condition of Certification LAND-1 which required that the EEPP project comply with all applicable LORS. This includes fire flows, access and vegetation management/clearance. Energy Commission staff also added Condition of Certification PUB SER-2, requiring installation of fire hydrants at intervals indicated by the City Fire Marshall and access for heavy firefighting equipment. The CBO was designated to be responsible for insuring that the project complies with the City's Uniform Fire Code.

The 2001 CEC Staff Assessment noted that hazardous materials issues were addressed in the Hazardous Materials section of the report. Odors could occur around the project site only in an upset event.

The 2001 CEC Staff Assessment also noted that project application did not include any proposal to install a telephone line to the project site. Pac Bell representatives expressed concern in 2001 that the power plant could generate an electrical current in the telephone line creating a health and safety hazard. Pac Bell recommended that the project include a phone line that has a device to ensure that power generated on the phone line does not reach the Pac Bell phone system. The CEC added Condition of Certification PUB SER-1 requiring that the applicant submit the proposed phone line plans to the CPM for review and approval prior to excavations related to the phone line. The CPM was responsible for ensuring that the phone facility was constructed in a location where biological, archaeological, or paleontological resources would not be impacted. This requirement is not considered to be applicable to the Enterprise BESS Project.

5.14.2 Environmental Analyses

5.14.2.1 Public Services/Fire Protection

The battery storage technologies being considered is lithium iron phosphate (LFP). Planned fire protection systems include an active aerosol based thermal activated fire suppression system in each individual battery container as well as a centralized fire detection alarm system that can be configured to independently dial the Energy Management System (EMS) in the case of a fire or thermal event. Each battery will be equipped with its own coolant-based chiller to keep the batteries at an optimal temperature and prevent thermal runaway. The temperature control system will be managed by the plant controller and will send out notification to a 24/7 monitoring center. Each battery container will be equipped with a blast door designed to deploy in the event of an explosion and direct any hot gas and energy upwards and away from any adjacent equipment or personnel. The applicant will prepare a BESS Emergency Response Plan that will be combined with the existing emergency response plans for the EEPP. The applicant will coordinate with the Escondido Fire Department prior to obtaining fire permits in advance of BESS operations.

5.14.2.2 Wildfire

The CEC Final Decision and Staff Assessment for the EEPP (CEC 2001a,b) did not address wildfire hazard provisions which were enacted after the EEPP was approved in 2001. The Enterprise BESS Project site is located at 201 Enterprise Street in Escondido, California. The BESS project site is located in a highly industrialized area, and the site areas have been previously graded and developed with the EEPP and auto body repair shop related facilities. The northern portion of the EEPP site where the BESS interconnection related facilities will be installed is currently covered with pavement and gravel in the switchyard area. The elevated berm/hill to the north where the aboveground gen-tie cable tray will be installed is vegetated with Canary Island pine trees. The northern three parcels area is fully developed with structures and/or pavement with the exception of a small strip on the southern hillside that will be excavated to create more flat usable space for BESS facility installation. The EEPP and northern parcels sites are bounded to the north, east, and south by existing industrial and commercial land uses. The SDG&E-owned land to the west of the EEPP and northern parcels sites include a transmission line corridor and is open land vegetated with shrubs and grasses between the western border of the EEPP site and Citracado Parkway approximately 350 feet to the west.

A review of the Office of the State Fire Marshall, California Department of Fire and Forestry (CalFire), California Fire Hazard Severity Zones website viewer identifies the EEPP property and the Enterprise BESS site area as being located in a Local Responsibility Area and not within a Very High Fire Hazard Severity Zone (VHFHSZ) (https://egis.fire.ca.gov/FHSZ/). The City of Escondido Fire Severity Zones Map identifies the EEPP/BESS site area as having a moderate fire danger (City of Escondido 2024b).

The Enterprise BESS Project facilities such as BESS enclosures, inverters, and switchyard facilities will be unoccupied structures and will be constructed primarily of non-flammable materials/metal. The facilities will be surrounded by perimeter access roads and/or a concrete wall on the southern and southwestern boundaries. The existing fire water loop connection will be available, if needed, for any incidents at the EEPP BESS interconnection facilities area. Fire water will be available at the norther parcels site as well.

Refer to Appendix H for a discussion of applicable fire safety measures and considerations for the proposed Enterprise BESS Project.

5.14.3 Mitigation Measures

The impacts related to public services and wildfire hazards are expected to be less than significant and, therefore, will not require additional mitigation measures.

5.14.4 Consistency with LORS

The project will conform to applicable laws related to public services and fire protection.

5.14.5 Conditions of Certification

The CEC stipulated the following CoCs for public services for the EEPP project in 2001:

PUB SER-1: *Prior to commencement of excavations related to the telephone line the project owner shall submit plans showing the location of the telephone facilities necessary to serve the project for review and approval.*

Verification: *The CPM shall review plans for construction of the phone line and related facilities to ensure that construction related to these facilities would occur in developed area where sensitive biological, archaeological, or paleontological resources would not be impacted.*

This Condition is not expected to be applicable to the Enterprise BESS Project. The BESS Project does not include plans to install a telephone line.

PUB SER-2: *Prior to commencement of project construction, the project owner shall have fire hydrants installed at intervals indicated by the City of Escondido Fire Marshall and access for heavy firefighting equipment shall be sufficient to accommodate fire department equipment.*

Verification: *The CBO shall inspect the site to ensure that fire equipment access and fire hydrants have been installed to meet Fire Marshall requirements.*

The Enterprise BESS Project will comply with this requirement, as applicable to the BESS Project.

The proposed Enterprise BESS Project is not expected to require new CEC CoCs for public services/fire protection. Refer to Appendix H for more information regarding Fire Safety considerations for the Enterprise BESS Project.

5.14.6 References

CalFire. FHSZ Viewer. 2024. Accessed February 16, 2024. https://egis.fire.ca.gov/FHSZ/

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____.2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

City of Escondido. 2024a. Fire Station No. 1. Website accessed February 17, 2024. https://www.escondido.org/station-1.aspx

___. 2024b. City of Escondido Fire Severity Zones Map. Accessed February 17, 2024.

https://fire.escondido.org/fire-severity-zone.aspx

5.15 Waste Management

5.15.1 CEC Certification of EEPP

The CEC Final Decision and Staff Assessment for the EEPP (CEC 2001a,b) did not provide an assessment of Waste Management. However, the CEC did stipulate Waste Management CoCs. The stipulated CoCs for the EEPP are applicable to the Enterprise BESS Project as well.

5.15.2 Environmental Analyses

The Enterprise BESS Project will generate small quantities of waste during construction and associated with maintenance and battery augmentation events during the operational phase. In the event that spent or degraded batteries need to be removed from the BESS facility during the operational phase and/or during decommissioning, the batteries will be handled as Universal Waste and be recycled or disposed of in an approved manner in accordance with applicable regulations at the time of removal. No adverse impacts related to waste management will occur.

5.15.3 Mitigation Measures

The Enterprise BESS Project will not result in a significant impact related to waste management and no mitigation measures related to waste management be required.

5.15.4 Consistency with LORS

The project conforms to applicable laws related to waste management.

5.15.5 Conditions of Certification

The following EEPP CoCs for waste management apply to the Enterprise BESS Project:

WASTE-1: *The project owner shall obtain a hazardous waste generator identification number from the Department of Toxic Substances Control prior to producing any hazardous waste.*

Verification: *The project owner shall keep its copy of the identification number on file at the project site.*

WASTE-2: *The project owner shall have an environmental professional available for consultation during soil excavation and grading activities. The environmental professional shall be given full authority to oversee any earth moving activities that have the potential to disturb contaminated soil. The environmental professional shall meet the qualifications of such as defined by the American Society for Testing and Materials designation E 1527-97 Standard Practice for Phase I Environmental Site Assessments.*

Verification: *If potentially contaminated soil is unearthed during excavation at either the proposed site or linear facilities, the environmental professional shall inspect the site, determine the need for sampling to confirm the nature and extent of contamination, and make a recommended course of action. The environmental professional shall have the authority to suspend construction activity at that location. If, in the opinion of the environmental professional, remediation is to be required, the project owner shall consult with the CPM and a decision will be made by the CPM within 24 hours as to how to proceed.*

5.15.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____.2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

5.16 Worker Safety

5.16.1 CEC Certification of EEPP

The CEC Final Decision and Staff Assessment for the EEPP (CEC 2001a,b) did not provide an assessment of Worker Safety. However, the CEC did stipulate a worker safety related CoC for compliance with Title 8 of the California Code of Regulations (CCR), beginning with Part 450 (8 CCR Part 450 et seq). The Enterprise BESS Project will comply with applicable California Department of Industrial Relations (DIR), Division of Occupational Safety and Health (CalOSHA),

Title 8 and California Labor Code requirements during the construction and operation of the project.

5.16.2 Environmental Analyses

By complying with the existing condition of certification, as applicable, the Enterprise BESS Project construction and operational phase activities would comply with applicable worker safety protections and all applicable LORS.

5.16.3 Mitigation Measures

The Enterprise BESS impacts related to worker safety are less than significant and, therefore, will not require additional mitigation measures.

5.16.4 Consistency with LORS

The project conforms to applicable laws related to worker safety.

5.16.5 Conditions of Certification

The following EEPP CoC for worker safety generally applies to the Enterprise BESS Project. However, portions of Title 8 CCR, beginning with Part 450 do not apply to the Enterprise BESS Project such as the portions addressing regulations for Unfired Pressure Vessel Safety Orders et al.

WORKER SAFETY-1: *The project owner must comply with all requirements in Title 8 of the California Code of Regulations, beginning with Part 450 (8 CCR Part 450 et seq).*

Verification: *The project owner shall submit to the CPM a letter attesting to compliance with the above and shall report any violations to the CPM.*

5.16.6 References

California Energy Commission (CEC). 2001a. Final Decision, Application for Certification of the CalPeak Enterprise #7 Peaker Project by CalPeak Power Enterprise, LLC. June 6, 2001.

____.2001b. CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit. June 1, 2001.

APPENDIX B
ENTERPRISE BESS-ONLY CONDITIONS OF CERTIFICATION

Based on a review of existing CEC Conditions of Certification for the Enterprise Emergency Peaker Project (EEPP), this appendix presents a list of Enterprise BESS-Only Conditions. Table B-1 presents a summary of the proposed Enterprise BESS-Only Conditions. This Table also includes an itemization of EEPP Conditions determined to be "not applicable" to the Enterprise BESS Project. In addition, some EEPP Conditions will need to be revised to facilitate compliance by making these Conditions specific to the BESS Project.

Table B-1. Summary List of Assumed Enterprise BESS-Only Conditions of Certification

Topic	Summary of Existing CEC Conditions for Enterprise Emergency Peaker Project[1]	Applicable to BESS Project (Y/NA)[2]
Air Quality	AQ-1: Construction Fugitive Dust Mitigation Plan	Y
	AQ-2: SDAPCD ATC/PTO Permit Compliance	Not Applicable (NA) (no air permit required for BESS)
	AQ-3: SDAPCD ATC BACT Compliance	NA (no air permit required for BESS)
Biological Resources	BIO-1: Avoid all Impacts to Legally Protected Species and their Habitat	Y
	BIO-2: Avoid all Significant Impacts to Designated Critical Habitat	Y
	BIO-3: Avoid all Impacts to Locally Designated Sensitive Species and Protected Areas	Y
	BIO-4: Reduce Risk of Bird Electrocution via Facilities Design in Accordance with APLIC 1996	Y
	BIO-5: Project Biologist and CPM Construction Duties and Authority to Stop Work	Y
	BIO-6: Decommissioning Reclamation Requirements for Reestablishment of Pre-construction Biological Resource Values	Y
	BIO-7: Pre-construction FWS Protocol Surveys for California Gnatcatchers	Y
	BIO-8: Raptor Breeding Season Protocol Survey Requirements	Y
	BIO-9: Fencing Sensitive Habitat Prior to Site Mobilization and Post Construction Site Review	Y
	BIO-10: Post Construction Impacted Habitat and Mitigation Compensation Plans at 2:1 for DCSS and 0.5:1 for NNG	Y

Topic	Summary of Existing CEC Conditions for Enterprise Emergency Peaker Project[1]	Applicable to BESS Project (Y/NA)[2]
	BIO-11: Restoration Plan Requirement for Offsite Construction Laydown Area	Y
	The applicant proposes adding a new Condition, BIO-12, Worker Environmental Awareness Program for biological resources with focus on Cooper's hawk as described in Appendix A, Section 5.4, Biological Resources and Appendix D.	New BESS-Only Condition BIO-12
Cultural Resources	CUL-1: Avoid all Significant Impacts to Cultural Resources and Inadvertent Discovery Requirements for Suspected Cultural Material or Human Remains	Y
Facility Design	GEN-1: Design Project in Accordance with CA Building Code and Applicable LORS	Y
	GEN-2: Schedule of Facility Design Submittals	Y
Hazardous Materials Management	HAZ-1: CPM Approval Requirement for Use of Hazardous Materials in Reportable Quantities	Y
	HAZ-2: Hazardous Material Business Plan and Risk Management Plan Requirements for CPM and County Fire Department Review	Y
Land Use	LAND-1: Federal, State, and Local LORS Compliance Requirements	Y
	LAND-2: Driveway Plans Review by City of Escondido Public Works Department	Y
Noise	NOISE-1: Compliance with Applicable Community Noise Standards	Y
	NOISE-2: Residents Notification within One Mile Prior to Start of Rough Grading and Noise Complaint Process	Y
	NOISE-3: Noise Complaint Documentation and Resolution	Y
	NOISE-4: Night Construction Time Limitations	Y
	The applicant proposes adding three new Noise Conditions: NOISE-5, Construction Noise Reduction Measures; NOISE-6, Operational Noise Reduction Measure; and NOISE-7, Prepare and Implement a Vibration Control Plan During Construction as described in Appendix A, Section 5.9, Noise and Vibration, and Appendix F.	New BESS-Only Conditions NOISE-5, NOISE-6, AND NOISE-7

Topic	Summary of Existing CEC Conditions for Enterprise Emergency Peaker Project[1]	Applicable to BESS Project (Y/NA)[2]
Paleontological Resources	PAL-1: Avoid all Significant Impacts to Paleontological Resources	Y
Public Services	PUB SER-1: Plan Submittal Requirement for Telephone Line Excavations	NA (no telephone line excavation planned)
	PUB SER-2: Fire Hydrant and Access Road Requirements	Y
Soil & Water	SOIL & WATER-1: NPDES for Construction	N (disturbance footprint is <1 acre threshold)
	SOIL & WATER-2: Erosion Prevention and Sediment Control Plan	Y
	SOIL & WATER-3: Valid Water Service Agreement Documentation	Y
	SOIL & WATER-4: Wastewater Discharge Permit	NA (no onsite wastewater discharge planned)
	SOIL & WATER-5: Wastewater Disposal via Tanker Truck to Appropriate Disposal Facility	Y
	SOIL & WATER-6: SWPPPs with BMPs	Y
Traffic and Transportation	TRANS-1: Transportation Permits/Overweight & Oversize Vehicles	Y
	TRANS-2: Encroachment Permits	Y
	TRANS-3: Licensed Hazardous Material Haulers	Y
	TRANS-4: Roadway Repairs	Y
	TRANS-5: Driveway and Parking Area Paving Requirements	Y
Transmission System Engineering	TSE-1: Transmission Facilities Design, Construction, and Operation Requirements as per GO 95 et al	Y
Visual Resources	VIS-1: Structure Color Plan	Y
	VIS-2: Shielded Lighting and Local Requirements Compliance	Y
	VIS-3: Landscape Plan in accordance with City of Escondido Landscape Ordinance Requirements	Y

Topic	Summary of Existing CEC Conditions for Enterprise Emergency Peaker Project[1]	Applicable to BESS Project (Y/NA)[2]
Waste Management	WASTE-1: Hazardous Waste Generator ID (DTSC)	Y
	WASTE-2: Environmental Professional for Evaluation of Potentially Contaminated Soil if Encountered	Y
Worker Safety	WORKER SAFETY-1: Compliance with CCR Title starting with Part 450 (8 CCR Part 450 et seq)	Y

[1]Refer to Enterprise Emergency Peaker Project (01-EP-10) Conditions of Certification as Amended (updated August 12, 2020) for full text of existing Conditions of Certification, including Verification requirements.

[2]Refer to the environmental analyses in Section 5/Appendix A for more detail.

APPENDIX C

AIR QUALITY AND GREENHOUSE GAS STUDY

Enterprise Battery Energy Storage System (BESS) Project

Air Quality and Greenhouse Gas Study

prepared for

Enterprise BESS LLC
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Escondido, California 92029

prepared by

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Revised March 2025

RINCON CONSULTANTS, INC. SINCE 1994

Table of Contents

Tables

Figures

Appendices

1 Project Description

1.1 Introduction

This study analyzes the air quality and greenhouse gas (GHG) emissions impacts associated with the construction, operation, and decommissioning of the Enterprise Battery Energy Storage System (BESS) Project in Escondido in San Diego County, California. Please note this air quality and GHG study supersedes the original assessment dated March 2024 submitted to the California Energy Commission (CEC) in March 2024 as part of the Petition for Post-Certification Amendment (Petition) to add a nominal 52-megawatt (MW) BESS to the existing Enterprise Emergency Peaker Project. The layout of the Enterprise BESS Project was modified following submittal of the March 2024 Petition to Amend, and this supplemental study analyzes the revised Project. This revised study supersedes the previous study.

Table 1 provides a summary of Project impacts.

Table 1 Summary of Impacts

Issue	Project's Level of Significance	Applicable Recommendations
Would the Project conflict with or obstruct implementation of the San Diego RAQS or applicable portions of the SIP?	Less-than-significant impact (Construction) Less-than-significant impact (Operation)	None
Would the Project violate any air quality standard or contribute substantially to an existing or Projected air quality violation? Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the SDAB is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Less-than-significant impact (Construction) Less-than-significant impact (Operation)	None
Would the Project expose sensitive receptors (i.e., day care centers, schools, retirement homes, and hospitals or medical patients in residential homes which could be impacted by air pollutants) to substantial pollutant concentrations?	Less-than-significant impact (Construction) Less-than-significant impact (Operation)	None
Would the Project create objectionable odors affecting a substantial number of people?	Less-than-significant impact (Construction) Less-than-significant impact (Operation)	None
Would the Project release substantial quantities of air contaminants beyond the boundaries of the premises upon which the stationary source emitting the contaminants is located?	Less-than-significant impact (Construction) Less-than-significant impact (Operation)	None
Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	Less-than-significant impact (Construction) Less-than-significant impact (Operation)	None
Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?	Less-than-significant impact (Construction) Less-than-significant impact (Operation)	None

GHG = greenhouse gas; RAQS= Regional Air Quality Strategy; SDAB= San Diego Air Basin; SIP = State Implementation Plan

1.2 Project Summary

1.2.1 Project Location

The Enterprise BESS Project is located in the city of Escondido, California. The Project includes interconnection related facilities that are co-located with the existing CalPeak Power Enterprise Emergency Peaker Plant (EEPP) within the northern portion of Assessor's Parcel Number (APN) 232-410-45-00 at 201 Enterprise Street. The Project also includes 52 MW of BESS facilities to be installed on an approximately 0.82-acre site located at 2361 Auto Park Way on APNs 232-410-21-00, 232-410-20-00, and 232-410-19-00. The BESS facilities will be connected to the low side of the existing generation step-up (GSU) transformer at the EEPP via an approximately 350-foot-long gen-tie to be installed on an above ground cable tray.

The Project Area is located west of Interstate 15 and south of Ronald Packard Parkway (State Route 78) in Escondido, California (Figure 1 and Figure 2). The EEPP property is located approximately 300 feet east of Citracado Parkway and 200 feet south of Auto Park Way. The BESS facilities, including modular battery containers and associated equipment, are located adjacent to and south of Auto Park Way. The 0.82-acre BESS site was most recently used as the Auto Art Paint & Body business up until January 2025. The combined Project Area encompassing all four APNs is bound by industrial/commercial land uses to the north, northwest, east, and south. The area between Citracado Parkway to the west and the EEPP and the Auto Park Way parcels to the east is undeveloped land with the exception of transmission infrastructure. Other land uses in the area include the Palomar Medical Center directly across Citracado Parkway, single-family residential approximately 1,100 feet to the northwest, 1,700 feet to the southwest as measured from the Project Area boundary, and north and northeast across State Route 78 and east of Interstate 15.

Figure 1 Regional Location

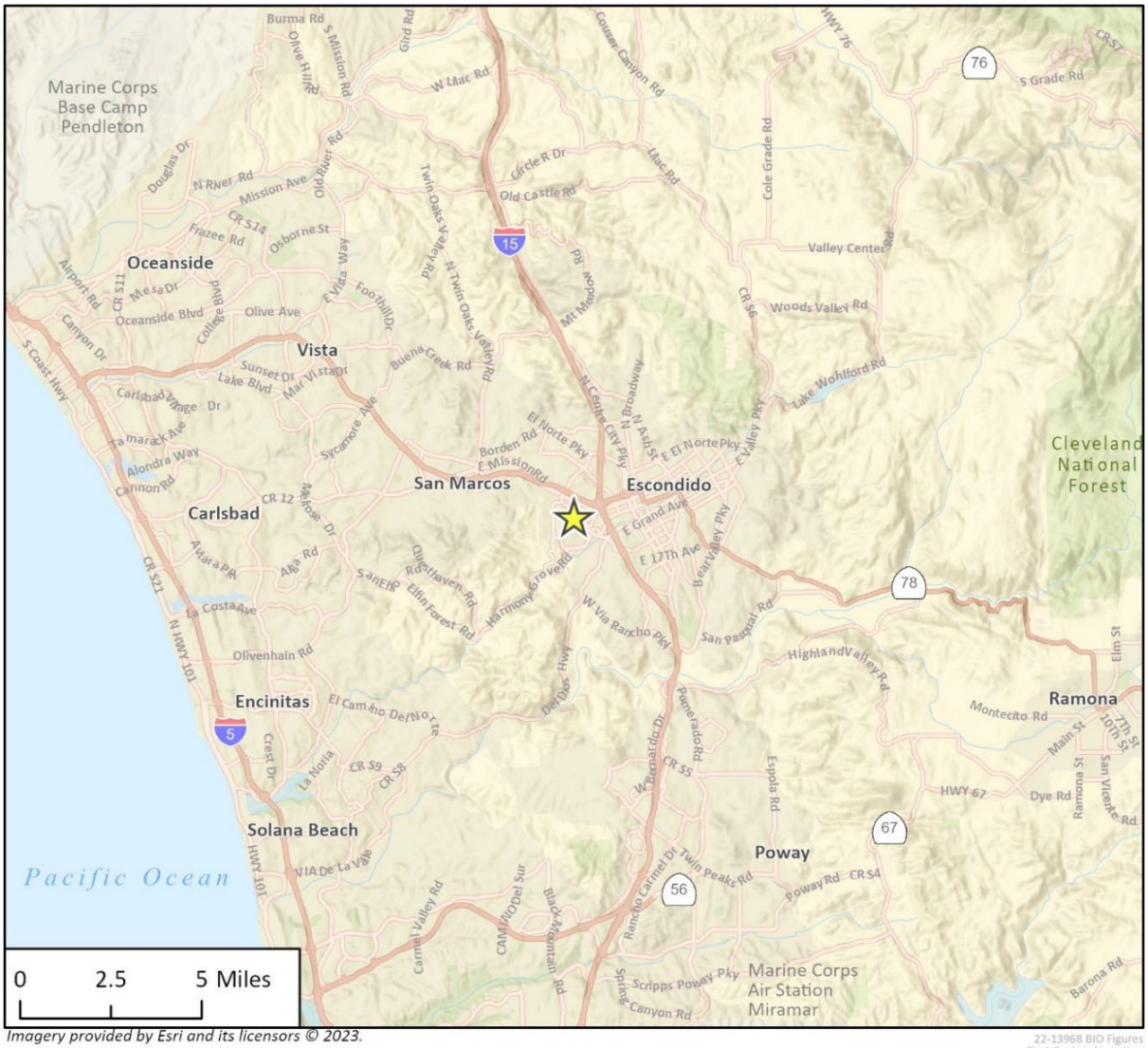

Figure 2 BESS Project Area

Imagery provided by Microsoft Bing and its licensors © 2025.

24-16971 Bio
Fig 2 Study Area

1.2.2 Project Description

Enterprise BESS LLC plans to construct, own and operate a nominal 52 MW BESS Project (Project). The Project is located in Escondido, California on portions of four parcels as previously described. The Project will be co-located with the existing CalPeak Power–EEPP) that was licensed by the CEC in 2001 (CEC Docket No. 01-EP-10).

The Project would support California's current need for additional electrical supply capacity during high peak-load demand periods. The Project would use approximately 0.1 acre of available open areas within the northern portion of the overall 2.94-acre EEPP parcel, plus approximately 0.82 acre of additional adjacent land to the north on three parcels to the south of Auto Park Way, for a total of an approximately 1-acre area of disturbance. The Project would include containerized battery systems with internal heating ventilation and air conditioning and internal fire detection and fire suppression systems in each container, battery management systems, power conversion systems (also called inverters), transformers, and electrical conductors. The Project includes an approximately 350-foot-long 13.8-kilovolt (kV) gen-tie line supported on aboveground cable tray to connect the BESS to the existing EEPP switchyard GSU transformer. The elevated cable tray would be supported on pile foundations and/or concrete pads. Access to the EEPP is via the existing peaker plant entrance on Enterprise Street and the access to the northern BESS parcels is via the adjacent Auto Park Way.

Project-related improvements on the northern portion of the EEPP parcel include installation of: (1) gen-tie on elevated cable tray; (2) elevated switchgear platform; and (3) electrical and communication line connections in the EEPP switchgear area, including the low side of the GSU. Minor excavations associated with equipment foundations would be required.

Development of the northern BESS parcels would require: (1) demolition of the existing auto body shop facilities; (2) grading, site preparation, and foundation installation for BESS facilities; (3) installation of an up to 18-foot-tall retaining wall near the southern border of the northern parcels area to stabilize the vertical cut near the property line that is associated with removal of the existing hillside to create an expanded level pad area for the Project. The Project development plan includes the installation of sheet piles along the southern border of the northern parcels to stabilize the cut slope prior to installation of the retaining wall.

The Enterprise BESS would be connected to the electrical grid via the existing GSU at the EEPP, which has an existing 69-kV connection to the San Diego Gas & Electric (SDG&E) Escondido Substation to the north. The Project would not require any high voltage modifications at the EEPP switchyard or the existing off-site 69-kV line. Operation of the BESS facility would be integrated with the existing EEPP, but the BESS will be charged from the electrical grid and not the EEPP. The BESS and the EEPP may be operated simultaneously in accordance with the market-optimized dispatch instructions received from the California Independent System Operator's (CAISO) Automated Dispatching System, but the combined output would be control-limited to never exceed the limit of the Generator Interconnection Agreement.

The Enterprise BESS Project would require discretionary permitting involving approval of a Petition for Post-Certification Amendment from the CEC. The Project's operational life and associated land leases are anticipated to be up to 40 years.

Construction

Construction site mobilization is currently anticipated to begin in the fourth quarter of 2025. Typical construction hours are expected to be from 9:00 a.m. to 5:00 p.m. on Mondays through Fridays and 10:00 a.m. to 5:00 p.m. on Saturdays. Construction equipment to be used includes the following: backhoes, bore/drill rigs, compactors, compressors, cranes, dozers, graders, excavators, forklifts, loaders (front-end, rubber-tired, and skid steer), pavers, portable electric generators, rough terrain forklifts, sweepers, welders, dump trucks, and water trucks. A percussion pile driver may be needed for construction of the retaining wall and for installation of foundations for the gen-tie cable tray. A detailed list of construction equipment is provided in Appendix A.

Operation

Operation of the Enterprise BESS facility would be integrated with the existing EEPP, but the BESS will be charged from the electrical grid and not the EEPP. Commercial operation is currently anticipated for the fourth quarter of 2026. The facilities would be expected to require regular maintenance visits by two workers up to twice per week on average. The planned Project life is 40 years.

Enterprise Emergency Peaker Project Air Quality Conditions of Certification

The impact assessment presented herein assumes that the following CEC air quality conditions for the EEPP shall also apply for the Enterprise BESS Project, as applicable.

AQ-1. Prior to the commencement of project construction, the project owner shall prepare a Construction Fugitive Dust Mitigation Plan that will specifically identify fugitive dust mitigation measures that will be employed for the construction of the project and related facilities. Measures that should be addressed include the following:

- The identification of the employee parking area(s) and surface of the parking area(s);
- The frequency of watering of unpaved roads and disturbed areas;
- The application of chemical dust suppressants;
- The stabilization of storage piles and disturbed areas;
- The use of gravel in high traffic areas;
- The use of paved access aprons;
- The use of posted speed limit signs;
- The use of wheel washing areas prior to large trucks leaving the project site;
- The methods that will be used to clean tracked-out mud and dirt from the project site onto public roads; and
- For any transportation of borrowed fill material, the use of covers on vehicles, wetting of the material, and insuring appropriate freeboard of material in the vehicles.

Verification. The project owner shall submit to the CPM a letter attesting to compliance with the above and shall report any violations to the CPM.

AQ-2. The project owner shall comply with the terms and conditions of the Authority to Construct and the Permit to Operate issued by the San Diego Air Quality Management District (SDAQMD).

Verification. In the event that the air district finds the project to be out of compliance with the terms and conditions of the Authority to Construct, the project owner shall notify the CPM of the violation, and the measures taken to return to compliance, within five days.

AQ-3. The project owner shall operate the project in compliance with all BACT standards imposed by the air district in its Authority to Construct. Failure to meet these standards will result in a finding that the project owner is out of compliance with the certification.

2 Background

2.1 Environmental Settings

2.1.1 Climate and Meteorological Conditions

The Project site is located in Escondido in San Diego County. The Project site is in the San Diego Air Basin (SDAB), which is bordered by the Pacific Ocean to the west, South Coast Air Basin to the north, Salton Sea Air Basin to the east, and United States (U.S.)/Mexico border to the south. Regional wind patterns are dominated by onshore sea breezes during the day, and winds generally slow or reverse direction toward the sea at night. Temperature and precipitation can vary widely within the SDAB, where average annual precipitation ranges from approximately 10 inches in the coastal and inland areas to over 30 inches in the mountains. In general, milder annual temperatures are experienced in the maritime and coastal areas, whereas the interior and desert areas experience warmer summers and cooler winters. The majority of the unincorporated county is located in the interior and desert zones, approximately 25 miles inland from the coast to the county's eastern border. The Project site is located approximately 17 miles inland from the inner harbor of San Diego Bay.

High air pollution levels in coastal communities of San Diego can often occur when polluted air from the South Coast Air Basin, particularly from Los Angeles, travels southwest over the ocean at night and is brought on shore into San Diego by the sea breeze during the day (SDAPCD 2015). Ozone (O_3) and its precursor emissions (reactive organic gases [ROG] and nitrogen oxides [NO_X]) are also transported to San Diego during relatively mild Santa Ana weather conditions, which tend to occur between October through March when high pressure builds over the Great Basin of the central Nevada region and hot and dry winds blow westward from the interior regions of the Sierra Nevada, San Gabriel, and San Bernardino mountains to the coastline (Fovell 2002). However, during strong Santa Ana weather conditions, pollutants are pushed away from San Diego far out to sea.

Air pollutant emission sources in the SDAB are typically grouped into two categories: stationary and mobile sources. Mobile source emissions can be attributed to vehicles and transportation-related activities. Stationary sources can be divided into two major subcategories: point and area sources. Point source emissions originate from manufacturing and industrial processes, while area emissions are generated from residential heaters, small engines, and other consumer products. Both major emissions categories are widely distributed within the SDAB and may have a cumulative effect.

Air Quality

Air Pollutants of Concern

The federal Clean Air Act (CAA) and California Clean Air Act (CCAA) mandate the control and reduction of certain air pollutants. Under these laws, the U.S. Environmental Protection Agency (USEPA) and CARB have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for criteria air pollutants that are a threat to public health and welfare. Criteria pollutants that are a concern in the SDAB are described below.

OZONE

O_3 is a highly oxidative unstable gas produced by a photochemical reaction (triggered by sunlight) between NO_X and ROG/volatile organic compounds (VOC).[1] VOC is composed of non-methane hydrocarbons (with specific exclusions), and NO_X is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and nitrogen dioxide (NO_2). NO_X is formed during the combustion of fuels, while ROG is formed during the combustion and evaporation of organic solvents. As a highly reactive molecule, O_3 readily combines with many different atmosphere components. Consequently, high O_3 levels tend to exist only while high VOC and NO_X levels are present to sustain the O_3 formation process. Once the precursors have been depleted, O_3 levels rapidly decline. Because these reactions occur on a regional rather than local scale, O_3 is considered a regional pollutant. In addition, because O_3 requires sunlight to form, it mainly occurs in concentrations considered serious between April and October. Groups most sensitive to O_3 include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors (USEPA 2021a). Depending on the level of exposure, O_3 can cause coughing and a sore or scratch throat; make it more difficult to breathe deeply and vigorously and cause pain when taking a deep breath; inflame and damage the airways; make the lungs more susceptible to infection; and aggravate lung diseases such as asthma, emphysema, and chronic bronchitis.

NITROGEN DIOXIDE

NO_2 is a by-product of fuel combustion. The primary sources are motor vehicles and industrial boilers, and furnaces. The principal form of NO_x produced by combustion is nitric oxide, but nitric oxide reacts rapidly to form NO_2, creating the mixture of nitric oxide and NO_2, commonly called NO_x. NO_2 is a reactive, oxidizing gas and an acute irritant capable of damaging cell linings in the respiratory tract. Breathing air with a high concentration of NO_2 can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases leading to respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma and children and the elderly are at greater risk for the health effects of NO_2 (USEPA 2021a). NO_2 absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of O_3/smog and acid rain.

CARBON MONOXIDE

Carbon monoxide (CO) is a localized pollutant found in high concentrations only near its source. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic's incomplete combustion of petroleum fuels. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Other sources of CO include the incomplete combustion of petroleum fuels at power plants and fuel combustion from wood stoves and fireplaces during the winter. When CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease. These people already have a reduced ability to get oxygenated blood to their hearts in situations where they need more oxygen than usual. As a result, they are especially vulnerable to the effects of CO when

[1] CARB defines VOC and ROG similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term VOC is used in this report.

exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina (USEPA 2021a).

PARTICULATE MATTER

Particulates less than 10 microns in diameter (PM_{10}) and less than 2.5 microns in diameter ($PM_{2.5}$) are comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. Both PM_{10} and $PM_{2.}$ are emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. The atmosphere, through chemical reactions, can form particulate matter. The characteristics, sources, and potential health effects of PM_{10} and $PM_{2.5}$ can be very different. PM_{10} is associated with dust mobilized by wind and vehicles. In contrast, $PM_{2.5}$ is associated with combustion processes and formation in the atmosphere as a secondary pollutant through chemical reactions. PM_{10} can cause increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling. For $PM_{2.5}$, short-term exposures (up to 24-hours duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases (CARB 2022a).

SULFUR DIOXIDE

Sulfur dioxide (SO_2) is included in a group of highly reactive gases known as "oxides of sulfur." The largest sources of SO_2 emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of SO_2 emissions include industrial processes, such as extracting metal from ore and burning fuels with a high sulfur content by locomotives, large ships, and off-road equipment. Short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult. People with asthma, particularly children, are sensitive to these effects of SO_2 (USEPA 2021a).

LEAD

Lead (Pb) is a metal found naturally in the environment and in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial. However, due to the USEPA's regulatory efforts to remove Pb from gasoline, atmospheric Pb concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred before 1990 due to the removal of Pb from gasoline sold for most highway vehicles. Pb emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least partly due to national emissions standards for hazardous air pollutants. As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest Pb level in the air is found near Pb smelters. Other stationary sources include waste incinerators, utilities, and Pb-acid battery manufacturers. Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and cardiovascular system depending on exposure. Pb exposure also affects the oxygen-carrying capacity of the blood. The Pb effects most likely encountered in current populations are neurological in children. Infants and young children are susceptible to Pb exposures, contributing to behavioral problems, learning deficits, and lowered intelligence quotient (USEPA 2021a).

TOXIC AIR CONTAMINANTS

In addition to the criteria pollutants discussed above, toxic air contaminants (TAC) are airborne substances comprised by a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about 1/70th the diameter of a human hair) and thus is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2022a). TACs are different than criteria pollutants, because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2020).

Sensitive Receptors

Some receptors are considered more sensitive than others to air pollutants. The reasons for greater than average sensitivity include pre-existing health problems, proximity to emissions sources, or duration of exposure to air pollutants. Schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because children, elderly people, and the infirmed are more susceptible to respiratory distress and other air quality-related health problems than the general public. Residential areas are considered sensitive to poor air quality because people usually stay home for extended periods of time, with greater associated exposure to ambient air quality. Recreational uses are also considered sensitive due to the greater exposure to ambient air quality conditions because vigorous exercise associated with recreation places a high demand on the human respiratory system. The closest sensitive receptor is a Palomar Medical Center Escondido located directly across Citracado Parkway to the west. The facility building is located approximately 950 feet west of the Project Area boundary. CARB's *Air Quality and Land Use Handbook: a Community Health Perspective* recommends a buffer zone of up to 1,000 feet between various pollutant sources and sensitive receptors (CARB 2005). There are no other identified sensitive receptors within 1,000 feet of the facility.

2.1.2 Greenhouse Gas

Gases that trap heat in the atmosphere are known as greenhouse gases (GHGs). GHGs allow sunlight to enter the atmosphere but trap a portion of the outward-bound infrared radiation that warms the air. The process is similar to the effect greenhouses have in raising the internal temperature of the structure. Both natural processes and human activities emit GHGs. The accumulation of GHGs in the atmosphere regulates the Earth's temperature, but emissions from human activities (such as fossil fuel-based electricity production and the use of motor vehicles) have elevated the concentration of GHGs in the atmosphere. Scientists agree that this accumulation of GHGs has contributed to an increase in the temperature of the Earth's atmosphere and to global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and

temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most scientists agree there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and natural processes, such as oceanic evaporation, largely determine its atmospheric concentrations.

GHGs are emitted by natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are usually by-products of fossil fuel combustion, and CH_4 results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, CH_4 has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).[2]

Greenhouse Gases

Carbon Dioxide

Carbon dioxide (CO_2) is the primary GHG emitted through human activities. In 2020, CO_2 accounted for about 79 percent of all U.S. GHG emissions from human activities. CO_2 is naturally present in the atmosphere as part of the Earth's carbon cycle (the natural circulation of carbon among the atmosphere, oceans, soil, plants, and animals). Human activities are altering the carbon cycle–both by adding more CO_2 to the atmosphere, and by influencing the ability of natural sinks, like forests and soils, to remove and store CO_2 from the atmosphere. While CO_2 emissions come from a variety of natural sources, human-related emissions are responsible for the increase that has occurred in the atmosphere since the industrial revolution (USEPA 2022a).

Methane

CH_4 is a colorless, odorless gas and is the major component of natural gas. In 2020, CH_4 accounted for about 11 percent of all U.S. GHG emissions from human activities. Human activities emitting CH_4 include leaks from natural gas systems and the raising of livestock. CH_4 is also emitted by natural sources, such as natural wetlands. In addition, natural processes in soil and chemical reactions in the atmosphere help remove CH_4 from the atmosphere. CH_4's lifetime in the atmosphere is much shorter

[2] The Intergovernmental Panel on Climate Change's (2021) *Sixth Assessment Report* determined that CH_4 has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for CH_4, consistent with the Intergovernmental Panel on Climate Change's (2007) *Fourth Assessment Report*. Therefore, this analysis uses the GWPs from the Fourth Assessment Report.

than CO_2, but CH_4 is more efficient at trapping radiation than CO_2. Pound for pound, the comparative impact of CH_4 is 25 times greater than CO_2 over a 100-year period (USEPA 2022a).

Nitrous Oxide

N_2O is a clear, colorless gas with a slightly sweet odor. In 2020, N_2O accounted for about seven percent of all U.S. GHG emissions from human activities. Human activities such as agriculture, fuel combustion, wastewater management, and industrial processes are increasing the amount of N_2O in the atmosphere. N_2O is also naturally present in the atmosphere as part of the Earth's nitrogen cycle and has a variety of natural sources. N_2O molecules stay in the atmosphere for an average of 114 years before being removed by a sink or destroyed through chemical reactions. The impact of 1 pound of N_2O on warming the atmosphere is almost 300 times that of 1 pound of CO_2 (USEPA 2022a).

Fluorinated Gases (HFCs, PFCs and SF_6)

Unlike many other GHGs, fluorinated gases have no natural sources and only come from human-related activities. They are emitted through their use as substitutes for O_3-depleting substances (e.g., as refrigerants) and through a variety of industrial processes such as aluminum and semiconductor manufacturing. Many fluorinated gases have very high GWPs relative to other GHGs, so small atmospheric concentrations can have disproportionately large effects on global temperatures. They can also have long atmospheric lifetimes, in some cases, lasting thousands of years. Like other long-lived GHGs, most fluorinated gases are well-mixed in the atmosphere, spreading around the world after they are emitted. Many fluorinated gases are removed from the atmosphere only when they are destroyed by sunlight in the far upper atmosphere. In general, fluorinated gases are the most potent and longest lasting type of GHGs emitted by human activities (USEPA 2022a).

The use of SF_6 in electric utility systems and switchgear, including circuit breakers, poses a concern, because this pollutant has an extremely high GWP (1 pound of SF_6 is the equivalent warming potential of approximately 23,900 pounds of CO_2). SF_6 is inert, non-toxic, and is encapsulated in the breaker assembly. SF_6 is a GHG with substantial GWP, because of its chemical nature and long residency time within the atmosphere. However, under normal conditions, it would be completely contained in the equipment and SF_6 would only be released in the unlikely event of a failure, leak, or crack in the circuit breaker housing. New circuit breaker designs have been developed over the past several years to minimize the potential for leakage, compared to that of past designs. Pacific Gas and Electric Company (PG&E) began the quest to eliminate SF_6 circuit breakers from their systems in approximately 2017, by communicating with manufacturers. New 72-kV circuit breakers were SF_6-free within PG&E's service area starting in 2019. In 2022, PG&E is beginning to install 123-kV SF_6-free circuit breakers in the San Francisco Bay Area. These efforts are anticipated to reduce approximately 1 million tons of GHG emissions from PG&E operations by the end of 2022 (PG&E 2021).

Greenhouse Gas Emissions Inventory

Global Emissions Inventory

In 2019, worldwide anthropogenic emissions totaled 48,940 billion metric tons (MT) of CO_2e, which is a 50 percent increase from 1990 GHG levels (USEPA 2025). Specifically, 36,442 million metric tons (MMT)[3] of CO_2e of CO_2, 8,298 MMT of CO_2e of CH_4, 3,064 MMT of CO_2e of N_2O, and 1,136 MMT of CO_2e of fluorinated gases were emitted in 2018. The largest source of GHG emissions were energy

[3] This was the most recent information available at the time the analysis was completed.

production and use (includes fuels used by vehicles and buildings), which accounted for 76 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and 6 percent, respectively. Waste sources contributed for 3 percent. These sources account for approximately 97 percent, because there was a net sink of three percent from land-use change and forestry (ClimateWatch 2018).

United States Emissions Inventory

U.S. GHG emissions were 6,343 MMT of CO_2e in 2022. Emissions increased by one percent from 2021 to 2022; since 2005, total U.S. emissions have decreased by 17 percent from 2005 to 2022. The increase in total GHG emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion. In 2022, CO_2 emissions from fossil fuel combustion increased by 1 percent relative to 2021. This increase in fossil fuel consumption emissions was from increased energy use, due in part to the continued rebound in economic activity after the height of the COVID-19 pandemic. In 2022, transportation activities accounted for the largest portion (28 percent) of total U.S. GHG emissions. Emissions from electric power accounted for the second largest portion (25 percent), while emissions from industry accounted for the third largest portion (23 percent) of total U.S. GHG emissions in 2022 (USEPA 2022b).[4]

California Emissions Inventory

Based on CARB California Greenhouse Gas Inventory for 2000-2022, California produced 371 MMT of CO_2e in 2022, which is 35 MMT of CO_2e lower than 2020 levels. The major source of GHG emissions in California is the transportation sector, which comprises 39 percent of the state's total GHG emissions. The industrial sector is the second largest source, comprising 23 percent of the state's GHG emissions, while electric power accounts for approximately 16 percent (CARB 2023, 2022c). The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO_2e (CARB 2023). The annual 2030 statewide target emissions level is 260 MT of CO_2e (CARB 2017).[5]

City of Escondido Emission Inventory

The City of Escondido's Climate Action Plan (CAP) provides a baseline GHG emissions inventory for the city in 2012 (City of Escondido 2021). It was estimated that the city produced 943,000 $MTCO_2e$ in 2012. The two largest sources of community GHG emissions were from on-road transportation (e.g., on-road gasoline and diesel mobile consumption) and energy sources (e.g., electricity and natural gas consumption in buildings) accounting for 53 percent and 39 percent, respectively. The remaining emissions are from off-road transportation (3 percent), solid waste (3 percent), and water and wastewater (2 percent).[6]

[4] This was the most current information available at the time of the analysis.
[5] This was the most current information available at the time of the analysis.
[6] This is the most current inventory provided for the City at the time of the analysis.

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. Each of the past three decades has been warmer than all the previous decades in the instrumental record, with 2013 to 2021 among the warmest years from 1880 to 2021. The average global land and ocean surface temperature for January to December 2021 was 0.84°Celsius (°C) (1.51 degrees Fahrenheit [°F]) above the twentieth century average of 13.9°C (57°F) (National Oceanic and Atmospheric Administration 2020). Furthermore, several independently analyzed data records of global and regional land-surface air temperature obtained from station observations jointly indicate that land-surface air temperature and sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014, 2018).

Potential impacts of climate change in California may include reduced water supply from snowpack, sea-level rise, more extreme heat days per year, more large forest fires, and more drought years (California Natural Resource Agency 2018). *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state and regionally specific climate change case studies. However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy (California Natural Resource Agency 2018). A summary follows some of the potential effects that climate change could generate in California.

Air Quality

Scientists project that the annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C (4.3°F to 5.8°F) in the next 50 years and by 3.1 to 4.9°C (5.6°F to 8.8°F) in the next century (California Natural Resource Agency 2018). Higher temperatures are conducive to air pollution formation, and rising temperatures could therefore result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level O_3, but the magnitude of the effect, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the state has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains (California Natural Resource Agency 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. With increasing temperatures, shifting weather patterns, longer dry seasons, and more dry fuel loads, the frequency of large wildfires and area burned is expected to continue to increase (California Natural Resources Agency 2021).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year

variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring snowpack in the western U.S., including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts (California Natural Resource Agency 2018). The Sierra Nevada Mountains snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack. Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (California Natural Resource Agency 2018).

Hydrology and Sea-Level Rise

Climate change could affect the intensity and frequency of storms and flooding (California Natural Resource Agency 2018). Furthermore, climate change could induce substantial sea-level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding. The rate of increase of global mean sea levels between 1993 to 2020, observed by satellites, is approximately 3.3 millimeters per year, double the twentieth century trend of 1.6 millimeters per year (World Meteorological Organization 2013, National Aeronautics and Space Administration 2020). Global mean sea levels in 2024 were about 0.1 meter higher than those of 1993 (National Aeronautics and Space Administration 2024). Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea-level rise ranging between 0.25 to 0 1.01 meters by 2100 with the sea-level ranges dependent on a low, intermediate, or high GHG emissions scenario (IPCC 2021). A rise in sea levels could erode 31 to 67 percent of Southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (California Natural Resource Agency 2018). Furthermore, increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has an over $50 billion annual agricultural industry that produces over a third of the Country's vegetables and two-thirds of the Country's fruits and nuts (California Department of Food and Agriculture 2020). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (California Natural Resource Agency 2018). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems and Wildlife

Climate change and the potential resultant changes in weather patterns could have ecological effects on the global and local scales. Soil moisture is likely to decline in many regions with higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage (Parmesan 2006, California Natural Resource Agency 2018).

2.2 Regulatory Setting

2.2.1 Air Quality

Federal and State

The CAA and CCAA establish ambient air quality standards and establish regulatory authorities designed to attain those standards. As required by the CAA, the USEPA has identified criteria pollutants and has established NAAQS to protect public health and welfare. NAAQS have been established for O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and Pb.

Under the CCAA, California has adopted the CAAQS, which are more stringent than the NAAQS for certain pollutants and averaging periods. Table 2 presents the current attainment status for each regulated pollutant and Table 3 presents the federal and state standards for regulated pollutants. California also has established state ambient air quality standards for sulfates, hydrogen sulfide, and vinyl chloride.

As required by the federal CAA and the CCAA, air basins or portions thereof have been classified as either “attainment” or “nonattainment” for each criteria air pollutant, based on whether the standards have been achieved. The air quality in an attainment area meets or is better than the NAAQS or CAAQS. A nonattainment area has air quality that is worse than the NAAQS or CAAQS. States are required to adopt enforceable plans, known as a State Implementation Plan (SIP), to achieve and maintain air quality meeting the NAAQS.

The SDAPCD is the designated air quality control agency for the SDAB. The SDAB currently meets the NAAQS for all criteria air pollutants except O_3 and is classified an attainment/maintenance area for CO and unclassifiable for PM_{10}. The SDAB is currently classified as a nonattainment area under the CAAQS for O_3, PM_{10}, and $PM_{2.5}$. Characteristics of O_3, CO, NO_2, and suspended particulates are described in the subsequent sections.

Table 2 Federal and State Ambient Air Quality Standards

Pollutant	Federal Attainment Status	State Attainment Status
Ozone	Nonattainment (eight-hour)/Attainment (one-hour)	Nonattainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
PM_{10}	Unclassified	Nonattainment
$PM_{2.5}$	Unclassified/Attainment	Nonattainment
H_2S	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility	No Federal Standard	Unclassified
Pb	Attainment	Attainment

CO = carbon monoxide, NO_X = nitrogen oxides, SOx = sulfur oxides, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; H_2S = Hydrogen Sulfide, Pb = lead

Sources: California Air Resources Board 2025

Existing Ambient Air Quality

The SDAPCD maintains the ambient air monitoring network and records air quality readings throughout the SDAB. The monitoring stations aim to measure ambient concentrations of pollutants and determine whether ambient air quality meets California and federal standards. Current Air Quality information is obtained from the same, or closest monitoring area the Project is located. The monitoring station closest to the Project site is the Camp Pendleton station (located at 21441-W B Street in Camp Pendleton), approximately 16 miles northwest of the Project site. This station collects eight-hour O_3, hourly O_3, NO_2, and $PM_{2.5}$ measurements. The El Cajon- Lexington Elementary School station (located at 533 South First Street in El Cajon) collected PM_{10} measurements for 2019 and before. This station is approximately 25 miles southwest of the Project Area. There is no data available in the County of San Diego for PM_{10} measurements past 2019.

Table 3 indicates the number of days each federal and state standard exceeded at Camp Pendleton station. As shown therein, in 2023, O_3 eight-hour average measurements exceeded the federal and state eight-hour O_3 standards. Insufficient data were available in 2021, 2022, and 2023 to determine measurements for PM_{10} and 2021 for $PM_{2.5}$ measurements. No other state or federal standards were exceeded at these monitoring stations. Since CO and SO_2 are in attainment with the SDAB region, they are not monitored at the nearest air monitoring stations and therefore ambient air quality is not reported for these two pollutants.

Table 3 Ambient Air Quality at the Nearest Monitoring Station

Pollutant	2021	2022	2023
Ozone (ppm), Eight-Hour Average[1]	0.059	0.067	0.077
Number of Days of state exceedances (>0.070 ppm)	0	0	1
Number of days of federal exceedances (>0.070 ppm)	0	0	1
Ozone (ppm), Worst Hour[1]	0.074	0.076	0.090
Number of days of state exceedances (>0.09 ppm)	0	0	0
Number of days of federal exceedances (>0.112 ppm)	0	0	0
Nitrogen Dioxide (ppm), Worst Hour[1]	0.059	0.050	0.063
Number of days of state exceedances (>0.18 ppm)	0	0	0
Number of days of federal exceedances (>0.10 ppm)	0	0	0
Particulate Matter 10 microns, μg/m^3, Worst 24 Hours[1]	–	–	–
Number of days of state exceedances (>50 μg/m^3)	–	–	–
Number of days above federal standard (>150 μg/m^3)	–	–	–
Particulate Matter <2.5 microns, μg/m^3, Worst 24 Hours[1]	*	17.0	26.5
Number of days above federal standard (>35 μg/m^3)	*	0	0

ppm = parts per million; μg/m^3 = micrograms per cubic meter

[1] Measurements taken from the Camp Pendleton station at 21441-W B Street in Camp Pendleton

* Insufficient information

Source: California Air Resources Board 2025

Regional

Air Quality Management Plans

2020 Attainment Plan

In October 2020, the SDAPCD adopted the *2020 Plan for Attaining the National Ambient Air Quality Standards for O_3 in San Diego County* (2020 Attainment Plan) and the *2020 Reasonably Available Control Technology Demonstration for the National Ambient Air Quality Standards for Ozone in San Diego County* to demonstrate how the SDAPCD will reduce air pollutant emissions to achieve attainment of the NAAAQS for O_3 (SDAPCD 2020a, 2020b). At this time, the 2020 Attainment Plan has been submitted to CARB for review, and if approved, will be submitted to the USEPA as a revision to the California SIP for attaining the NAAQS for O_3. The 2020 Attainment Plan includes regionwide inventories of O_3 precursors, a Reasonably Further Progress demonstration that shows emissions reductions during the years leading to attainment, an assessment of Reasonably Available Control Technology and Reasonable Available Control Measures, a vehicle mile traveled (VMT) offset demonstration, and contingency measures for use in the event that emissions controls do not achieve the needed reductions. The 2020 Attainment Plan determines that: (1) the SDAB can expect to reach attainment of the current NAAQS for O_3 by 2032 with implementation of the proposed control measures and (2) the adoption of transportation control strategies and transportation control measures (TCM) in San Diego County offset the projected growth in VMT and vehicle trips (SDAPCD 2020a).

2022 Regional Air Quality Strategy

Under state law, the SDAPCD is required to prepare a plan for air quality improvement for pollutants for which the SDAB is in nonattainment. The SDAPCD prepared the Regional Air Quality Strategy (RAQS) to address state requirements, pursuant to the CCAA of 1988 (California Health and Safety Code Section 39000 et seq.). The CCAA requires areas that are designated nonattainment of the CAAQS for O_3, CO, SO2, and/or N_2O to prepare and implement state plans to attain the standards by the earliest practicable date (California Health and Safety Code Section 40911[a]). With the exception of the O_3 CAAQS, each of these standards has been attained in the SDAB (SDAPCD 2016). Included in the RAQS are the TCMs prepared by the San Diego Association of Governments (SANDAG) that control emissions from mobile sources (SDAPCD 2016). The RAQS and TCMs set forth the steps needed to accomplish attainment of CAAQS for O_3. The most recent update of the RAQS and corresponding TCMs was adopted in 2022 (SDAPCD 2022).

SDAPCD Rules

The SDAPCD implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects. Rules and regulations relevant to the Project include the following:

- **Rules 20.1, 20.2, and 20.3 (New Source Review).** These rules establish permitting standards for new stationary sources of air pollutant emissions and include requirements for the application of BACTs.
- **Rule 50 (Visible Emissions).** This rule prohibits the discharge of visible air pollutant emissions from various sources as determined by shade and opacity criteria based on the Ringelmann Chart.
- **Rule 51 (Nuisance).** This rule prohibits the discharge of quantities of air contaminants or other material that causes injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.
- **Rule 55 (Fugitive Dust Control).** This rule prohibits construction and demolition activities from discharging visible dust emissions into the atmosphere beyond the property line. This rule also requires fugitive dust control measures to minimize and remove vehicle track-out associated with construction and demolition operations.
- **Rule 67.0.1 (Architectural Coatings).** This rule establishes VOC content limits for a variety of architectural coatings, including 50 grams per liter for flat coatings, 100 grams per liter for nonflat and traffic marking coatings, and 150 grams per liter for nonflat-high gloss coatings.

Local

City of Escondido General Plan

The General Plan and 2022 General Plan Amendment for the City of Escondido include a set of goals, policies, and recommendations that represents a shared vision for the future of the city (City of Escondido 2012, 2022). Specific goals or policies in the City of Escondido General Plan that pertain to air quality are as follows:

- **Air Quality and Climate Protection Goal 7:** Improved air quality in the city and the region to maintain the community's health and reduce green-house gas emissions that contribute to climate change.
  - **Air Quality and Climate Protection Policy 7.1:** Participate in regional planning efforts and coordinate with the San Diego Air Pollution Control District and San Diego Association of Governments in their efforts to reduce air quality impacts and attain state and federal air quality standards.
  - **Air Quality and Climate Protection Policy 7.2:** Reduce regional greenhouse gas emissions through the following measures including, but not limited to: a) Implementing land use patterns that reduce automobile dependence (compact, mixed-use, pedestrian, and transit-oriented development, etc.); b) Reducing the number of vehicular miles traveled through implementation of Transportation Demand Management programs, jobs-housing balance, and similar techniques; c) Supporting public transportation improvements; d) Encouraging the use of alternative modes of transportation by expanding public transit, bicycle, and pedestrian networks and facilities; e) Participating in the development of park-and-ride facilities; f) Maintaining and updating the city's traffic signal synchronization plan; g) Promoting local agriculture; h) Promoting the use of drought-tolerant landscaping; and i) Encouraging the use of non-polluting alternative energy systems.
  - **Air Quality and Climate Protection Policy 7.3:** Require that new development projects incorporate feasible measures that reduce construction and operational emissions.
  - **Air Quality and Climate Protection Policy 7.4:** Locate uses and facilities/operations that may produce toxic or hazardous air pollutants an adequate distance from each other and from sensitive uses such as housing and schools as consistent with California Air Resources Board recommendations.
  - **Air Quality and Climate Protection Policy 7.5:** Consider the development of park and ride facilities within the city in coordination with Caltrans.
  - **Air Quality and Climate Protection Policy 7.6:** Restrict the number and location of drive-through facilities in the city and require site layouts that reduce the amount of time vehicles wait for service.
  - **Air Quality and Climate Protection Policy 7.7:** Encourage businesses to alter local truck delivery schedules to occur during non-peak hours, when feasible.
  - **Air Quality and Climate Protection Policy 7.8:** Require that government contractors minimize greenhouse gas emissions in building construction and operations, which can be accomplished through the use of low or zero-emission vehicles and equipment.
  - **Air Quality and Climate Protection Policy 7.9:** Encourage city employees to use public transit, carpool, and use alternate modes of transportation for their home to work commutes.
  - **Air Quality and Climate Protection Policy 7.10:** Purchase low-emission vehicles for the city's fleet and use clean fuel sources for trucks and heavy equipment, when feasible.
  - **Air Quality and Climate Protection Policy 7.11:** Educate the public about air quality, its effect on health, and efforts the public can make to improve air quality and reduce greenhouse gas emissions.

2.2.2 Greenhouse Gas

Federal Regulations

Federal Clean Air Act

The U.S. Supreme Court determined in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) that the USEPA has the authority to regulate motor vehicle GHG emissions under the federal CAA. The USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the USEPA issued a Final Rule that established the GHG permitting thresholds that determine when CAA permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities.

In *Utility Air Regulatory Group v. Environmental Protection Agency* (134 Supreme Court 2427 [2014]), the U.S. Supreme Court held that the USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source can be considered a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The U.S. Supreme Court also held that Prevention of Significant Deterioration permits otherwise required based on emissions of other pollutants may continue to require limitations on GHG emissions based on the application of BACT.

State Regulations

CARB is responsible for the coordination and oversight of state and local air pollution control programs in California. There are numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below.

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, the USEPA granted the waiver of CAA preemption to California for its GHG emission standards for motor vehicles, beginning with the 2009 model year, which allows California to implement more stringent vehicle emission standards than those promulgated by the USEPA. Pavley I regulates model years from 2009 to 2016 and Pavley II, now referred to as "LEV (Low Emission Vehicle) III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, the rules will be fully implemented, and new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels.

California Global Warming Solutions Act of 2006 (Assembly Bill 32 and Senate Bill 32)

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO_2e, which was achieved

in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2008). Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan's approval.

The CARB approved the 2013 Scoping Plan update in May 2014. The update defined the CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align California's longer term GHG reduction strategies with other state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100. The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of 6 MT of CO_2e by 2030 and 2 MT of CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects, because they include all emissions sectors in the state.

The Draft 2022 Scoping Plan Update has been prepared to assess the progress towards the 2030 target and to outline a plan to achieve carbon neutrality no later than 2045. The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet California's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities (CARB 2022b).

Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed in August 2008, enhances the state's ability to reach AB 32 goals by directing the CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations are required to adopt a Sustainable Communities Strategy (SCS), which allocates land uses in the Metropolitan Planning Organization's Regional Transportation Plan (RTP). Qualified projects consistent with an approved SCS or Alternative Planning Strategy (categorized as "transit priority projects") can receive incentives to streamline California Environmental Quality Act (CEQA) processing.

On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The SANDAG is the regional planning agency for San Diego County and serves as a forum for regional issues relating to transportation, the economy, community development, and

the environment. The SANDAG Board of Directors adopted the final RTP with a SCS on October 28, 2011. The SCS is a new element of the 2050 RTP. Legislation requires Metropolitan Planning Organizations to prepare a SCS as part of their RTPs, along with the traditional policy, action, and financial requirements. The SCS lays out how the region will meet GHG reduction targets set by CARB. CARB's targets call for the region to reduce per capita emissions 7 percent by 2020 and 13 percent by 2035 from a 2005 baseline. There are no mandated targets beyond 2035 (SANDAG 2022).

Senate Bill 1383

Adopted in September 2016, SB 1383 (Lara, Chapter 395, Statutes of 2016) requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. SB 1383 requires the strategy to achieve the following reduction targets by 2030:

- **CH_4** – 40 percent below 2013 levels
- **Hydrofluorocarbons** – 40 percent below 2013 levels
- **Anthropogenic black carbon** – 50 percent below 2013 levels

SB 1383 also requires the California Department of Resources Recycling and Recovery, in consultation with the CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Senate Bill 100

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the California's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Executive Order B-55-18

On September 10, 2018, former Governor Brown issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

Local Regulations

City of Escondido Climate Action Plan

In March of 2021, the City of Escondido adopted a CAP that sets forth strategies to address the challenges of climate change in Escondido. This CAP's reduction targets were established using a communitywide mass emissions approach as recommended by CARB (City of Escondido 2021). These targets, to be achieved through implementation of the CAP, are to reduce citywide GHG emissions to 4 percent below 2012 levels by 2020, 42 percent below 2012 levels by 2030, and 52 percent below 2012 levels by 2035 (City of Escondido 2021).

In addition to reducing GHG emissions the CAP will create green jobs, improve public health, increase local control over the city's future, promote education on energy efficiency, enhance the quality of life for residents, and reduce municipal water, waste and energy usage in City-owned buildings. The CAP demonstrates that the City acknowledges the existing and potential impacts of a changing climate and

is committed to keeping it in the forefront of decision-making. Successful implementation of the CAP will: 1) prepare for anticipated climate change impacts in the coming decades, 2) help California achieve its reduction target by contributing the city's fair share of GHG reductions, and 3) have a positive impact on the regional economy.

The CAP serves as a Qualified GHG Reduction Plan for the purposes of tiering under CEQA as it meets the requirements set forth in *CEQA Guidelines* Section 15183.5. The CAP provides a Consistency Checklist as a streamlined review process for GHG emissions from new development projects subject to CEQA.

City of Escondido General Plan

The General Plan and 2022 General Plan Amendment for the City of Escondido include a set of goals, policies, and recommendations that represents a shared vision for the future of the City (City of Escondido 2012). Specific goals or policies in the City of Escondido General Plan that pertain to GHG emissions and climate are as follows:

- **Air Quality and Climate Protection Goal 7**: Improved air quality in the city and the region to maintain the community's health and reduce green-house gas emissions that contribute to climate change.
  - **Air Quality and Climate Protection Policy 7.1:** Participate in regional planning efforts and coordinate with the San Diego Air Pollution Control District and San Diego Association of Governments in their efforts to reduce air quality impacts and attain state and federal air quality standards.
  - **Air Quality and Climate Protection Policy 7.2:** Reduce regional greenhouse gas emissions through the following measures including, but not limited to: a) Implementing land use patterns that reduce automobile dependence (compact, mixed-use, pedestrian, and transit-oriented development, etc.); b) Reducing the number of vehicular miles traveled through implementation of Transportation Demand Management programs, jobs-housing balance, and similar techniques; c) Supporting public transportation improvements; d) Encouraging the use of alternative modes of transportation by expanding public transit, bicycle, and pedestrian networks and facilities; e) Participating in the development of park-and-ride facilities; f) Maintaining and updating the city's traffic signal synchronization plan; g) Promoting local agriculture; h) Promoting the use of drought-tolerant landscaping; and i) Encouraging the use of non-polluting alternative energy systems.
  - **Air Quality and Climate Protection Policy 7.3:** Require that new development projects incorporate feasible measures that reduce construction and operational emissions.
  - **Air Quality and Climate Protection Policy 7.4:** Locate uses and facilities/operations that may produce toxic or hazardous air pollutants an adequate distance from each other and from sensitive uses such as housing and schools as consistent with California Air Resources Board recommendations.
  - **Air Quality and Climate Protection Policy 7.5:** Consider the development of park and ride facilities within the city in coordination with Caltrans.
  - **Air Quality and Climate Protection Policy 7.6:** Restrict the number and location of drive-through facilities in the city and require site layouts that reduce the amount of time vehicles wait for service.
  - **Air Quality and Climate Protection Policy 7.7:** Encourage businesses to alter local truck delivery schedules to occur during non-peak hours, when feasible.

- **Air Quality and Climate Protection Policy 7.8:** Require that government contractors minimize greenhouse gas emissions in building construction and operations, which can be accomplished through the use of low or zero-emission vehicles and equipment.
- **Air Quality and Climate Protection Policy 7.9:** Encourage city employees to use public transit, carpool, and use alternate modes of transportation for their home to work commutes.
- **Air Quality and Climate Protection Policy 7.10:** Purchase low-emission vehicles for the city's fleet and use clean fuel sources for trucks and heavy equipment, when feasible.
- **Air Quality and Climate Protection Policy 7.11:** Educate the public about air quality, its effect on health, and efforts the public can make to improve air quality and reduce greenhouse gas emissions.

3 Impact Analysis

3.1 Methodology

Criteria pollutant and GHG emissions for Project construction and operation were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.29. CalEEMod allows for the use of default data (e.g., emission factors, trip lengths, meteorology, source inventory) provided by the various California air districts to account for local requirements and conditions, and/or user-defined inputs. The input data and subsequent construction and operation emission estimates for the Project are summarized below and detailed in Appendix A. CalEEMod output files for the Project are included in Appendix B.

In addition to regulatory guidance, impacts are considered in the context of the required CoCs from the 2001 CEC license, and additional mitigation measures are recommended where needed. Construction-related activity and non-paved ground disturbance from the Project will involve grading, road construction, and battery storage facilities. Applicable CoCs developed for the original EEPP Project are identified in Section 1.2 above and are included in the analysis where applicable.

3.1.1 Construction Emissions

Construction emissions modeled include emissions generated by construction equipment used on-site and emissions generated by vehicle trips associated with construction, such as worker and truck delivery trips. CalEEMod estimates construction emissions by multiplying the amount of time equipment is in operation by emission factors.

Construction emissions of criteria air pollutants and GHGs include emissions generated by construction equipment used on-site and emissions generated by vehicle trips associated with construction, such as worker and truck delivery trips. CalEEMod estimates construction emissions by multiplying the amount of time equipment is in operation by emission factors.

Construction of the Project was analyzed based on the applicant-provided construction schedule, equipment list, and construction related vehicle trips. The schedule was modeled by construction activity to best capture the construction that would occur. Construction is anticipated to begin in the fourth quarter of 2025 with construction ending in the fourth quarter of 2026 and lasting approximately 13 months. Construction is anticipated to occur Monday through Friday with equipment operating for up to 8 hours per day. CalEEMod defaults for horsepower and load factors were used. Truck trips were modeled as heavy-duty truck trips and conservatively assumed the CalEEMod default one-way distance of 20 miles used for haul trucks.

Construction equipment would incorporate Tier 4 final engines. The demolition and grading phases of Project construction would result in the import of rocks and export of soils and debris, which would generate hauling truck trips to and from the site. This analysis relies on the conservative daily truck trips provided and does not base haul trucks on specific quantities of import and export.

The Project would include a fiber optic communications/control cable to connect the BESS facilities to the EEPP transmission control system. This cable may be installed either overhead or underground. As a conservative estimate of emissions, it was assumed that the cable would be installed underground via trenching activities. Some of the soils may be exported from the site for disposal.

This analysis assumes that the Project would comply with all applicable regulatory standards. In particular, the Project would comply with SDACPD Rule 55 to control fugitive dust emissions from construction activities. This rule is modeled within CalEEMod by assuming that watering would occur twice a day. Construction activities assume that haul and worker trucks would access the site at different rates during the various construction phases. No vendor trucks are expected during Project construction.

3.1.2 Operational Emissions

In CalEEMod, operational sources of criteria pollutant and GHG emissions include area, energy, and mobile sources. The first year of operation was assumed to be 2026 based on the provided construction schedule. The facilities were modeled as a refrigerated warehouse of 6,400 square feet. The refrigerated warehouse land use was used to account for the electric requirements for maintaining a stable temperature for optimum battery effectiveness. There would be negligible area, annual water consumption, or solid waste generation source emissions associated with the Project, since the Project would be typically unmanned and would require only limited maintenance equipment. The BESS facility would be unmanned except during periodic maintenance visits where one or two workers would perform routine maintenance on the facilities typically up to two times per week, for a maximum of up to 4 one-way vehicle trips per day or eight one-way vehicle trips per week.

SF_6 Emissions

The proposed Project will not require any new circuit breaker switches and thus will not result in any potential need for SF_6 use on-site.

3.1.3 Project Decommissioning

As stated in Section 1.2, Project Summary, at the end of the Projects' useful life (anticipated to be up to 40 years), the BESS facilities would be decommissioned. Activities required for deconstruction of the on-site facilities would require similar types and levels of equipment as those used during the construction phase. Therefore, decommissioning was not modeled separately and is assumed to be equivalent to the construction emissions.

3.2 Significance Thresholds

Based on the *CEQA Guidelines*, the Project would have a significant impact if it would:

- Conflict with or obstruct implementation of the applicable air quality plan?
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project sites region is nonattainment under an applicable federal or state ambient air quality standard?
- Expose sensitive receptors to substantial pollutant concentrations?
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?
- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

3.2.1 Air Quality

The City of Escondido has adopted guidelines for determining the significance of a project's air quality impacts based on Appendix G of the *CEQA Guidelines*. A project would have a significant impact if it would:

- Conflict with or obstruct implementation of the applicable air quality plan
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation
- Result in cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including release emissions which exceed quantitative thresholds for O_3 precursors)
- Expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates
- Create objectionable odors affecting a substantial number of people
- Release substantial quantities of air contaminants beyond the boundaries of the premises upon which the stationary source emitting the contaminants is located

To determine whether a project would result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation under bullet two above or result in a cumulatively considerable net increase of any criteria pollutant for which the SDAB is nonattainment (i.e., O_3 precursors, PM_{10}, and $PM_{2.5}$) under bullet three above, project emissions may be evaluated based on the quantitative screening emission thresholds established by the City of Escondido's Municipal Code Chapter 33, Article 47. Article 47 of the City of Escondido Municipal Code establishes the Environmental Quality Regulations to implement CEQA guidelines for development projects within Escondido. The screening-level thresholds established by the Environmental Quality Regulations and used in this analysis to evaluate the Project's construction and operational emissions are presented in Table 4. A project that exceeds these criteria does not necessarily have a significant impact on the environment; rather, they determine whether further analysis would be required to determine the potential significant impacts of the project (i.e., like an air dispersion modeling study).

Table 4 City of Escondido Screening Level Significance Thresholds

Pollutant	Environmental Quality Ordinance Criteria (pounds per day)
VOCs	55
NO_x	55
CO	550
SO_x	250
PM_{10}	NA
$PM_{2.5}$	150

VOC = volatile organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_x = sulfur oxides, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Source: Escondido Municipal Code 2016, Article 47

In addition, the Project's potential to generate objectionable odors affecting a substantial number of people is evaluated in light of the State of California Health and Safety Code Sections 41700 and 41705, and SDAPCD Rule 51, commonly referred to as public nuisance law, which prohibit emissions from any source whatsoever in such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to the public health or damage to property.

3.2.2 Greenhouse Gas

The significance criteria used to evaluate the Project impacts to GHG emissions are based on the recommendations provided in Appendix G of the *CEQA Guidelines* (14 CCR 15000 et seq.). For the purposes of the GHG analysis, a significant impact would occur if the Project would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs

The majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines*, Section 15064[h][1]).

According to *CEQA Guidelines* Section 15183.5, project analysis can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals in their white paper, *Best Practices in Implementing Climate Action Plans*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions (Association of Environmental Professionals 2016). The City of Escondido has adopted a qualified CAP with a consistency checklist to determine significance. Significance for the Project will be based on consistency with the Escondido CAP as determined by the CAP Consistency Checklist, as well as consistency with the 2022 Scoping Plan Update.

3.3 Project-Level Air Quality Project Impacts

Threshold 1:	Would the Project conflict with or obstruct implementation of the San Diego RAQS or applicable portions of the SIP??

Impact AQ-1 THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SAN DIEGO 2020 RAQS OR APPLICABLE PORTIONS OF THE SIP (I.E., THE 2020 ATTAINMENT PLAN). THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Pursuant to the federal CAA, the SDAPCD is required to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. Strategies to achieve these emissions reductions are developed in the RAQS and 2020 Attainment Plan (the SDAPCD's portion of the state's SIP), which are prepared by the

SDAPCD for the region. Consistency with the RAQS and the 2020 Attainment Plan is determined by analyzing a project's consistency with the assumptions in the RAQS and the 2020 Attainment Plan. Thus, the emphasis of this discussion is to evaluate if the Project's land uses would be consistent with or less intensive than the emission forecasts for the Project site contained in the RAQS and 2020 Attainment Plan. The growth forecasts used in the RAQS and the 2020 Attainment Plan are developed by SANDAG. SANDAG forecasts are based on local general plans and other related documents that are used to develop population, employment, and traffic projections. The emissions inventory forecasts in the RAQS are based on the growth forecasts from the SANDAG San Diego Forward: The Regional Plan (2015), while the emissions inventory forecasts in the 2020 Attainment Plan are based on the demographic forecasts from the more recent SANDAG San Diego Forward: The 2019 Federal Regional Transportation Plan (2019).

The Project is not anticipated to result in an increase in employment and would only require an estimated total of four weekly round trips for two existing employees to visit the site twice per week. This change would not induce population growth in the city. Therefore, the Project would not increase the population of Escondido or the employment inventory. Therefore, the Project would not increase the population of or the employment inventory, either directly or indirectly, and the project would not exceed the forecasts used in air quality plans. Furthermore, as detailed below under Thresholds 2 and 3, the Project would not result in a significant air quality impact with regards to construction- and operational-related emissions of O_3 precursors or criteria air pollutants. In addition, the Project would comply with existing and new rules and regulations as they are implemented by the CEC's COCs, SDAPCD, CARB, and/or the USEPA related to emissions generated during construction. Specifically, COC AQ-2 and AQ-3 which require compliance with SDAQMD's conditions of the Authority to construct and permit to operate as well as incorporating all BACTs imposed by the Authority to Construct .Therefore, the Project would not conflict with or obstruct implementation of the San Diego RAQS or applicable portions of the SIP (i.e., the 2020 Attainment Plan), and a less-than-significant impact would occur.

Threshold 2:	Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?
Threshold 3:	Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the SDAB is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for O_3 precursors)?

Impact AQ-2 THE PROJECT WOULD NOT VIOLATE ANY AIR QUALITY STANDARDS OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION OR RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE PROJECT REGION IS IN NONATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed under Section 2.3, *Air Quality Regulation*, criteria pollutants include O_3, CO, N_2O, PM_{10}, $PM_{2.5}$, SO_2, and Pb. The SDAB is designated nonattainment for the NAAQS and CAAQS for O_3 and the CAAQS for PM_{10} and $PM_{2.5}$. The SDAB is designated unclassifiable or in attainment for all other federal and state standards.

3.3.1 Construction and Decommissioning Emissions

Construction of the Project would require approximately 13 months of activity. The Project construction would generate air pollutant emissions from on-site equipment, entrained dust, off-road equipment uses, and vehicle emissions. Off-site emissions would be generated by construction worker daily commute trips and heavy-duty diesel haul and vendor truck trips. The decommissioning emissions would be similar or slightly less than the construction activities. All decommissioning activities would adhere to the requirements of the appropriate governing authorities and be conducted in accordance with all applicable federal, state, and county regulations. The Project would be required to comply with COC AQ-1 that requires the implementation of a Construction Fugitive Dust Mitigation Plan, which will identify measures that will be employed by the project and related facilities to reduce fugitive dust emissions.

As shown in Table 5 emissions from construction and decommissioning would be below the applicable threshold for all construction phases. Emissions in Table 4 do not include dust reduction measures beyond watering two times per day as required by the air district. Additional measures implemented from the implementation of COC AQ-1 could further reduce PM emissions from what is identified in Table 5. Therefore, Project construction activities would not violate any air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.

Table 5 Estimated Daily Construction Emissions

	Daily Emissions (pounds per day)[1]					
Phase	**VOC**	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Site Demolition	34	4	57	<1	1	1
Site Preparation	1	10	27	<1	4	2
Grading	1	10	27	<1	4	2
Retaining Wall	1	10	39	<1	<1	<1
Set Modules, Inverters, & Switchgear	1	8	43	<1	1	<1
Electrical Wire Installation/Finish Grading	1	7	39	<1	1	<1
Commissioning & Testing	<1	3	10	<1	1	<1
Foundations and Equipment	1	12	56	<1	1	<1
Maximum Daily Emissions	**34**	**12**	**57**	**<1**	**4**	**3**
Screening Threshold	55	55	550	250	NA	150
Exceed Threshold?	No	No	No	No	No	No

VOC = volatile organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SOx = sulfur oxides, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

[1] Emissions include implementation of Tier 4 final equipment and measures from Rule 55 to control fugitive dust.

Source: Appendix B

Operational Emissions

Long-term emissions associated with operation of the Project would be primarily generated by monthly operations and maintenance visits. Operations of the Project would result in negligible long-term emissions from vehicle trips and area source emissions from periodic re-coating of battery enclosures as shown in Table 6. There are no energy sources that emit criteria pollutants associated with the operation of the Project. As shown in Table 6, new operational emissions would not exceed applicable thresholds for criteria pollutants; therefore, Project operation would not violate any air quality standard, contribute substantially to an existing or Projected air quality violation, or result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant. The Project is required to comply with the SDAQMD's BACTs, and terms and conditions of the Permit to Operate, therefore depending on the BACTs and conditions of the Authority to Construct issued by the air district, the emissions presented in Table 6 could be reduced from what is estimated in the analysis.

Table 6 Estimated Operational Emissions

	Daily Emissions (lbs/day)					
Source	**ROG**	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Area	<1	<1	<1	<1	<1	<1
Energy	0	0	0	0	0	0
Mobile	<1	<1	1	<1	<1	<1
Total	**<1**	**<1**	**1**	**<1**	**<1**	**<1**
Screening Threshold	55	55	550	250	NA	150
Exceed Threshold?	No	No	No	No	No	No

ROG = reactive organic gases, NO_X = nitrogen oxides, CO = carbon monoxide, SOx = sulfur oxides, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Source: See Appendix B

Furthermore, energy storage systems, such as the BESS, assist utilities like SDG&E and California in achieving criteria air pollutant emission reductions by providing the means of storing excess renewable electricity generated during off-peak hours for use during peak hours as an alternative to operating other sources of energy, such as peaker plants, which generate air quality emissions from fossil fuel combustion.[7] By expanding SDG&E's and CAISO's access to energy storage systems, the Project would increase the stability and reliability of the existing electrical grid, thereby reducing the need for additional electricity to be generated by fossil fuel power plants during peak hours. The energy conservation achieved by the Project would reduce fossil fuel consumption, thereby reducing criteria air pollutant emissions from the electricity sector. Impacts would be less than significant.

[7] Peaker plants are power plants that are operated only when demand for electricity is high (i.e., during times of peak demand). The Border Peaker Plant is powered by natural gas.

Threshold 4:	Would the Project expose sensitive receptors (i.e., day care centers, schools, retirement homes, and hospitals or medical patients in residential homes which could be impacted by air pollutants) to substantial pollutant concentrations?

Impact AQ-3 THE PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS RELATED TO CO HOTSPOTS OR TACS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Carbon Monoxide Hotspots

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35 parts per million or the federal and state eight-hour standard of 9 parts per million.

The entire SDAB is in conformance with the CAAQS and NAAQS for CO, and most air quality monitoring stations no longer report CO levels. As shown in Table 6, maximum daily CO emissions during Project operations would be less than 1 pound, which would not exceed the threshold of 550 pounds per day. These thresholds are designed to be protective of public health. Based on the low background level of CO in the Project area, ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the Project's negligible level of operational CO emissions, the Project would not create new hotspots or contribute substantially to existing hotspots. Therefore, the Project would not expose sensitive receptors to substantial CO concentrations.

Toxic Air Contaminants

Health impacts associated with TACs are associated with long-term exposure. Due to the minimal emissions expected on-site from routine maintenance and off-site from two employees commuting to the Project site each week, there are no meaningful sources of TACs for the operating phase of the Project and therefore no reason to expect health impacts related to TACs. As such, the greatest potential for TAC emissions would be during construction and decommissioning which may result in a short-term increase of TAC emissions.

Construction and Decommissioning

The greatest potential for TAC emissions during construction and decommissioning would be from heavy equipment operations that generate DPM emissions. Generation of DPM from construction typically occurs in a single area for a short period. Construction of the Project would occur over approximately 13 months.

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (April 2005) recommends against siting sensitive receptors within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. While these siting distances are not particular to construction activities, the primary source of TAC emissions from both freeways and construction equipment is DPM. Therefore, for projects within 1,000 feet of sensitive receptors a refined health risk should be conducted. The nearest sensitive receptor is approximately 950 feet from the Project site. However, the Project would implement the use of all Tier 4 or alternative equipment which reduces DPM emissions substantially from the standard fleet. Additionally, onsite idling of construction equipment and vehicles would be limited to a maximum of five minutes per event. With the implementation of Tier 4 equipment and the incorporation of regulatory idling requirements, emissions would not result an impact to health risk.

Operational

Sources of operational TAC's typically include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities. The Project is not one of these uses, although use of consumer products, such as aerosol cleaning products, may result in minimal emissions of TACs. The Project will not require any new or additional stationary sources of air pollutant emissions. Operations of the Project would not be a substantial source of TACs. Therefore, impacts would be less than significant.

Threshold 5:	Would the Project create objectionable odors affecting a substantial number of people?

Impact AQ-4 THE PROJECT WOULD NOT GENERATE ODORS ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE DURING CONSTRUCTION OR OPERATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 3.2, *Significance Thresholds*, the State of California Health and Safety Code Sections 41700 and 41705 and SDAPCD Rule 51 prohibit emissions from any source whatsoever in such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. An unreasonable odor discernible at the property line of the Project site would be considered a significant odor impact. The Project would generate oil and diesel fuel odors during construction from equipment use as well as odors related to asphalt paving. The odors would be limited to the construction period and would be intermittent and temporary. Furthermore, these odors would dissipate rapidly with distance from in-use construction equipment. With respect to operation, CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommendations regarding the siting of new sensitive land uses near potential sources of odors (e.g., sewage treatment plants, landfills, recycling facilities, biomass operations, autobody shops, fiberglass manufacturing, and livestock operations). BESS site operations are not identified on this list and are not anticipated to have any continuous sources of odor emissions. Therefore, the Project would not generate objectionable odors affecting a substantial number of people, and impacts would be less than significant.

Threshold 6:	Would the Project release substantial quantities of air contaminants beyond the boundaries of the premises upon which the stationary source emitting the contaminants is located?

Impact AQ-5 THE PROJECT WOULD NOT RELEASE SUBSTANTIAL QUANTITIES OF AIR CONTAMINANTS BEYOND THE BOUNDARIES OF THESE PREMISES UPON WHICH THE STATIONARY SOURCE EMITTING THE CONTAMINANT IS LOCATED. NO IMPACT WOULD OCCUR.

The Project does not propose any stationary sources of air pollutant emissions. No impact would occur.

3.4 Cumulative Air Quality Impacts

The geographic scope for the cumulative air quality impact analysis is the SDAB, however some impacts such as odor, health risk, and CO are more noticeable at the local level and therefore cumulative analysis for those focus on the vicinity of the project. Because the SDAB is designated nonattainment for the NAAQS and CAAQS for O_3 and the CAAQS for PM_{10} and $PM_{2.5}$, there is an existing adverse cumulative effect in the SDAB relative to these pollutants.

A project would have a significant cumulative impact if it is inconsistent with the applicable adopted federal and state air quality plans. As discussed under Impact AQ-2, the Project would be consistent with City of Escondido screening thresholds since new operational emissions would not exceed applicable thresholds for criteria pollutants. Additionally, as discussed above under Impact AQ-1, the Project would not conflict with or obstruct implementation of the SDAPCD's RAQS and 2020 Attainment Plan. The Project is required to comply with the SDAQMD's BACTs, and terms and conditions of the Authority to Construct and the Permit to Operate, therefore depending on the BACTs and conditions issued by the SDAQMD, the project emissions could be reduced from what is estimated in the analysis. This would result in less cumulative contributions than discussed above. Therefore, the Project's contribution to cumulative air quality impacts related to criteria air pollutant emissions would be less than significant.

TAC emissions are a localized issue. In general, TAC concentrations are typically highest near the emission source and decline with increased distance. CARB recommends distances that should be incorporated when siting new sources or sensitive receptors near a source of TACs. This ranges from 500–1,000 feet depending on the source category (CARB 2005). Therefore, in the absence of any specific guidance from the SDAPCD, the potential cumulative impacts from TACs were analyzed based on a radius of 1,000 feet measured from the Project site boundary. There are no sensitive receptors within 1,000 feet from the Project boundary; therefore, there is no risk that the combined emissions would result in a cumulatively considerable impact to health risk for nearby populations. Impacts for receptors outside of a 1,000-foot radius of the Project are considered less than significant. Therefore, Project impacts combined with any cumulative project impacts would be considered less than significant for all sensitive receptors as the project would not be seen to have a potential impact at that distance. Therefore, the Project's contribution to cumulative impacts to sensitive receptors related to TACs would be less than significant

As discussed under Impact AQ-3, construction, operation and decommissioning-related traffic is not anticipated to create a CO hotspot. Construction and decommissioning would be short-term and not result in a health risk impact, and there are negligible operational vehicle trips. Therefore, the Project's contribution to cumulative impacts to sensitive receptors related to CO hotspots would be less than significant.

3.5 Project-Level Greenhouse Gas Project Impacts

Threshold 1:	Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1 CONSTRUCTION, OPERATION AND DECOMMISSIONING OF THE PROJECT WOULD DIRECTLY AND INDIRECTLY GENERATE GHG EMISSIONS. HOWEVER, SUCH EMISSIONS WOULD BE OFFSET BY THE LONG-TERM STORAGE OF RENEWABLE ENERGY AND THE PROJECTS WOULD BE CONSISTENT WITH APPLICABLE PLANS, POLICIES, AND REGULATIONS ADOPTED FOR THE PURPOSE OF REDUCING GHG EMISSIONS. NO IMPACT WOULD OCCUR.

3.5.1 Construction and Decommissioning Emissions

Project-related construction emissions are confined to a relatively short period in relation to the overall life of the Project. Construction-related GHG emissions were quantified for informational purposes. Emissions were amortized over the lifetime of the Project (i.e., 40 years). It is assumed that decommissioning GHG emissions would be similar to or slightly less than the construction GHG emissions. Table 7 shows that Project construction would result in a total of approximately 880 MT CO_2e and amortized GHG emissions of 22 MT CO_2e for construction and 22 MT CO_2e for decommissioning.

Table 7 Estimated Construction and Decommissioning GHG Emissions

Construction Phase	Projects Emissions (MT CO_2e)
Site Demolition	31
Site Preparation	82
Grading	82
Retaining Wall	95
Foundations and Equipment	243
Set Modules, Inverters, & Switchgear	158
Electrical Wire Installation/Finish Grading	129
Commissioning & Testing	63
Total	**880**
Amortized (40 years)	**22**

MT CO_2e = million tons of carbon dioxide equivalent

Source: Appendix B

Operational Emissions

The Project would generate GHG emissions during operation from minimal area source, energy consumption and mobile emissions.[8] Operation-related GHG emissions were quantified for informational purposes and are shown in Table 8. As shown, the Project would generate approximately 65 MT CO_2e per year and, including the amortized construction and decommissioning emissions, would result in approximately 109 MT CO_2e per year.

The Project would help address the limitations of the electric grid and the increasing demand for renewable energy by increasing storage capability which improves the reliability of the grid and makes it more resilient to disturbances and peaks in energy demand. As the use of renewable energy increases, the need for battery storage to maintain electrical supply during both peak demand and when the renewable systems are not generating electricity also increases. It is anticipated that the reduction in GHG emissions from non-renewable electricity generating facilities would more than offset the annual GHG emissions anticipated from the Project. Therefore, the Project is anticipated to result in a net benefit with respect to GHG emissions generation.

Table 8 Annual GHG Emissions for the Project

Emission Source	Annual Emissions (MT CO_2e)
Operational	
Area	<1
Energy	35
Mobile	2
Waste	0
Water	0
Refrigeration	28
Total	**65**
Amortized Construction	22
Amortized Decommissioning	22
Total Annual Project Emissions	**109**

MT of CO_2e = metric tons of carbon dioxide equivalent. Numbers may not add up due to rounding.

Source: See Appendix B.

[8] Area sources for this Project refer to consumer products (such as aerosol cleaners) and architectural coating (maintenance re-coating activities for battery storage enclosures).

Threshold 2:	Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

Impact GHG-2 CONSTRUCTION, OPERATION AND DECOMMISSIONING OF THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE PLANS, POLICIES, AND REGULATIONS ADOPTED FOR THE PURPOSE OF REDUCING GHG EMISSIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

CARB's 2022 Scoping Plan, as described above, and the City of Escondido's qualified CAP meet the applicable state reduction goals. Therefore, a project that is consistent with a qualified CAP and the 2022 Scoping Plan would be consistent with the state goals for reducing GHG emissions. The City of Escondido CAP has a CAP Consistency Checklist. The following discussion provides an explanation of how the Project complies with Step 1 and why measures outlined in Step 2 are not applicable to the project. The Checklist is provided as Appendix C. It also demonstrates how the Project would be consistent with the 2022 Scoping Plan.

Step 1 Land Use Consistency

The Project is consistent with the existing General Plan and Community Plan land use and zoning designations. The Project entails adding a BESS facility and includes an approximately 350-foot-long 13.8-kV gen-tie line supported on aboveground cable tray to connect the BESS to the existing EEPP switchyard GSU transformer, which is consistent with the existing permitted uses. Accordingly, the Project's land use and development intensity conform to the land use designations and development intensity requirements set forth in the General Plan, and would therefore, be consistent with established CAP Projections.

For projects that are determined to be consistent with CAP Projections, the next step is to identify if the Project would be estimated to emit fewer than 500 MT CO_2e annually. If found to emit fewer than 500 MT CO_2e, a project would not contribute considerably to cumulative climate change impacts as stated in the City's guidance document, and these projects would be considered consistent with the CAP. As discussed in Impact GHG-1 above, Project construction (amortized) emissions plus annual operation would be 272 MT CO_2e per year, well below the 500 MT CO_2e threshold.

Furthermore, the Project would help address the limitations of the electric grid and the increasing demand for renewable energy by increasing storage capability which improves the reliability of the grid and makes it more resilient to disturbances and peaks in energy demand. As the use of renewable energy increases, the need for battery storage to maintain electrical supply during both peak demand and when the renewable systems are not generating electricity also increases. It is anticipated that the reduction in GHG emissions from non-renewable electricity generating facilities would more than offset the annual GHG emissions anticipated from the Project. Therefore, the Project is anticipated to result in a net benefit with respect to GHG emissions generation. For these reasons, the Project would be consistent with the City's CAP and Step 1 of the CAP Consistency Checklist and is not subject to the measures of the CAP described in Step 2.

Step 2 Consistency with CAP Measures

Step 2 of the CAP consistency review requires that the applicable strategies and actions of the City's CAP are incorporated into the Project. However, as stated above, because the Project would be consistent with the City's CAP and Step 1 of the CAP Consistency Checklist, it is not subject to comply with the measures of the CAP described in Step 2. Therefore, the strategies identified in the CAP Consistency Checklist are not applicable to the Project.

The Project would help address the limitations of the electric grid and the increasing demand for renewable energy by increasing storage capability which improves the reliability of the grid and makes it more resilient to disturbances and peaks in energy demand. As the use of renewable energy increases, the need for battery storage to maintain electrical supply during both peak demand and when the renewable systems are not generating electricity also increases. It is anticipated that the reduction in GHG emissions from non-renewable electricity generating facilities would more than offset the annual GHG emissions anticipated from the Project. Therefore, the Project is anticipated to result in a net benefit with respect to GHG emissions reduction.

Based on the Project's consistency with the existing General Plan and Community Plan land use and zoning designation, the CAP strategies not being applicable due to the nature of the Project, and the Project's overall benefit to GHG reductions throughout the City and region, the Project would be consistent with the CAP. Therefore, impacts would be less than significant.

2022 Scoping Plan

The principal state GHG reduction plans and policies are AB 32, the California Global Warming Solutions Act of 2006, and the subsequent legislation, SB 32 and AB 1279. The goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, California passed AB 1279, which declares California would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet California's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. The 2022 Scoping Plan's strategies that apply to the Project include the following:

- Reducing fossil fuel use, energy demand and VMT
- Building decarbonization
- Maximizing recycling and diversion from landfills

The Project would be consistent with these goals through the expected reduction of fossil fuel use by the implementation of the BESS storage facility that would store electrical energy for additional grid support during peak demand. In addition, the proposed building structures would not incorporate natural gas or propane, and the majority of the electrical needs would be offset by the Project's operations. The Project would be served by and work with SDG&E to provide additional renewable energy through the BESS system installed on-site and would supplement SDG&E's requirement to increase its renewable energy procurement in accordance with SB 100 targets. Therefore, the Project would not conflict with the 2022 Scoping Plan and GHG impacts would be less than significant.

3.6 Greenhouse Gas Cumulative Impacts

The geographic scope for related Projects considered in the cumulative impact analysis for GHG emissions is global, because impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, GHG emissions and climate change are, by definition, cumulative impacts. Thus, the issue of climate change involves an analysis of whether a Project's contribution towards an impact is cumulatively considerable. As discussed under Impact GHG-1 and GHG-2, the Project's cumulative impacts related to GHG emissions would be less than significant, since the Project would be consistent with state plans for reducing GHG emissions. Therefore, the Project's contribution to cumulative GHG impacts would be less than significant, and the Project would have a net benefit in the long-term.

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Appendix A

Assumptions and Calculations

Project Construction Schedule

Construction Schedule	CalEEMod Construction Phase Type	Duration (weeks)	Start Date	End Date	Number of Work Days
Site Demolition	Demolition	6	11/3/2025	12/13/2025	30
Site Preparation and Grading	Site Preparation	5	12/15/2025	1/18/2026	25
Site Preparation and Grading	Grading	5	1/19/2026	2/22/2026	25
Retaining Wall	Building Construction	6	2/23/2026	4/3/2026	29
Foundations and Equipment	Paving	10	4/4/2026	6/12/2026	50
Set Modules, Inverters, & Switchgear	Building Construction	8	6/13/2026	8/7/2026	40
Electrical Wire Installation/Finish Grading	Building Construction	8	8/8/2026	10/2/2026	40
Commissioning & Testing	Building Construction	12	10/3/2026	12/25/2026	60

Project Construction Equipment List

CalEEMod Name	Equipment Name	Demolition	Site Preparation/ Grading	Retaining Wall (Building Construction Phase)	Install Foundations & Equipment (Paving Phase)	Set Modules, Inverters & Switchgear (Building Construction Phase)	Elec. Wire Install/ Finish Grading (Building Construction Phase)	Commissioning/ Testing (Building Construction Phase)
Tractors/Loaders/ Backhoes	Backhoes	1	1	1	1		1	
Tractors/Loaders/ Backhoes	Rock Hammer		1	1	1			
Bore/Drill Rigs	Bore/Drill Rigs				1			
Cement and Mortar Mixers	Cement and Mortar Mixers			1	1			
Concrete/Industrial Saws	Concrete/Industrial Saws	1		1				
Plate Compactors	Compactors		1		1			1
Air Compressors	Compressors		2	2	2	1	1	
Cranes	Cranes			1	1	2	1	
Crushing/Processing Equipment	Crushing/Processing Equipment	1						
Rubber Tired Dozers	Dozers	1	1		1	2	1	
Dumpers/Tenders	Dumpers/Tenders	1	1	1	1			
Excavators	Excavators	1	1	1	1			
Forklifts	Forklifts	1		1				
Tractors/Loaders/ Backhoes	Loaders, Front End	1	1	1	1		1	
Rubber Tired Loaders	Loaders, Rubber Tired			1				
Graders	Motor Graders		1				1	
Off-Highway Trucks	Off-Highway Trucks				2	2	1	1
Pavers	Pavers						1	
Paving Equipment	Paving Equipment						1	
NA	Pickup Trucks	2	2	4	3	3	3	3

CalEEMod Name	Equipment Name	Demolition	Site Preparation/ Grading	Retaining Wall (Building Construction Phase)	Install Foundations & Equipment (Paving Phase)	Set Modules, Inverters & Switchgear (Building Construction Phase)	Elec. Wire Install/ Finish Grading (Building Construction Phase)	Commissioning/ Testing (Building Construction Phase)
Cranes	Pile Drivers			2	2			
Generator Sets	Portable Elec Generators	1	1	2	2	2	2	1
Pumps	Pumps	1	1	1	1			
Rollers	Rollers		1					
Rough Terrain Forklifts	Rough Terrain Forklifts			1	2	1	1	
Skid Steer Loaders	Skid Steer Loaders			1				
Sweepers/Scrubbers	Sweepers/Scrubbers		1		1		1	
Trenchers	Trenchers		1			1		
Welders	Welders			1	2	2	2	2

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Appendix B

CalEEMod Outputs

24-16971 Enterprise BESS Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	24-16971 Enterprise BESS
Construction Start Date	10/1/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.20
Precipitation (days)	12.8
Location	2361 Auto Park Way, Escondido, CA 92029, USA
County	San Diego
City	Escondido
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6214
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.29

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
Refrigerated Warehouse-No Rail	6.40	1000sqft	1.00	6,400	0.00	—	—	—

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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.44	1.35	11.5	56.3	0.10	0.25	0.54	0.79	0.24	0.13	0.37	—	10,692	10,692	0.44	0.15	2.46	10,751
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	34.4	34.1	10.00	56.6	0.07	0.62	3.85	3.97	0.48	1.62	1.73	—	7,055	7,055	0.33	0.45	0.19	7,138
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.85	2.83	5.53	24.3	0.04	0.09	0.69	0.78	0.09	0.24	0.33	—	4,851	4,851	0.20	0.12	0.90	4,892
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.52	0.52	1.01	4.44	0.01	0.02	0.13	0.14	0.02	0.04	0.06	—	803	803	0.03	0.02	0.15	810

2.2. 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.44	1.35	11.5	56.3	0.10	0.25	0.54	0.79	0.24	0.13	0.37	—	10,692	10,692	0.44	0.15	2.46	10,751

Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	34.4	34.1	9.80	56.6	0.06	0.62	3.85	3.97	0.48	1.62	1.73	—	6,997	6,997	0.33	0.45	0.19	7,138
2026	0.86	0.83	10.00	39.0	0.07	0.12	3.85	3.97	0.12	1.62	1.72	—	7,055	7,055	0.31	0.45	0.18	7,100
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.85	2.83	0.66	5.57	< 0.005	0.05	0.15	0.21	0.04	0.06	0.10	—	413	413	0.02	0.03	0.18	422
2026	0.61	0.57	5.53	24.3	0.04	0.09	0.69	0.78	0.09	0.24	0.33	—	4,851	4,851	0.20	0.12	0.90	4,892
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.52	0.52	0.12	1.02	< 0.005	0.01	0.03	0.04	0.01	0.01	0.02	—	68.4	68.4	< 0.005	< 0.005	0.03	69.8
2026	0.11	0.10	1.01	4.44	0.01	0.02	0.13	0.14	0.02	0.04	0.06	—	803	803	0.03	0.02	0.15	810

2.4. Operations 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.22	0.21	0.02	0.54	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	0.00	254	254	0.01	< 0.005	171	426
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.17	0.17	0.02	0.23	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	0.00	250	250	0.01	< 0.005	171	422
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.18	0.17	0.01	0.20	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	0.00	221	221	0.01	< 0.005	171	392
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.03	0.03	< 0.005	0.04	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.00	36.5	36.5	< 0.005	< 0.005	28.2	64.9

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.02	0.02	0.02	0.26	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	44.8	44.8	< 0.005	< 0.005	0.17	45.4
Area	0.19	0.19	< 0.005	0.28	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.14	1.14	< 0.005	< 0.005	—	1.15
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	208	208	0.01	< 0.005	—	209
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	171	171
Total	0.22	0.21	0.02	0.54	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	0.00	254	254	0.01	< 0.005	171	426
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.02	0.02	0.02	0.23	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	42.3	42.3	< 0.005	< 0.005	< 0.005	42.8
Area	0.15	0.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	208	208	0.01	< 0.005	—	209
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	171	171
Total	0.17	0.17	0.02	0.23	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	0.00	250	250	0.01	< 0.005	171	422
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	0.01	0.01	0.07	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	12.1	12.1	< 0.005	< 0.005	0.02	12.3
Area	0.17	0.17	< 0.005	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.56	0.56	< 0.005	< 0.005	—	0.57
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	208	208	0.01	< 0.005	—	209
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	171	171
Total	0.18	0.17	0.01	0.20	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	0.00	221	221	0.01	< 0.005	171	392
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.01	2.01	< 0.005	< 0.005	< 0.005	2.04
Area	0.03	0.03	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.09	0.09	< 0.005	< 0.005	—	0.09
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	34.4	34.4	< 0.005	< 0.005	—	34.5
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28.2	28.2
Total	0.03	0.03	< 0.005	0.04	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.00	36.5	36.5	< 0.005	< 0.005	28.2	64.9

3. Construction Emissions Details

3.1. Demolition (2025) - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	34.2	34.0	3.06	55.8	0.02	0.61	—	0.61	0.46	—	0.46	—	1,367	1,367	0.06	0.01	—	1,372
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.81	2.80	0.25	4.59	< 0.005	0.05	—	0.05	0.04	—	0.04	—	112	112	< 0.005	< 0.005	—	113

Demoliti	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.51	0.51	0.05	0.84	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.6	18.6	< 0.005	< 0.005	—	18.7
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.49	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	108	108	0.01	< 0.005	0.01	109
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	0.01	0.98	0.36	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	719	719	0.04	0.11	0.04	754
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.92	8.92	< 0.005	< 0.005	0.02	9.05
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	59.1	59.1	< 0.005	0.01	0.06	62.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.48	1.48	< 0.005	< 0.005	< 0.005	1.50
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.78	9.78	< 0.005	< 0.005	0.01	10.3

3.3. Site Preparation (2025) - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.42	0.42	6.20	24.0	0.04	0.07	—	0.07	0.07	—	0.07	—	4,013	4,013	0.16	0.03	—	4,027
Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.21	0.80	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	—	134
Dust From Material Movement	—	—	—	—	—	—	0.09	0.09	—	0.04	0.04	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	0.04	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.1	22.1	< 0.005	< 0.005	—	22.2
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.21	0.18	2.11	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	466	466	0.03	0.02	0.05	472
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.19	0.05	3.42	1.25	0.02	0.05	0.65	0.70	0.05	0.18	0.22	—	2,516	2,516	0.14	0.40	0.14	2,637
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	15.6	15.6	< 0.005	< 0.005	0.03	15.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.11	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	83.7	83.7	< 0.005	0.01	0.08	87.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.59	2.59	< 0.005	< 0.005	< 0.005	2.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	13.9	13.9	< 0.005	< 0.005	0.01	14.5

3.5. Site Preparation (2026) - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.42	0.42	6.20	24.0	0.04	0.07	—	0.07	0.07	—	0.07	—	4,013	4,013	0.16	0.03	—	4,027
Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.22	0.84	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	141	141	0.01	< 0.005	—	142
Dust From Material Movement	—	—	—	—	—	—	0.10	0.10	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.04	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23.4	23.4	< 0.005	< 0.005	—	23.5

Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.20	0.19	0.16	1.98	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	456	456	0.02	0.02	0.04	463
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.18	0.05	3.29	1.23	0.02	0.05	0.65	0.70	0.03	0.18	0.21	—	2,463	2,463	0.12	0.40	0.13	2,584
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	16.2	16.2	< 0.005	< 0.005	0.03	16.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.12	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	86.7	86.7	< 0.005	0.01	0.08	91.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.69	2.69	< 0.005	< 0.005	< 0.005	2.73
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	14.4	14.4	< 0.005	< 0.005	0.01	15.1

3.7. Grading (2026) - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.42	0.42	6.20	24.0	0.04	0.07	—	0.07	0.07	—	0.07	—	4,013	4,013	0.16	0.03	—	4,027
Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.42	1.64	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	275	275	0.01	< 0.005	—	276
Dust From Material Movement	—	—	—	—	—	—	0.19	0.19	—	0.09	0.09	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.08	0.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	45.5	45.5	< 0.005	< 0.005	—	45.7
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.02	0.02	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.20	0.19	0.16	1.98	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	456	456	0.02	0.02	0.04	463
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.18	0.05	3.29	1.23	0.02	0.05	0.65	0.70	0.03	0.18	0.21	—	2,463	2,463	0.12	0.40	0.13	2,584
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	31.5	31.5	< 0.005	< 0.005	0.05	32.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.22	0.08	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	169	169	0.01	0.03	0.15	177
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.22	5.22	< 0.005	< 0.005	0.01	5.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.9	27.9	< 0.005	< 0.005	0.03	29.3

3.9. Retaining Wall (2026) - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.69	0.69	9.49	38.1	0.06	0.12	—	0.12	0.12	—	0.12	—	6,492	6,492	0.26	0.05	—	6,514
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.69	0.69	9.49	38.1	0.06	0.12	—	0.12	0.12	—	0.12	—	6,492	6,492	0.26	0.05	—	6,514
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.06	0.78	3.13	0.01	0.01	—	0.01	0.01	—	0.01	—	534	534	0.02	< 0.005	—	535
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.14	0.57	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	88.3	88.3	< 0.005	< 0.005	—	88.6
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.56	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	121	121	0.01	< 0.005	0.42	123
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.03	0.01	0.45	0.17	< 0.005	0.01	0.09	0.10	< 0.005	0.03	0.03	—	352	352	0.02	0.06	0.73	370
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.50	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	114	114	0.01	< 0.005	0.01	116
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.03	0.01	0.47	0.18	< 0.005	0.01	0.09	0.10	< 0.005	0.03	0.03	—	352	352	0.02	0.06	0.02	369
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.46	9.46	< 0.005	< 0.005	0.01	9.60
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	28.9	28.9	< 0.005	< 0.005	0.03	30.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.57	1.57	< 0.005	< 0.005	< 0.005	1.59
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.79	4.79	< 0.005	< 0.005	< 0.005	5.03

3.11. Set Modules, Inverters, & Switchgear (2026) - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.79	0.79	7.15	41.0	0.07	0.15	—	0.15	0.15	—	0.15	—	7,861	7,861	0.32	0.06	—	7,888
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.09	0.78	4.50	0.01	0.02	—	0.02	0.02	—	0.02	—	861	861	0.03	0.01	—	864
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.14	0.82	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	143	143	0.01	< 0.005	—	143
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.19	0.14	2.25	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	483	483	0.02	0.02	1.69	491
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.03	0.01	0.45	0.17	< 0.005	0.01	0.09	0.10	< 0.005	0.03	0.03	—	352	352	0.02	0.06	0.73	370
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	50.5	50.5	< 0.005	< 0.005	0.08	51.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	38.5	38.5	< 0.005	0.01	0.03	40.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.36	8.36	< 0.005	< 0.005	0.01	8.48
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.38	6.38	< 0.005	< 0.005	0.01	6.70

3.13. Electrical Wire Installation/Finish Grading (2026) - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.64	0.64	6.37	36.8	0.06	0.12	—	0.12	0.12	—	0.12	—	6,254	6,254	0.25	0.05	—	6,276
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.64	0.64	6.37	36.8	0.06	0.12	—	0.12	0.12	—	0.12	—	6,254	6,254	0.25	0.05	—	6,276
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.07	0.70	4.04	0.01	0.01	—	0.01	0.01	—	0.01	—	685	685	0.03	0.01	—	688
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.13	0.74	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	113	113	< 0.005	< 0.005	—	114
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.18	0.14	2.20	0.00	0.00	0.43	0.43	0.00	0.10	0.10	—	474	474	0.02	0.02	1.66	481
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.03	0.01	0.45	0.17	< 0.005	0.01	0.09	0.10	< 0.005	0.03	0.03	—	352	352	0.02	0.06	0.73	370
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.20	0.18	0.16	1.94	0.00	0.00	0.43	0.43	0.00	0.10	0.10	—	448	448	0.02	0.02	0.04	454
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.03	0.01	0.47	0.18	< 0.005	0.01	0.09	0.10	< 0.005	0.03	0.03	—	352	352	0.02	0.06	0.02	369
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	49.5	49.5	< 0.005	< 0.005	0.08	50.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	38.5	38.5	< 0.005	0.01	0.03	40.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.20	8.20	< 0.005	< 0.005	0.01	8.32
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.38	6.38	< 0.005	< 0.005	0.01	6.70

3.15. Commissioning & Testing (2026) - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.16	2.50	7.91	0.02	0.03	—	0.03	0.03	—	0.03	—	1,450	1,450	0.06	0.01	—	1,455
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.41	1.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	238	238	0.01	< 0.005	—	239
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.07	0.24	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	39.5	39.5	< 0.005	< 0.005	—	39.6
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.19	0.17	2.02	0.00	0.00	0.45	0.45	0.00	0.11	0.11	—	465	465	0.02	0.02	0.04	471
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.03	0.01	0.47	0.18	< 0.005	0.01	0.09	0.10	< 0.005	0.03	0.03	—	352	352	0.02	0.06	0.02	369
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.34	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	77.2	77.2	< 0.005	< 0.005	0.12	78.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	—	57.8	57.8	< 0.005	0.01	0.05	60.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12.8	12.8	< 0.005	< 0.005	0.02	13.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.57	9.57	< 0.005	< 0.005	0.01	10.1

3.17. Foundations and Equipment (2026) - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.20	1.15	10.9	53.8	0.10	0.24	—	0.24	0.23	—	0.23	—	9,846	9,846	0.40	0.08	—	9,880
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.16	1.49	7.37	0.01	0.03	—	0.03	0.03	—	0.03	—	1,349	1,349	0.05	0.01	—	1,353
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.27	1.34	< 0.005	0.01	—	0.01	0.01	—	0.01	—	223	223	0.01	< 0.005	—	224
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.19	0.15	2.29	0.00	0.00	0.45	0.45	0.00	0.11	0.11	—	493	493	0.02	0.02	1.72	500
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.03	0.01	0.45	0.17	< 0.005	0.01	0.09	0.10	< 0.005	0.03	0.03	—	352	352	0.02	0.06	0.73	370
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.28	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	64.3	64.3	< 0.005	< 0.005	0.10	65.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	48.2	48.2	< 0.005	0.01	0.04	50.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.6	10.6	< 0.005	< 0.005	0.02	10.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.98	7.98	< 0.005	< 0.005	0.01	8.38

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	208	208	0.01	< 0.005	—	209
Total	—	—	—	—	—	—	—	—	—	—	—	—	208	208	0.01	< 0.005	—	209
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse-No	—	—	—	—	—	—	—	—	—	—	—	—	208	208	0.01	< 0.005	—	209
Total	—	—	—	—	—	—	—	—	—	—	—	—	208	208	0.01	< 0.005	—	209
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	34.4	34.4	< 0.005	< 0.005	—	34.5
Total	—	—	—	—	—	—	—	—	—	—	—	—	34.4	34.4	< 0.005	< 0.005	—	34.5

4.2.3. Natural Gas Emissions By Land Use - 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refriger Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	0.05	< 0.005	0.28	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.14	1.14	< 0.005	< 0.005	—	1.15
Total	0.19	0.19	< 0.005	0.28	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.14	1.14	< 0.005	< 0.005	—	1.15
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.15	0.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.09	0.09	< 0.005	< 0.005	—	0.09
Total	0.03	0.03	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.09	0.09	< 0.005	< 0.005	—	0.09

4.4. Water Emissions by Land Use

4.4.1. 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.5. Waste Emissions by Land Use

4.5.1. 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

4.6. Refrigerant Emissions by Land Use

4.6.1. 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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	171	171
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	171	171
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	171	171
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	171	171
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28.2	28.2
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28.2	28.2

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	BCO2	NBCO2	CO2T	CH4	N2O	R	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	BCO2	NBCO2	CO2T	CH4	N2O	R	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	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Demolition	Demolition	11/3/2025	12/13/2025	5.00	30.0	—
Site Preparation	Site Preparation	12/15/2025	1/18/2026	5.00	25.0	—
Grading	Grading	1/19/2026	2/22/2026	5.00	25.0	—
Retaining Wall	Building Construction	2/23/2026	4/3/2026	5.00	30.0	—
Set Modules, Inverters, & Switchgear	Building Construction	6/13/2026	8/7/2026	5.00	40.0	—
Electrical Wire Installation/Finish Grading	Building Construction	8/8/2026	10/2/2026	5.00	40.0	—
Commissioning & Testing	Building Construction	10/3/2026	12/25/2026	5.00	60.0	—
Foundations and Equipment	Paving	4/4/2026	6/12/2026	5.00	50.0	—

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
Demolition	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.00	6.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.00	33.0	0.73
Demolition	Crushing/Proc. Equipment	Gasoline	Average	1.00	8.00	12.0	0.85
Demolition	Dumpers/Tenders	Diesel	Tier 4 Final	1.00	8.00	16.0	0.38
Demolition	Excavators	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Demolition	Forklifts	Diesel	Tier 4 Final	1.00	8.00	82.0	0.20
Demolition	Generator Sets	Electric	Average	1.00	8.00	14.0	0.74
Demolition	Pumps	Diesel	Tier 4 Final	1.00	8.00	11.0	0.74
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	8.00	84.0	0.37

Site Preparation	Plate Compactors	Diesel	Tier 4 Final	1.00	8.00	8.00	0.43
Site Preparation	Air Compressors	Diesel	Tier 4 Final	2.00	8.00	37.0	0.48
Site Preparation	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Site Preparation	Dumpers/Tenders	Diesel	Tier 4 Final	1.00	8.00	16.0	0.38
Site Preparation	Excavators	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Site Preparation	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Site Preparation	Generator Sets	Electric	Average	1.00	8.00	14.0	0.74
Site Preparation	Pumps	Diesel	Tier 4 Final	1.00	8.00	11.0	0.74
Site Preparation	Rollers	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Site Preparation	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	8.00	36.0	0.46
Site Preparation	Trenchers	Diesel	Tier 4 Final	1.00	8.00	40.0	0.50
Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	8.00	84.0	0.37
Grading	Plate Compactors	Diesel	Tier 4 Final	1.00	8.00	8.00	0.43
Grading	Air Compressors	Diesel	Tier 4 Final	2.00	8.00	37.0	0.48
Grading	Dumpers/Tenders	Diesel	Tier 4 Final	1.00	8.00	16.0	0.38
Grading	Excavators	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Grading	Generator Sets	Electric	Average	1.00	8.00	14.0	0.74
Grading	Pumps	Diesel	Tier 4 Final	1.00	8.00	11.0	0.74
Grading	Rollers	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Grading	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	8.00	36.0	0.46
Grading	Trenchers	Diesel	Tier 4 Final	1.00	8.00	40.0	0.50
Retaining Wall	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	8.00	84.0	0.37
Retaining Wall	Cement and Mortar Mixers	Diesel	Tier 4 Final	1.00	8.00	10.0	0.56
Retaining Wall	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.00	33.0	0.73

Retaining Wall	Air Compressors	Diesel	Tier 4 Final	2.00	8.00	37.0	0.48
Retaining Wall	Cranes	Diesel	Tier 4 Final	3.00	8.00	367	0.29
Retaining Wall	Dumpers/Tenders	Diesel	Tier 4 Final	1.00	8.00	16.0	0.38
Retaining Wall	Excavators	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Retaining Wall	Forklifts	Diesel	Tier 4 Final	1.00	8.00	82.0	0.20
Retaining Wall	Rubber Tired Loaders	Diesel	Tier 4 Final	1.00	8.00	150	0.36
Retaining Wall	Skid Steer Loaders	Diesel	Tier 4 Final	1.00	8.00	71.0	0.37
Retaining Wall	Generator Sets	Electric	Average	2.00	8.00	14.0	0.74
Retaining Wall	Pumps	Diesel	Tier 4 Final	1.00	8.00	11.0	0.74
Retaining Wall	Rough Terrain Forklifts	Diesel	Tier 4 Final	1.00	8.00	96.0	0.40
Retaining Wall	Skid Steer Loaders	Diesel	Tier 4 Final	1.00	8.00	71.0	0.37
Retaining Wall	Welders	Diesel	Tier 4 Final	1.00	8.00	46.0	0.45
Set Modules, Inverters, & Switchgear	Air Compressors	Diesel	Tier 4 Final	1.00	8.00	37.0	0.48
Set Modules, Inverters, & Switchgear	Cranes	Diesel	Tier 4 Final	2.00	8.00	367	0.29
Set Modules, Inverters, & Switchgear	Rubber Tired Dozers	Diesel	Tier 4 Final	2.00	8.00	367	0.40
Set Modules, Inverters, & Switchgear	Off-Highway Trucks	Diesel	Tier 4 Final	2.00	6.00	376	0.38
Set Modules, Inverters, & Switchgear	Generator Sets	Electric	Average	2.00	8.00	14.0	0.74
Set Modules, Inverters, & Switchgear	Rough Terrain Forklifts	Diesel	Tier 4 Final	1.00	8.00	96.0	0.40
Set Modules, Inverters, & Switchgear	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	8.00	36.0	0.46

Set Modules, Inverters, & Switchgear	Welders	Diesel	Tier 4 Final	2.00	8.00	46.0	0.45
Electrical Wire Installation/Finish Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.00	8.00	84.0	0.37
Electrical Wire Installation/Finish Grading	Air Compressors	Diesel	Tier 4 Final	1.00	8.00	37.0	0.48
Electrical Wire Installation/Finish Grading	Cranes	Diesel	Tier 4 Final	1.00	8.00	367	0.29
Electrical Wire Installation/Finish Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Electrical Wire Installation/Finish Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Electrical Wire Installation/Finish Grading	Off-Highway Trucks	Diesel	Tier 4 Final	1.00	6.00	376	0.38
Electrical Wire Installation/Finish Grading	Pavers	Diesel	Tier 4 Final	1.00	8.00	81.0	0.42
Electrical Wire Installation/Finish Grading	Paving Equipment	Diesel	Tier 4 Final	1.00	8.00	89.0	0.36
Electrical Wire Installation/Finish Grading	Generator Sets	Electric	Average	2.00	8.00	14.0	0.74
Electrical Wire Installation/Finish Grading	Rough Terrain Forklifts	Diesel	Tier 4 Final	1.00	8.00	96.0	0.40
Electrical Wire Installation/Finish Grading	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	8.00	36.0	0.46

Electrical Wire Installation/Finish Grading	Welders	Diesel	Tier 4 Final	2.00	8.00	46.0	0.45
Commissioning & Testing	Plate Compactors	Diesel	Tier 4 Final	1.00	8.00	8.00	0.43
Commissioning & Testing	Off-Highway Trucks	Diesel	Tier 4 Final	1.00	6.00	376	0.38
Commissioning & Testing	Generator Sets	Electric	Average	1.00	8.00	14.0	0.74
Commissioning & Testing	Welders	Diesel	Tier 4 Final	2.00	8.00	46.0	0.45
Foundations and Equipment	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	8.00	84.0	0.37
Foundations and Equipment	Bore/Drill Rigs	Diesel	Tier 4 Final	1.00	8.00	83.0	0.50
Foundations and Equipment	Cement and Mortar Mixers	Diesel	Tier 4 Final	1.00	8.00	10.0	0.56
Foundations and Equipment	Plate Compactors	Diesel	Tier 4 Final	1.00	8.00	8.00	0.43
Foundations and Equipment	Air Compressors	Diesel	Tier 4 Final	2.00	8.00	37.0	0.48
Foundations and Equipment	Cranes	Diesel	Tier 4 Final	3.00	8.00	367	0.29
Foundations and Equipment	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Foundations and Equipment	Dumpers/Tenders	Diesel	Tier 4 Final	1.00	8.00	16.0	0.38
Foundations and Equipment	Excavators	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Foundations and Equipment	Off-Highway Trucks	Diesel	Tier 4 Final	2.00	6.00	376	0.38
Foundations and Equipment	Generator Sets	Diesel	Average	2.00	8.00	14.0	0.74
Foundations and Equipment	Pumps	Diesel	Tier 4 Final	1.00	8.00	11.0	0.74

Foundations and Equipment	Rough Terrain Forklifts	Diesel	Tier 4 Final	2.00	8.00	96.0	0.40
Foundations and Equipment	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	8.00	36.0	0.46
Foundations and Equipment	Welders	Diesel	Tier 4 Final	2.00	8.00	46.0	0.45

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.0	12.0	LDA,LDT1,LDT2
Demolition	Vendor	0.00	7.63	HHDT,MHDT
Demolition	Hauling	10.0	20.0	HHDT
Demolition	Onsite truck	0.00	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	52.0	12.0	LDA,LDT1,LDT2
Site Preparation	Vendor	0.00	7.63	HHDT,MHDT
Site Preparation	Hauling	35.0	20.0	HHDT
Site Preparation	Onsite truck	0.00	—	HHDT
Grading	—	—	—	—
Grading	Worker	52.0	12.0	LDA,LDT1,LDT2
Grading	Vendor	0.00	7.63	HHDT,MHDT
Grading	Hauling	35.0	20.0	HHDT
Grading	Onsite truck	0.00	—	HHDT
Retaining Wall	—	—	—	—
Retaining Wall	Worker	13.0	12.0	LDA,LDT1,LDT2
Retaining Wall	Vendor	0.00	7.63	HHDT,MHDT

Retaining Wall	Hauling	5.00	20.0	HHDT
Retaining Wall	Onsite truck	0.00	—	HHDT
Foundations and Equipment	—	—	—	—
Foundations and Equipment	Worker	53.0	12.0	LDA,LDT1,LDT2
Foundations and Equipment	Vendor	0.00	7.63	HHDT,MHDT
Foundations and Equipment	Hauling	5.00	20.0	HHDT
Foundations and Equipment	Onsite truck	0.00	—	HHDT
Set Modules, Inverters, & Switchgear	—	—	—	—
Set Modules, Inverters, & Switchgear	Worker	52.0	12.0	LDA,LDT1,LDT2
Set Modules, Inverters, & Switchgear	Vendor	0.00	7.63	HHDT,MHDT
Set Modules, Inverters, & Switchgear	Hauling	5.00	20.0	HHDT
Set Modules, Inverters, & Switchgear	Onsite truck	0.00	—	HHDT
Electrical Wire Installation/Finish Grading	—	—	—	—
Electrical Wire Installation/Finish Grading	Worker	51.0	12.0	LDA,LDT1,LDT2
Electrical Wire Installation/Finish Grading	Vendor	0.00	7.63	HHDT,MHDT
Electrical Wire Installation/Finish Grading	Hauling	5.00	20.0	HHDT
Electrical Wire Installation/Finish Grading	Onsite truck	0.00	—	HHDT
Commissioning & Testing	—	—	—	—
Commissioning & Testing	Worker	53.0	12.0	LDA,LDT1,LDT2
Commissioning & Testing	Vendor	0.00	7.63	HHDT,MHDT
Commissioning & Testing	Hauling	5.00	20.0	HHDT
Commissioning & Testing	Onsite truck	0.00	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

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 (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	0.00	—
Site Preparation	0.00	0.00	25.0	0.00	—
Grading	0.00	0.00	31.3	0.00	—
Foundations and Equipment	0.00	0.00	0.00	0.00	0.00

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Refrigerated Warehouse-No Rail	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	124	589	0.03	< 0.005
2026	556	589	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	4.00	0.00	0.00	416	54.3	0.00	0.00	5,650

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	9,600	3,200	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Refrigerated Warehouse-No Rail	128,851	589	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Refrigerated Warehouse-No Rail	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Refrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

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

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

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	15.7	annual days of extreme heat
Extreme Precipitation	5.10	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	8.89	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 ¾ 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	1	0	0	N/A
Wildfire	1	0	0	N/A

Flooding	0	0	0	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 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	1	1	1	2
Wildfire	1	1	1	2
Flooding	1	1	1	2
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	47.4
AQ-PM	15.0
AQ-DPM	32.7
Drinking Water	47.8
Lead Risk Housing	10.4
Pesticides	45.1
Toxic Releases	12.9
Traffic	34.3
Effect Indicators	—
CleanUp Sites	77.0
Groundwater	89.2
Haz Waste Facilities/Generators	92.7
Impaired Water Bodies	98.1
Solid Waste	98.1
Sensitive Population	—
Asthma	10.1
Cardio-vascular	50.9
Low Birth Weights	13.5
Socioeconomic Factor Indicators	—
Education	44.6
Housing	20.3
Linguistic	9.46
Poverty	56.8
Unemployment	4.23

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	43.19260875
Employed	33.54292314
Median HI	43.89837033
Education	—
Bachelor's or higher	55.60118055
High school enrollment	100
Preschool enrollment	27.28089311
Transportation	—
Auto Access	52.9449506
Active commuting	35.67303991
Social	—
2-parent households	10.17579879
Voting	77.73643013
Neighborhood	—
Alcohol availability	64.09598358
Park access	10.9842166
Retail density	67.71461568
Supermarket access	49.05684589
Tree canopy	40.74169126
Housing	—
Homeownership	70.80713461
Housing habitability	77.96740665
Low-inc homeowner severe housing cost burden	27.81983832
Low-inc renter severe housing cost burden	82.63826511

Uncrowded housing	64.30129603
Health Outcomes	—
Insured adults	59.70742974
Arthritis	9.5
Asthma ER Admissions	89.2
High Blood Pressure	35.9
Cancer (excluding skin)	18.5
Asthma	34.7
Coronary Heart Disease	12.2
Chronic Obstructive Pulmonary Disease	12.3
Diagnosed Diabetes	34.4
Life Expectancy at Birth	48.8
Cognitively Disabled	4.2
Physically Disabled	33.4
Heart Attack ER Admissions	81.6
Mental Health Not Good	38.2
Chronic Kidney Disease	27.1
Obesity	47.2
Pedestrian Injuries	61.2
Physical Health Not Good	36.4
Stroke	22.5
Health Risk Behaviors	—
Binge Drinking	40.3
Current Smoker	38.5
No Leisure Time for Physical Activity	43.7
Climate Change Exposures	—
Wildfire Risk	22.5
SLR Inundation Area	0.0

Children	67.0
Elderly	38.5
English Speaking	79.4
Foreign-born	34.7
Outdoor Workers	37.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	62.4
Traffic Density	65.0
Traffic Access	46.3
Other Indices	—
Hardship	41.9
Other Decision Support	—
2016 Voting	76.5

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	30.0
Healthy Places Index Score for Project Location (b)	43.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
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

Screen	Justification
Land Use	Information provided to Rincon.
Construction: Construction Phases	Information provided to Rincon.
Construction: Off-Road Equipment	Information provided to Rincon.
Construction: Trips and VMT	Information provided to Rincon.
Operations: Vehicle Data	Information provided to Rincon.
Operations: Water and Waste Water	Information provided to Rincon.
Operations: Solid Waste	Information provided to Rincon.
Operations: Refrigerants	Information provided to Rincon.
Operations: Fleet Mix	Assumed pick up trucks used by workers.
Operations: Energy Use	There will be no natural gas.
Construction: Dust From Material Movement	Hauling truck trips during demolition, site preparation, and grading based on maximum hauling trips per day provided by applicant, not based on the CalEEMod import/export or demolition amounts. Information provided by applicant were greater than the default values provided by CalEEMod using the import/export values.

Appendix C

Climate Action Plan Consistency Checklist

Climate Action Plan Consistency Review Checklist

Project # _____

Introduction

The City of Escondido ("City") adopted an updated Climate Action Plan ("CAP") on March 10, 2021 by Resolution No. 2021-37. The CAP outlines strategies and measures that the City will undertake to achieve its proportional share of State greenhouse gas ("GHG") emissions reduction targets. The CAP's strategies and measures are designed to reduce GHG emissions for build-out under the General Plan. The CAP does so by (1) calculating a baseline GHG emissions level as of 2012; and (2) estimating future GHG emissions under a business as usual standard; and (3) implementing state mandated GHG reduction targets. Measures to reduce GHG emissions for projects with land use consistent with the City's General Plan are found in the CAP.

Analysis of GHG emissions and potential climate change impacts from new development is required under CEQA. The purpose of the CAP Consistency Checklist ("Checklist") is to provide a streamlined review process for proposed development projects that trigger environmental review pursuant to the California Environmental Quality Act ("CEQA").

The City's CAP is a qualified GHG emissions reduction plan in accordance with State CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of a CAP. Projects that are consistent with the General Plan and implement applicable CAP GHG reduction measures may incorporate by reference the CAP's cumulative GHG analysis. Conversely, projects that are consistent with the General Plan, but do not implement CAP GHG reduction measures, as well as General Plan Amendments and Annexations that increase emissions beyond CAP projections — will require a project-level GHG analysis.

The purpose of this Checklist is to implement GHG reduction measures from the CAP and determine if development would demonstrate consistency with the CAP's assumptions for implementation. Projects that are consistent with the CAP, as determined through the use of this Checklist, may rely on the CAP for the cumulative impact analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions, incorporation of the measures in this Checklist to the extent applicable, and demonstration of consistency with a VMT threshold currently in development by the City. Cumulative GHG impacts could be significant for any project that is not consistent with the CAP.

This Checklist may be updated periodically to incorporate new GHG reduction techniques, include reference to or requirements of new ordinances adopted by the City, or to comply with later amendments to the CAP or local, State, or federal law. Comprehensive updates to this Checklist will be coordinated with each CAP update. Administrative updates to the Checklist may occur regularly, as necessary for the

purpose of keeping the Checklist up-to-date and implementable. Updates to the CAP Checklist associated with an update to the City's CAP would require City Council approval and shall comply with CEQA.

Applicability and Procedures

This Checklist is required only for discretionary projects[1] that are subject to and not exempt from CEQA. Projects that are exempt from CEQA are deemed to be consistent with the City's CAP, and no further review is necessary, with the exception of a Class 32 "In-Fill Development Projects" categorical exemption (State CEQA Guidelines Section 15332), for which projects are required to demonstrate consistency with the CAP through this Checklist.

General procedures for Checklist compliance and review are described below. Specific guidance is also provided under each of the questions under Steps 1 and 2 of the Checklist.

- The City's Community Development Department reviews development applications relative to environmental review requirements under Article 47 of the Escondido Zoning Code. These environmental quality regulations implement CEQA and State CEQA Guidelines by applying the provisions and procedures contained in CEQA to development projects proposed within the City.

- The project proponent or applicant must demonstrate if the project request is CAP compliant to the satisfaction of the Director of Community Development. In doing so, the project proponent or applicant must provide written documentation to demonstrate the applicability of the Checklist; and provide substantial evidence that demonstrates how the proposed project would implement each applicable Checklist requirement described herein.

- If a question in the Checklist is deemed not applicable (N/A) to a project, written documentation and substantial evidence supporting that conclusion shall be provided to the satisfaction of the Director of Community Development.

- Development projects requiring discretionary review that cannot demonstrate consistency with the CAP using this Checklist shall prepare a separate, project-level GHG analysis as part of the CEQA document prepared for the project and may be required to prepare an Environment Impact Report ("EIR").

- The specific applicable requirements outlined in the Checklist shall be required as conditions of project approval for CAP compliant projects with streamlined GHG emissions assessments.

[1] In this context, a project is any action that meets the definition of a "Project" in Section 15378 of the State CEQA Guidelines.

Application Information

Contact Information

Project No. and Name: _____

Property Address and APN: _____

Applicant Name and Co.: _____

Contact Phone: _____ Contact Email: _____

Was a consultant retained to complete this checklist? ☐ Yes ☐ No
If Yes, complete the following:

Consultant Name: _____ Contact Phone: _____

Company Name: _____ Contact Email: _____

Project Information

1. What is the size of the project site (acres)? _____

2. Identify all applicable proposed land uses:

☐ Residential (indicate # of single-family dwelling units): _____

☐ Residential (indicate # of multi-family dwelling units): _____

☐ Commercial (indicate total square footage): _____

☐ Industrial (indicate total square footage): _____

☐ Other (describe use and indicate size): _____

3. Provide a description of the project proposed. This description should match the basic project description used for the CEQA document. The description may be attached to the Checklist if there are space constraints.

_____

_____

_____

_____

_____

_____

_____

Step 1: Land Use Consistency

The first step in this section evaluates a project's GHG emissions consistent with the City's *Guidance to Demonstrating Consistency with the City of Escondido Climate Action Plan for Discretionary Projects Subject to CEQA* (Guidance Document). A summary of the process for determining the required level of analysis for these projects is provided in Figure 1, "Require Level of Analysis Flowchart," provided in the Guidance Document.

The CAP contains in-City GHG projections for 2020, 2030, and 2035. Measures to reduce GHG emissions for projects with land use consistent with the General Plan are found in the CAP. If any one of these calculations is erroneous, the CAP fails to accomplish this purpose. Therefore, the first step of this checklist is to determine if the project's anticipated growth would have been included in the CAP's business-as-usual land use and activity projections. This section allows the City to determine a project's consistency with the land use assumptions used in the CAP. Projects that are consistent with the General Plan may incorporate by reference the CAP's cumulative GHG analysis.

For projects that are determined to be consistent with CAP projections, the next step is to identify if the project would be estimated to emit fewer than 500 metric tons of carbon dioxide equivalent ($MTCO_2e$) annually. If found to emit fewer than 500 $MTCO_2e$, a project would not contribute considerably to cumulative climate change impacts as stated in the City's Guidance Document. Therefore, these projects would be considered consistent with the CAP.

Additionally, at the time of this CAP Checklist preparation, the City is in the process of developing screening thresholds for vehicle miles traveled (VMT) consistent with State legislation. . Thus, projects that would be below both the GHG and VMT screening level thresholds would not be anticipated to result in cumulative GHG impacts and conflict with the City's ability to achieve its GHG reduction targets.

Step 1: Land Use Consistency		
Checklist Item (Check the appropriate box and provide an explanation and supporting documentation for your answer)	**Yes**	**No**
1. Is the proposed project consistent with the City's existing General Plan land use designation? If **"Yes"**, proceed to Question 3 of Step 1. If **"No"**, proceed to Question 2 of Step 1.	☐	☐
2. If the proposed project is not consistent with the existing General Plan land use designation, does the project include a General Plan Amendment that would generate GHG emissions equal to or less than estimated emissions generated under the existing designation? If **"Yes",** provide estimated project emissions under both existing and proposed designation(s) for comparison and proceed to Question 3 of Step 1. If **"No",** the project's GHG impact is potentially significant, and a GHG analysis must be prepared in accordance with the City's Guidance Document and applicable CEQA Guidelines. The project would not be eligible for GHG streamlining provisions of the CAP. The project must incorporate each of the measures identified in Step 2 to mitigate cumulative GHG emissions impacts unless a measure is determined to be infeasible in accordance with CEQA Guidelines Section 15091. Proceed and complete a project specific GHG analysis, and Step 2 of the Checklist.	☐	☐
3. The size and type of projects listed below would emit fewer than 500 $MTCO_2e$ per year. Based on this threshold, does the proposed project exceed these characteristics? ▪ Single-Family Housing[2]: 36 dwelling units ▪ Multi-Family Housing: 55 dwelling units ▪ Office: 43,000 square feet ▪ Commercial Space: 20,000 square feet ▪ Regional Shopping Center: 18,000 square feet ▪ Restaurant: 6,500 square feet ▪ General Light Industrial: 58,000 square feet ▪ Warehouse (Unrefrigerated): 233,000 square feet ▪ Warehouse (Refrigerated): 62,000 square feet ▪ Mixed-Use: See the City's Guidance Document[3] for methods to estimate mixed-use development thresholds ▪ Other: For project types not listed in this section the need for GHG analysis and mitigation will be made on a project-specific basis, considering the 500 $MTCO_2e$ per year screening threshold. If **"Yes",** proceed to Step 2. If **"No",** in accordance with the City's CAP screening criteria, the project's GHG impact is less than significant and is not subject to the measures of the CAP.	☐	☐

[2] Single-Family Housing developments are defined as single-family detached homes on individual lots. All other residential use types (e.g. single-family attached, condo/townhouse, apartment) should be considered "Multi-Family Housing" for the purposes of comparing a project to the screening thresholds.

[3] *Guidance for Demonstrating Consistency with the City of Escondido Climate Action Plan for discretionary Projects Subject to CEQA*, available at https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/ClimateActionPlan/Final/Escondido_ThresholdsMemoFinal3.10.2021.pdf

Step 2: CAP Measures Consistency

The second step of CAP consistency review is to evaluate a project's consistency with the applicable strategies and measures of the CAP. Each Checklist item is associated with specific GHG reduction measures in the City's CAP.

Step 2: CAP Measures Consistency			
Checklist Item (Check the appropriate box and provide an explanation for your answer. Please use additional sheets if necessary)	**Yes**	**No**	**N/A**
Parking and Transportation Demand Management			
1. Electric Vehicle Charging Stations (Measures T-1.3 & T-1.4) All Projects: Will the project install electric vehicle charging stations (EVCSs) consistent with the following requirements: • Comply with the most recently updated version of the California Building Energy Efficiency Standards (Title 24, Part 6)? • For multi-family residential and commercial (i.e. office and retail commercial) projects, will the project install electric vehicle charging stations at a minimum of 10 percent of the total parking spaces provided? • For single-family residential projects, will the project install at least one EVCS in each new single-family home? Check "N/A" only if the project is not proposing any parking; or if the project does not propose any construction activities.	☐	☐	☐
Please substantiate how the project satisfies question 1:			
2. Pedestrian Infrastructure (Measure T-3.2) All Projects: If the following conditions are met, would the project pay its fair-share contribution or fully install pedestrian infrastructure improvements? ☐ The project frontage is located along a roadway for which pedestrian improvements are identified in the City's Street Design Manual, Pedestrian Master Plan, Trail Master Plan, or Safe Routes to School and Transit Plans; ☐ The proposed project would include site design amenities with pedestrian access points from the existing, identified roadway; and, ☐ The identified pedestrian improvements have not yet been installed. Or if they have been installed, the infrastructure is being redesigned, upgraded, and/or maintained to promote universal access. Check "N/A" only if the project does not propose any construction activities.	☐	☐	☐

Please substantiate how the project satisfies question 2:			
3. Transportation Demand Management and Transit (Measures T-3.4 and T-3.6) Single-Family Projects: N/A Multi-Family Residential Projects: If the project is located in the Downtown Specific Plan area and is proposing a reduction in over 15 percent of the required amount of on-site vehicular parking, would the project implement the following policies or programs? • The project would provide six-month transit passes to new residents; • The project establishes strong connections in site design to promote convenient access and transit orientation; and, • The project would monitor transit use by new residents for the first six months of project operations. Non-Residential Projects: If the project is located within the Downtown Specific Plan, South Centre City Specific Plan, or East Valley Parkway Specific Plan, will the project implement Transportation Demand Management (TDM) program that includes, at a minimum: • "End-of-trip" facilities for bicycle commuters (e.g. bicycle parking spaces, showers, lockers); • Discounted monthly North County Transit District (NCTD) passes or transit subsidies; • Informational material (provided to each employee or tenant) for carpool and vanpool ride-matching services; and • Parking cash-out policies. Check "N/A" only if the project is a single-family residential project; if the project is multi-family or non-residential but not located within the aforementioned specific plans; or if the project does not propose any construction activities..	☐	☐	☐
Please substantiate how the project satisfies question 3:			

4. Bicycle Infrastructure (Measure T-3.5) All Projects: If the following conditions are met, would the project pay its fair-share contribution to bicycle infrastructure improvements? ☐ Intersection or roadway improvements are proposed as part of the project; and ☐ The City's Bicycle Master Plan for identifies bicycle infrastructure improvements at any intersection(s) or roadway segment(s) that would be impacted as part of the project. Check "N/A" if the intersection or roadway improvements required are fully in place to the satisfaction of the Director of Community Development; or if the project does not propose any construction activities.	☐	☐	☐

Please substantiate how the project satisfies question 4:

Building Energy Use and Efficiency

5. Alternatively Fueled Water Heaters (Measures E-4.1 and E-4.2) Residential Projects: If the project is a new single-family or multi-family residential development, will the project install electric heat pump water heaters? Non-Residential Projects: If the project is non-residential, will the project install electric heat pump water heaters? Check "N/A" only if the project is non-residential and has an alteration and addition with a permit value of $200,000 or less; or if the project does not propose any construction activities.	☐	☐	☐

Please substantiate how the project satisfies question 5:

6. Electric Cooking Appliances (Measure E-4.2) Single-Family Residential Projects: N/A Multi-Family Residential Projects: If the project is a new multi-family residential development, will the project install only electric cooking appliances? Non-Residential Projects: N/A Check "N/A" only if the project is a single-family residential or non-residential project, or if the project does not propose any construction activities.	☐	☐	☐

Please substantiate how the project satisfies question 6:

7. Zero Net Energy (Measure E-5.2) Residential Projects: N/A Commercial Projects: If the project is a new commercial retail or office development, would the project achieve zero net energy (i.e. the total amount of energy used on-site is equal to the amount of renewable energy created on-site) and comply with the most recently updated California Building Energy Efficiency Standards (Title 24, Part 6)? Check "N/A" only if the project is a residential or project, or if the project does not propose any construction activities.	☐	☐	☐

Please substantiate how the project satisfies question 7:

Landscaping and Land Conservation			
8. Landscape Water Consumption (Measure W-6.2) Single-Family Residential Projects: If the project is proposing a single-family or townhome model home development, would the project: • Fully equip all model homes with greywater systems and rain barrels (or other rainwater capture systems); and, • Offer greywater systems and rain barrels (or other rainwater capture systems) as an add-on option for new homes. Non-Residential Projects: N/A Check "N/A" if the project is not a single-family or townhome model home development; or if the project does not propose any construction activities.	☐	☐	☐
Please substantiate how the project satisfies question 8:			
9. Tree Planting (Measure C-9.1) All Projects: Would the project plant trees consistent with the following requirements? • Would the project plant a minimum of one tree for every four new parking spaces and/or demonstrate 50% canopy coverage in parking areas? Residential Projects: In addition to the planting requirements above for all projects, would the project be consistent with the following requirement? • Would the project plant a minimum of one tree per dwelling unit or pay an in-lieu fee? Check "N/A" only if the project is not proposing any landscaping; or if the City's landscape ordinance would not apply to the project.	☐	☐	☐
Please substantiate how the project satisfies question 9:			