

**CALIFORNIA ENERGY COMMISSION
APPLICATION FOR CERTIFICATION
PURSUANT TO THE 21 DAY EMERGENCY
PERMITTING PROCESS**

1. Project Description

The Applicant, Wildflower Energy LP, proposes to construct a simple cycle dual fueled peaking electric generation facility consisting of two GE LM6000 Enhanced Sprint gas turbine engines.

The Project is called the Larkspur Energy Facility and will be located at the corner of Harvest Road and Otay Mesa Road in the Otay Mesa area of the City of San Diego (Figures 1 and 2).

1.1 Project Owner/Operator (Name, Address, Phone)

Wildflower Energy LP
Two Houston Center,
909 Fannin, Suite 2222,
Houston Texas 77010
(713) 374 – 3900
(713) 374 – 3901 (fax)

Project Contact:

John Jones
Vice President,
InterGen North America
(713) 374 – 3919

1.2 Overview of Power Plant and Linear Facilities

The Larkspur Energy Facility (“Larkspur”) is a nominally rated 90 Megawatt (MW) power plant that will utilize two dual fueled GE LM6000 Enhanced Sprint gas turbine engine-generators equipped with state of the art air pollution control features. GE LM6000 aeroderivative combustion turbine-generators have been installed in hundreds of facilities throughout the world. The facility will be configured in a simple-cycle mode. The combustion inlet air will be filtered and cooled via a chiller system to increase

efficiency and output. Two cooling towers will provide cooling water for both the chilling systems and the lube oil systems. The generators will be air cooled. The project will include a staging and maintenance area located immediately adjacent to the Larkspur plant site.

To reduce nitrogen oxide (NO_x) emissions from Larkspur, selective catalytic reduction (SCR) technology will be used. SCR, considered a best available control technology, is a reliable and proven technology to reduce NO_x emissions. Injecting ammonia vapor (NH₃) into the flue gases, which then pass through a catalyst material, reduces the NO_x emissions. The resulting chemical reaction reduces the NO_x to harmless nitrogen and water. Aqueous ammonia will be transported approximately five times per month to the site via a tanker truck, regulated by the California Department of Transportation (Caltrans). Aqueous ammonia will be stored in one 10,000-gallon storage tank onsite. Secondary steel containment will be designed to retain a minimum of 110 percent of the storage tank volume. A small ammonia flow control vaporization skid will be utilized to heat the ammonia and inject it into the SCR system.

The size of the facility is compact and consists of modular components (Figure 3). With the exception of the two, 60-foot stacks and turbine compressor vents, the facility components are less than 45-feet in height and will occupy approximately three acres.

The physical electrical interconnection for Larkspur will be to the existing, adjacent San Diego Gas & Electric (SDG&E) 69 Kilovolt (kV) Border Substation. A new 69 kV overhead line will tie the two generator step-up transformers to the Border Substation. The line will be approximately 500 feet. SDG&E will supply temporary construction and standby power.

Larkspur will use natural gas supplied via a new 500-foot long, approximately 8-inch diameter interconnection line from a new SDG&E gas metering station located on the project site to an existing 36-inch SDG&E line. The SDG&E 36-inch gas transmission line runs along an easement just east of the SDG&E Border substation and immediately south of the site. The project will utilize an estimated 1,000 million British thermal units (MMbtu/hr) of pipeline quality natural gas.

Clean-burning natural gas will be the primary fuel source. However, liquid fuel will serve as a secondary fuel source to be used only in the event of a utility mandated gas curtailment event. Liquid fuel will be trucked on site and stored in one 110,000-gallon tank.

Larkspur will obtain potable water via an interconnect to the existing Otay Water District line underneath Otay Mesa Road. The facility will consume approximately 320-gallons per minute (gpm) water at peak use. Potable water will be treated with a reverse osmosis membrane and off site, regenerated portable trailer mounted demineralizers. Water for landscape irrigation will be provided via an existing 16-inch reclaim water line.

Water discharge will be to the City of San Diego Metropolitan Wastewater District system via an existing sewer line in Otay Mesa Road. The facility will discharge reverse osmosis byproducts, cooling tower blowdown and water from the oily water separator (OWS) process. The OWS process will remove oil from specific plant drains around the combustion turbine generator. Approximately 60-gpm of wastewater as a byproduct of reverse osmosis treatment of the water and cooling tower blowdown will be discharged to the sewer system. Wastewater discharge will meet City of San Diego water quality requirements. Plant drains will be routed to a separation sump, with provisions for oil collection by an OWS. Any oil sludge will be properly disposed at appropriate waste disposal or recycling facility.

1.3 Structure Dimensions (Size and Height), Plan and Profile

The size of the facility is compact and consists of modular components. The facility components are less than 45-feet in height and will occupy approximately three acres, with the exception of two, 60-foot stacks and a turbine compressor vent. See Figure 3, Site Plan and Figure 4, Elevations.

1.4 Full Size Color Photo of the Site and Rendering of Proposed Facility, If Available

Wildflower is currently preparing photo simulations of the site. Full size color photos are provided in Attachment 16.

1.5 Maximum Foundation Depth, Cut and Fill Quantities

The proposed equipment will be supported on reinforced concrete foundation mats at grade. The mat foundations will be approximately three feet thick for the major equipment (CTG, SCR, etc.), and approximately two feet thick for the ancillary equipment. Foundations will be designed to support the weight of the equipment, plus operating loads, in addition to the imposed loads due to wind or seismic.

The proposed project site will be graded to near flat within the equipment power island area. The site elevation will be determined based on the existing topography, and a balanced cut and fill program.

1.6 Conformance with California Building Code

The Larkspur facility will be designed and constructed in accordance with all applicable local, state and federal design standards commonly used in the design of peaking generation facilities. These standards will include specific criteria as it applies to the State of California and the City of San Diego and will encompass seismic design standards as they pertain to the Larkspur site.

1.7 Proposed Operation (Hours Per Year)

The Larkspur facility is designed as a peaking unit, however, it will be permitted for 5,950 hours of operation to allow for maximum flexibility. The facility will be permitted with an umbrella emissions cap with the flexibility to operate either turbine within the cap.

1.8 Expected On-line Date

Larkspur is expected to be on-line and be ready for commercial operation on July 5, 2001. It is anticipated that construction will require approximately four months, provided that there are no delays in the gas and electric interconnection process. In the event of a delay in gas and electric interconnection of the facilities, it is considered that the construction period could be delayed up to seven months.

1.9 Proposed Duration of Operation (Years)

It is anticipated that the facilities project life is 50 years.

1.10 Identify Transmission Interconnection Facilities

The physical electrical interconnection for the facility will be to the existing, adjacent San Diego Gas & Electric (SDG&E) 69kV Border Substation. A new 69 kV radial overhead line will tie the facility generator step-up transformers to the Border Substation. The line will be approximately 500 feet. SDG&E will supply temporary construction and standby power.

1.11 Transmission Interconnection Application

The Transmission Interconnection Application is provided in Attachment 1.

1.12 “Down-stream” Transmission Facilities, If Known.

The Border Substation is connected via two separate 69 kV lines to the Miguel Substation and to the San Ysidro Substation. See Attachment 2, Border Substation System Impact Study, for further information on downstream transmission facilities.

1.13 Fuel Interconnection Facilities

Larkspur will use natural gas supplied via a new 500-foot long, approximately 8-inch diameter interconnection line from a new SDG&E gas metering station located on the project site to an existing 36-inch SDG&E gas transmission line immediately east of the SDG&E Harvest Road gas regulation station and south of the site. The project will utilize an estimated 1,000 MMbtu/hr of pipeline quality natural gas.

1.14 Fuel Interconnection Application

See Attachment 3 for the Fuel Interconnection Application.

1.15 Water Requirements and Treatment

The facility will consume approximately 320-gpm water at peak use. Raw water will be treated with a reverse osmosis membrane and off site, regenerated portable trailer mounted demineralizers. Water for landscape irrigation will be provided via an existing 16-inch reclaim water line.

1.16 Water Interconnection Facilities (Supply/Discharge)

Larkspur will obtain water via an interconnect to the existing Otay Water District line underneath Otay Mesa Road. Raw water will be treated with a reverse osmosis membrane and off site, regenerated, portable trailer-mounted demineralizers. Water for landscape irrigation will be provided via an existing 16-inch reclaim water line.

Site storm water drainage will be to the City of San Diego Metropolitan Wastewater District system via an existing sewer line in Otay Mesa Road. The facility will discharge storm water and water from the OWS process. The OWS process will remove oil from specific plant drains around the combustion turbine generator. Wastewater as a by-

product of reverse osmosis treatment of the water will be discharged to the sewer system. Plant drains will be routed to a separation sump, with provisions for oil collection by an OWS. Any oil sludge will be properly disposed at an appropriate waste disposal or recycling facility.

1.17 Source and Quality of Water Supply

Larkspur will obtain water from the Otay Water District municipal system. Refer to Attachment 4 for water quality information.

1.18 Water Supply Agreement/Proof of Water Supply

Wildflower has reviewed the project requirements with the Otay Water District confirming the Water District's ability to serve the Larkspur facility. Wildflower expects to execute a Water Supply Agreement in time for interconnection of water supply services to support construction and operation. Wildflower has received an ability to serve letter, refer to Attachment 5.

2. Site Description

2.1 Site Address (street, city, county)

The site is located at the intersection of Harvest Road and Otay Mesa Road, City of San Diego, San Diego County, 92173.

2.2 Assessor's Parcel Number

The ground lease shall apply to a mutually agreeable location of approximately three acres within the boundaries of the parcel bearing San Diego County Assessor Parcel Number 646-130-48, in the City of San Diego, California.

2.3 Names and Addresses of All Property Owners Within 500 Feet of the Project Site or Related Facilities in Both Hard Copy and Electronic Mail Merge Format

Refer to Attachment 9 for a map of adjacent parcels and Attachment 12 for a list of adjacent property owners. A list of all property owners within a 500-foot radius of the plant site and off-site linears is provided in Attachment 19. The list of property owners within a 500-foot radius of the plant and off-site linears is being provided in electronic mail merge format under separate cover.

2.4 Existing Site Use

The site was historically used for agricultural purposes. The site is dominated by non-native grasses and is undeveloped.

2.5 Existing Site Characteristics (paved, graded, etc.)

The site topography is a flat field with an approximate elevation of 540 feet average mean sea level (ASML), and is dominated by non-native grasses.

2.6 Layout of Site (include plot plan)

The plant will be constructed within a 300' x 500' site that includes the main power generation turbines, the SCR modules, exhaust stacks, the control enclosures and a facility substation that includes the step up transformers and plant circuit breakers. The utility interconnect will extend from the dead end structure to overhead poles which connect the 69 kV line to the north bay of the Border substation. See Figure 3, Site Plan.

2.7 Zoning and General Plan Designations of Site and Linear Facilities

The site is planned for use as an Industrial Park and zoned as part of the Industrial Subdistrict of the Otay Mesa Development District (San Diego Municipal Code Section 103.1103). The surrounding land use and zoning is also industrial. Power generation is a permitted use within this zone.

2.8 Ownership of Site (name, address, phone)

CIF Holding, LP, a California limited partnership
c/o Robert Houck
6363 El Cajon Blvd., Suite 206
San Diego, CA 92115
(619) 583-0093.

2.9 Status of Site Control

The project has signed a binding Letter of Intent to Lease the three-acre parcel from CIF Holding, LP for 10 years, with options to extend the term of the lease. The final Lease Agreement will be executed prior to the commencement of construction.

2.10 Equipment Laydown Area - size and location

The project will utilize an approximately 0.5 to 1-acre staging area on the east side turbine generator sets that is reserved for a future switchyard. Additionally, the project will utilize approximately 2,000 feet of off-site administrative and warehousing facilities located near the site. This area has not yet been determined.

3. Construction Description

3.1 Construction Schedule

It is anticipated that construction will require approximately two to three months, provided that there are no delays in the gas and electric interconnection process. In the event of a delay in gas and electric interconnection of the facilities, it is considered that the construction period could be delayed up to seven months. Larkspur is expected to be on-line and ready for commercial operation on July 5, 2001.

3.2 Workforce Requirements (peak, average)

At the beginning of the project, the construction team will consist of approximately 80 workers. The team will grow to be 200 over the first four weeks of the construction schedule. During the following two months, the construction team will remain approximately 200. During the last four weeks of construction, the team will be reduced to 40. It is anticipated that most of the construction workers will not be expected to relocate. During plant operations, the plant site will be dispatched from a remote location. A crew of up to five employees will be dispatched to the site periodically during times of “peak” energy needs and for maintenance activities. Construction activities will not contribute to a significant increase in the population of the project area.

4. Power Purchase Contract (DWR, ISO, other)

4.1 Status of Negotiations and Expected Signing Date

The facility is required to supply capacity and energy to the California ISO (CAISO) pursuant to a Summer Reliability Agreement (SRA) executed with the ISO on November 28, 2000. The SRA requires the plant to be on line for Summer 2001 and allows the

CAISO to dispatch the facility from June to October for up to 500 hours for years 2001, 2002, and 2003.

5. Air Emissions

5.1 Nearest monitoring station (location, distance)

The nearest monitoring station is located within one mile of the site at 1100 Paseo International, Otay Mesa, 32.5839N latitude and 116.9375W longitude.

5.2 Provide Complete Self Certification Air Permit Checklist

Refer to Attachment 6 for the complete self certification air permit checklist.

5.3 Provide Complete Air Permit Application

Refer to Attachment 7 for the complete air permit application.

5.4 Status of Air Permit Application with Air District

The air permit application was submitted to the San Diego Air Pollution Control District (APCD) on February 23, 2001. The air permit application was amended on March 5, 2001, reflecting a change in facility design and configuration.

5.5 Status of Offsets and/or Mitigation Fees, As Required

No offsets or mitigation fees are needed. The facility does not trigger the San Diego APCD's emission offset threshold.

6. Noise

6.1 Local Noise Requirements

The City of San Diego, through its noise ordinance (Section 59.5.0401) has established property line sound levels limits for various land use zones. The land use zone and the time of day determine the applicable sound level limit. Noise subject to the limits is the total noise at the specified location that is due solely to the action of the noise generator. Please see the table below regarding local noise requirements.

CITY OF SAN DIEGO SOUND LEVEL LIMITS

Zone	Time	Applicable Limit One-Hour Average Sound Level (Decibels)
R-1	7:00 a.m. – 7:00 p.m.	50
	7:00 p.m. – 10:00 p.m.	45
	10:00 p.m. – 7:00 a.m.	40
R-2	7:00 a.m. – 7:00 p.m.	55
	7:00 p.m. – 10:00 p.m.	50
	10:00 p.m. – 7:00 a.m.	45
R-3, R-4 and all other residential	7:00 a.m. – 7:00 p.m.	60
	7:00 p.m. – 10:00 p.m.	55
	10:00 p.m. – 7:00 a.m.	50
Commercial	7:00 a.m. – 7:00 p.m.	65
	7:00 p.m. – 10:00 p.m.	60
	10:00 p.m. – 7:00 a.m.	60
Manufacturing and all industrial activities	Anytime	75

Source: City of San Diego Noise Ordinance, Section 59.5.0401

6.2 Nearest Sensitive Receptor (type, distance)

The closest noise sensitive receptors to the Larkspur site are three single-family residences located on Otay Mesa Road, approximately one mile to the east.

6.3 Project Noise Level at Nearest Property Line

Acoustical calculations were performed to estimate the sound level from the project at the property line and at the closest residence. The calculations assumed that all noise-generating equipment attenuate have “point” source acoustical characteristics. A point source attenuates at a rate of approximately six decibels (dBA) per doubling of distance from the source-receiver pair. This is a logarithmic relationship describing the acoustical spreading of a pure undisturbed spherical wave in air. The effects of directionality, atmospheric absorption, ground attenuation, and intervening topography and off site structures which may further reduce propagated noise levels, were not considered due to uncertainties. The sound level at the property line will range from 65 dBA to 76 dBA. The sound level at the closest residence will be approximately 39 dBA.

6.4 Proposed Mitigation, If Required

Acoustical calculations show that the sound level at the property line will range from 65 dBA to 76 dBA. The 76 dBA will occur at the north property line adjacent to Otay Mesa

Road. However, a 10-foot high noise barrier built along the property line will provide an insertion loss of at least 10 decibels. Acoustical calculations show that the sound level from the Larkspur plant at the three single-family residences will be approximately 39 dBA. Sound levels will be substantially below the measured ambient noise levels and not result in a significant impact.

7. Hazardous Materials

7.1 Type and Volume of Hazardous Materials On-site

Lubrication oil in a 500 gallon container, turbine oil in a 150 gallon container, and hydraulic oil in a 40 gallon container will be used and stored onsite. Also, aqueous ammonia and diesel fuel oil will be stored onsite for the project. The storage volume and purpose of each of the two chemicals are described below.

Aqueous ammonia or ammonium hydroxide (NH_4OH) will be stored on site in one 10,000-gallon vertical tank built inside a secondary containment sized for 110% of the stored chemical. Ammonia will be used on site for emission control using a Selective Catalytic Reduction (SCR) unit. The SCR is an air pollution control system typically used for such applications.

SCR is a post-combustion flue gas control technology that removes NO_x from the flue gas after it has been generated in the combustion process. The SCR uses ammonia to react with NO_x in the exhaust gases and convert them into environmentally acceptable emissions. It is proposed that aqueous ammonia at a concentration of approximately 19.5 percent be used for the project. The on-site storage and handling of aqueous ammonia will be regulated under the California Accidental Release Program (CalARP) requirements (California Health and Safety Code (CH&SC) Section 2770.1).

The proposed project will also use diesel as an alternate fuel source for the turbines. To provide a steady supply of diesel to the turbines, on demand, one 110,000-gallon tank is proposed to be located within the boundaries of the proposed site. The tank will be within an enclosed dike, which will serve as secondary containment for the stored fuel. The capacity of the secondary containment will provide storage for the entire content of the tank plus a 10 percent provision for rainwater accumulation. Per federal regulations the proposed fuel tank will require a Spill Prevention Control and Countermeasure (SPCC) plan (40 CFR 112) to handle any potential leaks and spills from the storage and handling of diesel fuel at the site.

7.2 Storage and Facilities and Containment

Refer to 7.1 above.

8 Biological resources

8.1 Legally protected species* and their habitat on site and along linear facilities

The project site is located in a field of disturbed non-native grasses. A biological assessment report was prepared (February 2001) for this site by URS Corporation (Attachment 8). The assessment concluded that the site does not currently contain, nor is it expected to support, any sensitive biological resources. The diversity of species will not be affected by the proposed project, nor will the project effect the movement of fish or any wildlife species. There are no wetlands, vernal pools or other critical habitat onsite or adjacent.

8.2 Legally Protected Species and Their Habitat Adjacent to Site and Along Linear Facilities

Refer to 8.1 above.

8.3 Designated Critical Habitat On-site or Adjacent (wetlands, vernal pools, riparian habitat, preserves)

Refer to 8.1 above.

8.4 Proposed Mitigation, If Required

Mitigation of biological resources is not required for this site.

9 Land Use

9.1 Local Land Use Restrictions (height, use, etc.)

According to the Otay Mesa Community Plan (April 1981) and Progress Guide and General Plan (1989), the site is located within an Industrial Park land use. Therefore, the proposed project is consistent with the planned use (an industrial use). The proposed project is south of the Brown Field Airport Influence Area as defined on Exhibit 3-1 in the Draft Comprehensive Land Use Plan for Brown Field Airport (May 1999). The project is not mapped within the current or proposed approach zone. All structures

associated with the project will be 80 feet or less. The proposed project is a compatible land use as defined in the Brown Field Land Use Plan. There are no height limits associated with this zoning district.

9.2 Use of Adjacent Parcels (include map)

The site is situated between Otay Mesa Road on the north, Harvest Road on the west, SDG&E's Border substation and gas regulator station on the south, and approximately six acres of undeveloped land between the site and Sanyo Road to the east. The land beyond Otay Mesa Road, Harvest Road, and the Border substation and regulator station is undeveloped open space. Refer to Attachment 9.

9.3 Ownership of Adjacent Parcels - site and linears

The project is abutted by Otay Mesa Road to the North, Harvest Road to the West, the San Diego Gas and Electric (SDG&E) 69 kV Border Substation to the South and property owned by CIF Holding, L.P. (the Larkspur site land owner) to the East. A list of adjacent owners is provided in Attachment 12.

9.4 Demographics of Census Tract (if known)

The demographics of the census tract were unknown at the time of the preparation of the application; however, the following demographic information was obtained by using the zip code (92173) of the project site. This area has a total population of 30,253 in 1990. Forty percent of the population is younger than the age of 21; 46 percent of the people are between the ages 22 and 49; 10 percent of the people are between the ages 50 and 69; and three percent of the people are over the age of 70. The median family income in 1989 was \$19,840 and approximately 25 percent of the total population were below the poverty level. The racial percentages of the total population are shown in the table below.

Race	Percentage of Population
White	41
Black	8
Indian	0.5
Asian	4
Hispanic*	77
Other	46
Source: 1990 United States Census Bureau * It should be noted that the Bureau of Census indicates that persons of Hispanic origin may identify with any of the minority population categories listed above, as well as with White and any other category, to capture undefined origins.	

10 Public Services

10.1 Ability to Serve Letter from Fire District

The City of San Diego Fire Department, Fire Captain Bob Medan, verbally confirmed the City's ability to serve the Larkspur facility. Station 43, located 0.5 miles from the Larkspur site. Station 43 is supported by Battalion Chief 12, and Stations 6 and 29, all located within 16 miles of the project site. A fax requesting a letter stating the fire districts ability to serve was sent to the fire department on March 2, 2001 and Wildflower has received a written reply in Attachment 15.

10.2 Nearest Fire Station

The City of San Diego Otay Mesa Fire Station No. 43 will serve the site. Fire Station No. 43 is located at 1590 La Media Road, at the intersection of Otay Mesa Road and La Media Road, approximately 0.5 miles from the Larkspur site.

11 Traffic and Transportation

11.1 Level of Service (LOS) Measurements on Surrounding Roads - a.m. and p.m. peaks

Site access is provided by State Route 905 (SR-905) east to Otay Mesa Road to Harvest Road. Otay Mesa Road varies from four to five lanes within the City of San Diego, becoming a 24 two 40 foot wide interim road in the Otay Mesa community east of its junction with SR-905. Otay Mesa Road in the City of San Diego Circulation Element is

a six-lane primary arterial between the terminus of SR-905 and SR-125/Harvest Road. Otay Mesa Road in the City of San Diego Circulation Element is a six lane primary arterial between the terminus of SR-905 and SR-125/Harvest Road.

Roadway	Location*	Capacity*	LOS*	Annual Average	Peak Hour
				Daily Traffic	Traffic
Otay Mesa Road	Pacific Rim Court. - Heritage Rd.	29,600	E	40,700	1,400
	SR-905 (w. of Harvest Rd) - Pacific Rim Court.	29,600	C	34,500	2,430
	Sanyo Ave.- SR-905 (w. of Harvest Rd.)	7,100	B	3,600	230
	Alta Rd.- Sanyo Avenue.	7,100	B	4,100	404

Source: URS, 1999

*Otay Mesa Road has recently been widened. The Capacity and LOS data presented in the above table represents conditions prior to the widening of Otay Mesa Road.

11.2 Traffic Control Plan - for Roads During Construction Period

Wildflower will develop and implement a standard traffic control plan consistent with the size and scope of the Larkspur facilities construction activity designed to minimize impact to traffic flow. Some of these safety measures include:

- Utilize proper signs and traffic control measures in accordance with Caltrans and City requirements.
- Install crossing structures to avoid obstructing roads.
- Coordinate construction activities with appropriate County departments if closures of major roads are necessary during pipeline construction.
- Coordinate crossing of State highways with Caltrans in accordance with Caltrans regulations and permit requirements.
- Schedule traffic lane or road closures during off-peak hours whenever possible.

- Limit vehicular traffic to approved access roads, construction yards, and construction sites.
- Construct offsite pipelines in accordance with applicable State and local encroachment permit requirements. Cover trenches in roadways during non-work hours.

Wildflower will obtain the following permits prior to project construction:

- Transportation permits required by Caltrans to transport oversize, overweight, overheight, and overlength vehicles on State highways (in compliance with California Vehicle Code Section 35780; the Streets and Highways Code Sections 117 and 660-711; and 21 California Code of Regulations 1411.1 to 1411.6);
- Encroachment permits required from Caltrans for pipeline crossings of State highways; and
- Encroachment permits required by the County of San Diego for pipeline crossings of County-maintained roadways.

Compliance with California Vehicle Code Section 31300 et seq. regarding the transportation of hazardous materials.

11.3 Traffic Impact of Linear Facility Construction

The construction of linear facilities will have a minimal, temporary incremental impact on traffic flow as the gas and electric interconnects are adjacent to the project site. Gas and sewer interconnects along Harvest Road may temporarily impact traffic flow on Harvest Road, but this impact will be minimized through the implementation of standard traffic control plans.

11.4 Equipment Transport Route

Site access is provided by State Route 905 (SR-905) east to Otay Mesa Road. Otay Mesa Road varies from four to five lanes within the City of San Diego, becoming a 24 to 40 foot wide interim road in the Otay Mesa community east of its junction with SR-905. Otay Mesa Road in the City of San Diego Circulation Element is a six-lane primary arterial between the terminus of SR-905 and SR-125/Harvest Road.

11.5 Parking Requirements - workforce and equipment

The project will require parking for construction workers during the construction period. Adequate parking would be provided within the construction staging area located near the on the easement parallel to Harvest Rd. Unloading will take place onsite east of gas turbine generator sets. The facility will be remotely operated; approximately five employees would be dispatched to the site during times of peak energy need. Parking spaces will be provided on site. No impacts are anticipated to off-site parking.

12 Water Resources

12.1 Wastewater Volume, Quality, Treatment

Wastewater will be discharged to the City of San Diego Metropolitan Wastewater District (Metropolitan) industrial sewer system via an existing sewer line located along Otay Mesa Road. There will be three sources of wastewater. The first is from the oil water separator (OWS) process. The OWS process will remove oil from specific plant drains around the combustion turbine generator. Plant drains will be routed to a separation sump, with provisions for oil collection by an OWS. Any oil sludge will be properly disposed at an appropriate waste disposal or recycling facility. The second source of wastewater is from the operation of a reverse osmosis water treatment system used to produce high purity water for injection into the turbine as part of the air emissions control system. The quality of the reverse osmosis wastewater is good, with the cycles of concentration ranging between 3 and 4 times that of the fresh water. There will be no chemical treatment of the reverse osmosis wastewater. The third source consists of cooling tower blowdown. The size of the cooling water is relatively small, with a blowdown rate of approximately 7 gpm. Metropolitan has requirements for temperature, total dissolved solids and total organics; Wildflower will meet all requirements for discharge into the Metropolitan sewer lines. While the exact point of interconnection has not been determined, Metropolitan has indicated that sewer system has sufficient excess capacity to serve the facility, and that the quality of the wastewater is acceptable to Metropolitan.

12.2 Status of Permits for Wastewater Discharge or Draft Permit (WDR/NPDES)

Wildflower has meet with the director of the Metropolitan Wastewater District and they have given us preliminary consent to accept the wastewater from our facility. We are currently preparing a detailed wastewater discharge permit application for submittal, which will be obtained prior to startup.

12.3 Draft Erosion Prevention and Sedimentation Control Plan or Mitigation Strategy

Draft Erosion Prevention and Sedimentation Control Plans are being prepared as part of the civil design, as applicable. These plans are included in Attachment 13.

12.4 Spill Prevention/Water Quality Protection Plans

The types and quantity of oil/oil products stored onsite and presented in Section 7.1. For this site the total quantity of oil stored exceeds the threshold quantity for Spill Prevention Control and Countermeasures Plan (SPCC) per 40 CFR 112. Therefore a SPCC plan for the operating facility will be in place prior to the introduction of diesel fuel in the facility. A draft plan is included as Attachment 18 for review.

The storage and handling of aqueous ammonia at the site will be covered under the California Accidental Release Program (CalARP) and the completed CalARP will be approved by the local agency, the city of San Diego Hazardous Materials Division prior to the introduction of the chemical on site.

The total area of the site is less than 5 acres therefore a Storm water Pollution Prevention Plan (SWPPP) for construction will not be required from the local Regional Water Quality Control Board (RWQCB). However, throughout the construction phase of the project strict adherence to Best Management Practices (BMPs) for storm water pollution prevention from on-site activities will be followed. These BMPs will include culverts, berms, sandbags and other acceptable procedures.

The operating facility will require a SWPPP, and a Storm water Monitoring Plan. A Notice of Intent (NOI) will be submitted to the RWQCB before the start of industrial activities per their requirements. This will be followed by the preparation of a SWPPP for the site. All chemicals/oils stored onsite will be in closed containers and will include secondary containment to prevent flow of chemicals and oils into the storm sewers. The SWPPP will contain the following elements:

- 1.0 General description of facility operations;
- 2.0 Significant materials used at the facility;
- 3.0 No history of chemical releases from the site;
- 4.0 Location, storage, and handling of significant materials oil and chemicals;

- 5.0 Current storm water flow patterns and pollution prevention measures;
- 6.0 Storm water drainage system;
- 7.0 Spill prevention and response;
- 8.0 Sediment control and erosion prevention;
- 9.0 Employee training program and facility record keeping;
- 10.0 Elimination of non-storm water discharge; and
- 11.0 Storm water management controls.

The following forms to record stormwater activity will also be prepared

- 1. Facility storm water inspection checklist
- 2. Storm water sampling list
- 3. Annual report preparation format.

13 Cultural Resources

13.1 Identification of Known Historic/Prehistoric Sites

A map of known historic/prehistoric sites is provided as part of a cultural resource letter report prepared by Gallegos & Associates for the Larkspur site on February 21, 2001 (Attachment 10). This report concludes that the proposed Larkspur site contains one prehistoric site (CA-SDI-12337/5352) and one historic site (McCool Homestead). Testing to determine site significance under CEQA and eligibility to the National Register of Historic Places has been completed for site CA-SDI-12337/5352. This site was identified as not significant and not eligible for placement on the National Register of Historic Places. The East Otay Mesa Specific Plan Cultural Resources Technical Report identifies this site as “Tested, Nor Further Constraint.” Therefore, the prehistoric site will not be significantly impacted by the proposed project.

The McCool Homestead site consists of: palm, eucalyptus, olive and pepper trees; a cement foundation; a cistern; and, purple glass fragments on the site surface. No structures are on the subject property. Given early map and reference in local press; cistern, and potential for privies and dumps on the Larkspur site, the McCool Homestead is identified as significant cultural resource under CEQA, but not significant under the City Resource Protection Ordinance.

13.2 Proposed mitigation if required

The following data recovery program will reduce the potential adverse impacts to below a level of significance. Mitigation of potential impacts can be achieved through:

- C-1 The completion of additional research to place the McCool Homestead in a historical framework;
- C-2 Subsurface excavation to locate privies and dumps. If privies and/or dumps are located, then these will be excavated; artifacts cleaned and analyzed; and, a report of finding will be completed and submitted to the City of San Diego.
- C-3 Full documentation and excavation of the cistern.

Steve Van Wormer, M.A., a registered professional archeologist will direct the data recovery program described above.

13.3 Notification of Native Americans

There are no significant Native American artifacts impacted at this site. Native American notification letters are provided in Attachment 17.

14 Paleontological Resources

14.1 Identification of Known Paleontological Sites

A Paleontological Resource Assessment was performed for the site by Tom Demere (February 2001) and is provided as Attachment 11.

14.2 Proposed Mitigation, If Required.

No mitigation is necessary for paleontological resources at the project site.

15 Visual Resources

15.1 Plan for Landscaping and Screening to Meet Local Requirements

A landscaping plan is being developed by Wildflower to meet the requirements of the City of San Diego's Otay Mesa Development District guidelines. The plan is included in Attachment 14.

15.2 Full Size Color Photo of the Site and Rendering of Proposed Facility with Any Proposed Visual Mitigation, If Available

Wildflower is currently preparing photo simulations of the site. Full color photos of the site are provided in Attachment 16.

16 Transmission System Engineering

16.1 Conformance with Title 8, High Voltage Electrical Safety Orders, CPUC General Order 95 (or NESC), CPUC Rule 21, PTO Interconnection Requirements, and National electric code

The project will conform with Title 8, High Voltage Electrical Safety Orders, CPUC General Order 95 (or NESC), CPUC Rule 21, PTO Interconnection Requirements, and National Electric Codes.

References

United States Census Bureau. 1990 US Census Data. Web Site.
<http://venus.census.gov/cdrom/>.

Caltrans. 1999. 1999 Traffic Volumes on the California State Highway System (CSHS).
<http://www.dot.ca.gov/hq/traffops/saferesr/trafdata/>.

URS. 2000. Application for Certification for the Otay Mesa Generating Station.

Attachments:

- Attachment 1: Transmission Interconnection Application
- Attachment 2: Border Substation System Impact Study
- Attachment 3: Fuel Interconnection Application
- Attachment 4: Water Quality Information
- Attachment 5: Water Supply Agreement
- Attachment 6: Self Certification Air Permit Checklist
- Attachment 7: Air Permit Application
- Attachment 8: Biological Assessment Report
- Attachment 9: Adjacent Landowner Map
- Attachment 10: Cultural Resources Letter Report
- Attachment 11: Paleontological Resource Assessment
- Attachment 12: Property Owners within 500 feet of Plant site and off site Facilities
- Attachment 13: Grading and Erosion Plan
- Attachment 14: Landscape Plan
- Attachment 15: Letter from Fire Department
- Attachment 16: Photographs of Site
- Attachment 17: Native American Notification Letters
- Attachment 18 Draft Spill Prevention, Control and Countermeasure (SPCC) Plan
- Attachment 19 Property Owners within 500 Feet of the Project and Related Facilities