

**From:** [Gungle, Ashley](#)  
**To:** [Boparai, Poonam](#)  
**Subject:** FW: Soitec Solar - Tierra del Sol - GHG Reports - AB 900  
**Date:** Monday, February 11, 2013 11:19:06 AM  
**Attachments:** [Tierra Del Sol Climate Change Technical Report 2.11.13\\_TC.docx](#)  
[Tierra Del Sol Climate Change Technical Report 2.11.13\\_CLEAN.pdf](#)  
[Tierra Del Sol Climate Change Technical Report 2.11.13.docx](#)

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Hi Poonam,

Do you have tasks to review these revised Climate Change reports (Tierra Del Sol and Rugged)?

If not, please let me know and I will put in a request.

Thanks,

Ashley

---

**From:** Slovic, Mark  
**Sent:** Monday, February 11, 2013 11:09 AM  
**To:** Gungle, Ashley  
**Subject:** FW: Soitec Solar - Tierra del Sol - GHG Reports - AB 900

fyi

---

**From:** David Hochart [<mailto:dhochart@dudek.com>]  
**Sent:** Monday, February 11, 2013 10:53 AM  
**To:** Boparai, Poonam; Slovic, Mark  
**Cc:** Patrick BROWN; David Deckman  
**Subject:** RE: Soitec Solar - Tierra del Sol - GHG Reports - AB 900

Hi,

Provided attached is a revised Climate Change Technical Report for the Tierra del Sol Solar Project. We discovered an incorrect value in the calculations, which had resulted in an overestimate of the GHG emissions.

Let us know if you have any questions during your review.

Thanks

David

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**From:** David Hochart  
**Sent:** Friday, February 08, 2013 12:51 PM  
**To:** [Poonam.Boparai@sdcounty.ca.gov](mailto:Poonam.Boparai@sdcounty.ca.gov); Slovic, Mark  
**Cc:** 'Patrick BROWN'; David Deckman ([ddeckman@dudek.com](mailto:ddeckman@dudek.com))  
**Subject:** Soitec Solar - Tierra del Sol - GHG Reports - AB 900

Hi Poonam/Mark,

Provided attached is the revised GHG Technical Study for the Tierra del Sol Solar Project per comments received. We have provided a word document in strike-out/underline, clean PDF and response to comment table.

Let us know if you have any questions.

Thanks

David

David Hochart

Environmental Compliance Manager

**DUDEK** | Natural Resource Management | Infrastructure Development | Regulatory Compliance |

605 Third Street

Encinitas, CA 92024

T: 760. 479. 4259

C: 760. 415.2864

[www.dudek.com](http://www.dudek.com)

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**Greenhouse Gas Analysis  
Tierra del Sol Solar Farm Project  
Major Use Permit 3300-12-010  
Rezone 3600-12-005  
Boulevard, San Diego County, California**

*Project Proponent:*

**Tierra del Sol LLC**  
c/o Soitec Solar Development LLC  
4250 Executive Square, Suite 770  
San Diego, California 92037

*Prepared by:*

**DUDEK**  
605 Third Street  
Encinitas, California 92024  
Contact: David Deckman

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FEBRUARY 2013



# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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## GLOSSARY OF TERMS AND ACRONYMS

AB	Assembly Bill
CAFE	Corporate Average Fuel Economy
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAR	California Climate Action Registry
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> E	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CPV	concentrating photovoltaic
CH <sub>4</sub>	methane
CEQA	California Environmental Quality Act
EPA	Environmental Protection Agency
GHG	greenhouse gas
GWP	global warming potential
HFC	hydrofluorocarbon
kW	kilowatt
mpg	miles per gallon
MUP	Major Use Permit
MSCP	Multiple Species Conservation Program
MW	megawatts
NF <sub>3</sub>	nitrogen trifluoride
NHTSA	National Highway Traffic Safety Administration
N <sub>2</sub> O	nitrous oxide
O <sub>3</sub>	ozone
O&M	operations and maintenance
OPR	Governor's Office of Planning and Research
PFC	perfluorocarbon
RFS	Renewable Fuel Standard
SDG&E	San Diego Gas & Electric
SDAPCD	San Diego County Air Pollution Control District
SDCGHGI	San Diego County Greenhouse Gas Inventory
SF <sub>6</sub>	sulfur hexafluoride

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U.S.	United States
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
V	volt
VMT	vehicle miles traveled

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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## EXECUTIVE SUMMARY

The proposed Tierra Del Sol Solar Farm Project (project) would produce up to 60 megawatts (MW) (alternating current) of electricity and would consist of approximately 2,657 concentrating photovoltaic (CPV) trackers on 420 acres in southeastern San Diego County near the unincorporated community of Boulevard, California. As proposed, the project will be developed in two phases. Phase I would include the construction and operation of 45 MW on approximately 330 acres. Phase II would consist of the construction and operation of 15 MW on approximately 90 acres.

The greenhouse gas (GHG) analysis evaluates the potential for significant adverse impacts related to GHG emissions and climate change as a result of the proposed project's construction and operational emissions.

GHG emissions generated by the proposed project associated with construction equipment and vehicles, operations and maintenance vehicular traffic, electrical generation, and water supply were estimated. The amortized annual construction emissions are included in the overall GHG emission estimates. The estimated GHG emissions would be 557 metric tons carbon dioxide equivalent (CO<sub>2</sub>E) per year. As such, project emissions would not exceed the 900-metric-ton threshold as indicated in the County of San Diego's DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan (County of San Diego 2010a), which was used as guidance for determining significance of GHG emissions from project implementation.

Based on estimates by the project proponent, the project would generate 2,083 kilowatt-hours alternating current annually per installed kilowatt (based on the direct current capacity of the CPV trackers). This factor reflects the available daylight hours, conversion of direct current to alternating current, and various system losses. Using the installed CPV capacity of 80 MW (80,000 kilowatts) direct current, the project is anticipated to generate 166,640,000 kilowatts per year. The proposed project would provide a potential reduction of 81,334 metric tons CO<sub>2</sub>E per year if the electricity generated by the proposed project were to be used instead of electricity generated by fossil-fuel sources. After accounting for the amortized construction and annual operational emissions of 557 metric tons CO<sub>2</sub>E per year, the net reduction in GHG emissions would be 80,777 metric tons CO<sub>2</sub>E per year. This reduction is not considered in the significance determination of the proposed project's GHG emissions but is provided for disclosure purposes.

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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## 1.0 INTRODUCTION

### 1.1 Purpose of the Report

The purpose of this report is to estimate and evaluate the greenhouse gas (GHG) emission impacts associated with construction and operation of the proposed project and their potential contribution to climate change. Impacts relative to climate change are evaluated based on guidance provided in the County of San Diego's (County's) *DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan* (County of San Diego 2010a).

### 1.2 Project Location and Description

#### Solar Farm

The proposed project is situated south of Tierra Del Sol Road and immediately north of the US/Mexico International Border, approximately 3.5 miles south of SR-94 in the eastern portion of unincorporated San Diego County. Figure 1, Regional Map, shows the project's relationship within San Diego County. Figure 2, Vicinity Map, shows the project's relationship to the surrounding unincorporated community of Boulevard.

The proposed Tierra Del Sol Solar Farm Project (project) would produce up to 60 megawatts (MW) (alternating current) of solar energy and would consist of approximately 2,657 concentrating photovoltaic (CPV) trackers on 420 acres in southeastern San Diego County near the unincorporated community of Boulevard, California. As proposed, the project will be developed in two phases. Phase I would include the construction and operation of 45 MW (1,993 CPV trackers) on approximately 330 acres. Phase II would consist of the construction and operation of 15 MW (664 CPV trackers) on approximately 90 acres (Figure 3, Preliminary Site Plan). The project includes a Major Use Permit (MUP) to authorize a Major Impact Utility Pursuant to Sections 1350, 2705, and 2926 of the Zoning Ordinance. The project will also require a Rezone to remove Special Area Designator "A" and ensure compliance with Section 5100 of the Zoning Ordinance. An Agricultural Preserve Disestablishment will also be required to develop the project site as proposed.

Individual tracker dimensions are approximately 48 feet across by 25 feet tall. Each CPV Tracker unit would be mounted on a 28-inch steel mast (steel pole), which would be supported by either (i) extending it into the ground up to 20 feet and encasing it in concrete, or (ii) attaching it to a concrete foundation sized to be suitable to adequately support the CPV Tracker based on wind loading and soil conditions at the site. The preferred method would be to set the mast by vibratory pile driving methods depending upon soil conditions.

## **Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project**

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In its most vertical position and depending on foundation design, the top of each tracker would not exceed 30 feet above grade, and the lower edge would not be less than 1 foot above ground level. In its horizontal “stow” mode (for high winds), each tracker would have a minimum ground clearance of 13 feet 6 inches.

Power from the CPV system in each building block would be delivered from each tracker to a conversion station through a 1,000 volt (V) DC underground collection system. The underground 1,000 V DC collection system construction footprint would include a trench of 1 to 2 feet in width and a depth of up to approximately 4 feet. It is anticipated that power from the CPV systems on site would be separated into three 34.5-kilovolt (kV) underground collection circuits, each delivering approximately 20 MW of power to the project substation.

Each 34.5 kV underground branch circuit associated with Phase I would connect to a 34.5 kV overhead trunk line on the project site for delivery to the project substation. These two collection circuits for Phase I would be run overhead on an above ground trunk line adjacent to the south side of the Southwest Power Link right of way. This trunk line would be approximately 1.2 miles long and would have two 34.5 kV circuits and deliver a total of 45 MW. The above ground trunk line would utilize steel poles and would be approximately 50 to 75 feet high and spaced about 300 to 500 feet apart. The minimum ground clearance of the 34.5 kV lines would be 30 feet. The maximum hole dimensions for steel pole foundations would be 24 inches in diameter and approximately 20 feet deep. Phase 2 will connect to the project substation entirely via one 34.5 kV underground branch circuit and the underground 34.5 kV collection system construction footprint would include a trench of three to four feet in width and a depth of up to approximately four feet. Base material would be installed in all trenches to (i) ensure adequate drainage, and (ii) to ensure sufficient thermal conductivity and electrical insulating characteristics below and above collection system cables.

The project will include construction of a 34.5/138 kV step-up substation site (located within the northeast corner of the project site and adjacent to the operations and maintenance (O&M) annex site), which would increase the voltage received from the overhead and underground collector system from 34.5 to 138 kV. Switching and transformer equipment as well as a control house and a parking area for utility vehicles would be located within the 3-acre substation site and for security purposes (and to allow for nighttime inspections) lighting would be installed near substation equipment, the control shelter, and on the entrance gates.

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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Figure 1      Regional Map

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# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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Figure 2 Vicinity Map

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Figure 3 Preliminary Site Plan

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## **Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project**

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A backup power and storm positioning system would bring the CPV system into the horizontal position (“storm position”) in case the electrical power is cut or if there is an approaching storm that could be damaging to the CPV System. The backup power and storm positioning system would consist of two redundant systems: (1) two independent sets of emergency generators, or (2) two independent sources of utility-supplied power. If emergency generators would be used, they would be nominally rated at 680 kilowatts (kW) each.

A 4-acre O&M annex site would be located adjacent to the substation site and would house operations and maintenance supplies, telecommunications equipment and rest facilities all within a 7,500-square-foot, single-story building. It is anticipated that in-place tracker washing would occur every 6 to 8 weeks by mobile crews who will also be available for dispatch whenever on-site repairs or other maintenance are required. Tracker washing will be undertaken using a tanker truck and smaller “satellite” tracker washing trucks. On-site water storage tanks may be installed to facilitate washing.

Project construction would consist of several phases including site preparation, development of staging areas and site access roads, solar CPV assembly and installation, and construction of electrical transmission facilities. The project would require a total of approximately 352 acres of site preparation activities prior to solar CPV installation, in addition to approximately 66 acres of fire buffer preparation involving non-motorized brush clearing techniques. After site preparation, initial project construction would include the development of the staging and assembly areas, and the grading of site access roads for initial CPV installation. The project would be constructed over a period of up to approximately 12 months, which includes both Phase I and II.

### **Gen-Tie Line**

Power from the on-site private substation would be delivered to the 138 kV bus at SDG&E’s rebuilt Boulevard Substation via an approximate 6.5-mile 138 kV transmission line or gen-tie line within a 125-foot private right-of-way. The 138 kV transmission line would travel in a roughly northeasterly direction over private land from the on-site private substation to SDG&E’s rebuilt Boulevard Substation.

The gen-tie alignment would require the setting of new steel transmission poles and conductor installed along the poles to deliver power from the project site to the nearest substation. Access to each steel pole location would be constructed prior to clearing activities. Once access has been established, temporary work area measuring 80 feet x 80 feet around each steel pole location would be cleared of vegetation in order to assist in pole installation.

## **Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project**

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Each transmission line pole would have a maximum height of 97 feet depending upon location. The span lengths between poles would be dependent on terrain. The cable span lengths would generally be 650 feet. Given the project alignment is approximately 6 miles it is anticipated the gen-tie would require construction of approximately 49 steel poles.

Several of the pole site locations are accessible from existing dirt access roads; however, new access roads will need to be constructed at some pole locations. Based on a preliminary design, it is anticipated that approximately 1.5 miles of new access roads will be required for construction of the steel poles. The total disturbance associated with access roads, pull sites and staging areas is anticipated to be approximately 18.2 acres.

To install the steel poles for the gen-tie, access roads will need to be constructed to access pole locations where existing access roads are not present. Steel poles will be installed into the excavation which is likely to be around 10 to 20 feet deep, depending on the soils and height of the pole. Holes will be formed via use of a truck-mounted auger and will excavate between 8 to 12 cubic yards of soil. Poles will then be delivered to the site via a flat-bed truck and lifted into place with a crane. The gap between the excavation and steel pole will then be backfilled with concrete.

Conductor wire stringing will be completed following pole installation. The work will be primarily completed from bucket trucks and pull sites located along the right of way. Rollers will be temporarily attached to the lower end of the insulators to allow the conductor to be pulled along the line. A rope will then be pulled onto the rollers from structure to structure. Once the rope is in place, it will be attached to a steel cable and pulled back through the sheaves. The conductor will then be attached and pulled back through the sheaves and into place using conventional tractor-trailer pulling equipment located at pull and tension sites along the line. The pulling through each structure will be done under a controlled tension to keep it elevated and away from obstacles.

Construction of the gen-tie alignment is anticipated to take place over a 6-month period, commencing immediately after the first construction phase, which includes site demolition, clearing, grubbing, grinding, and road construction. Access road construction will occur for the first 2 months of construction followed by pole foundation excavation and installation for 2 months and conductor stringing for 2 months.

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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## 2.0 EXISTING CONDITIONS

### 2.1 Existing Setting

#### Project Site

The project is situated south of Tierra Del Sol Road and immediately north of the United States (U.S.)–Mexico International Border and is traversed by San Diego Gas & Electric’s 500 kV Southwest Power Link, which consists of 4 lattice steel towers. The site area lies within the Tierra Del Sol U.S. Geological Survey (USGS) 7.5-minute quadrangle, Township 18 South, Range 6 East, Section 13.

The project site is undeveloped but has remnants of some small structures associated with previous ranching activities located near the western portion and middle of the project site that would be demolished during construction. The entire project site is fenced. The U.S.–Mexico border fence is located adjacent to the southern portion of the project site. The area is accessed through locked gates and dirt roads that traverse the project site. Nearby sensitive receptors include single-family residences located adjacent to the project site.

The project site is located in a desert transition zone dominated by the chaparral plant community. The site was previously utilized for an active ranching operation. The project site is within the Boulevard Community Planning Area of San Diego County’s General Plan; the land use designation is Rural with a permitted density of 1 dwelling unit per 80 acres. Existing zoning is General Rural (S92) and Agriculture (A72). The Boulevard planning area requires a minimum lot size of 1 unit per eight acres due to the County’s Groundwater Ordinance. The site is located at an elevation of approximately 3,700 to 3,566 feet above mean sea level. The project site is located within San Diego County’s draft East County Multiple Species Conservation Program (MSCP) Plan Area. The majority of the project site was previously disturbed by extensive grazing activities; however, chaparral vegetation has become more established which provides moderate value for wildlife species.

### 2.2 The Greenhouse Effect and Greenhouse Gases

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind, lasting for an extended period (decades or longer).

Gases that trap heat in the atmosphere are often called “greenhouse gases” (GHGs). The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long-wave radiation; and GHGs in the upper atmosphere absorb this long-wave

## Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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radiation and emit it into space and toward the Earth. This “trapping” of the long-wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect. Principal GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), ozone (O<sub>3</sub>), and water vapor (H<sub>2</sub>O). Some GHGs, such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO<sub>2</sub> and CH<sub>4</sub> are emitted in the greatest quantities from human activities. Emissions of CO<sub>2</sub> are largely byproducts of fossil fuel combustion, whereas CH<sub>4</sub> results mostly from off-gassing associated with agricultural practices and landfills. Man-made GHGs, which have a much greater heat-absorption potential than CO<sub>2</sub>, include fluorinated gases, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>), which are associated with certain industrial products and processes (CAT 2006).

The greenhouse effect is a natural process that contributes to regulating the earth’s temperature. Without it, the temperature of the Earth would be about 0°F (-18°C) instead of its present 57°F (14°C). Global climate change concerns are focused on whether human activities are leading to an enhancement of the greenhouse effect (National Climatic Data Center 2009).

The effect each GHG has on climate change is measured as a combination of the mass of its emissions and the potential of a gas or aerosol to trap heat in the atmosphere, known as its “global warming potential” (GWP). GWP varies between GHGs; for example, the GWP of CH<sub>4</sub> is 21, and the GWP of N<sub>2</sub>O is 310. Total GHG emissions are expressed as a function of how much warming would be caused by the same mass of CO<sub>2</sub>. Thus, GHG gas emissions are typically measured in terms of pounds or tons of “CO<sub>2</sub> equivalent” (CO<sub>2</sub>E).<sup>1</sup>

### 2.3 Contributions to Greenhouse Gas Emissions

In 2010, the United States produced 6,822 million metric tons of CO<sub>2</sub>E (MMT CO<sub>2</sub>E) (EPA 2012). The primary GHG emitted by human activities in the United States was CO<sub>2</sub>, representing approximately 84% of total GHG emissions. The largest source of CO<sub>2</sub>, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 94% of the CO<sub>2</sub> emissions and 78% of overall GHG emissions.

According to the 2009 GHG inventory data compiled by the California Air Resources Board (CARB) for the California Greenhouse Gas Inventory for 2000–2009, California emitted 457 MMT CO<sub>2</sub>E of GHGs, including emissions resulting from out-of-state electrical generation (CARB 2011). The primary contributors to GHG emissions in California are transportation,

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<sup>1</sup> The CO<sub>2</sub> equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, such that MTCO<sub>2</sub>E = (metric tons of a GHG) x (GWP of the GHG). For example, the GWP for CH<sub>4</sub> is 21. This means that emissions of 1 metric ton of methane are equivalent to emissions of 21 metric tons of CO<sub>2</sub>.

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electric power production from both in-state and out-of-state sources, industry, agriculture and forestry, and other sources, which include commercial and residential activities. These primary contributors to California's GHG emissions and their relative contributions in 2009 are presented in Table 1, GHG Sources in California.

**Table 1  
GHG Sources in California**

Source Category	Annual GHG Emissions (MMT CO <sub>2</sub> E)	% of Total
Agriculture	32.13	7.03%
Commercial and residential	42.95	9.40%
Electricity generation	103.58a	22.68%
Forestry (excluding sinks)	0.19	0.04%
Industrial uses	81.36	17.81%
Recycling and waste	7.32	1.60%
Transportation	172.92	37.86%
High-GWP substances	16.32	3.57%
<b>Totals</b>	<b>456.77</b>	<b>100.00%</b>

Source: CARB 2011.

Notes: <sup>a</sup> Includes emissions associated with imported electricity, which account for 48.05 MMTCO<sub>2</sub>E annually.

### 2.4 Potential Effects of Human Activity on Climate Change

According to CARB, some of the potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high O<sub>3</sub> days, more large forest fires, and more drought years (CARB 2006). Several recent studies have attempted to explore the possible negative consequences that climate change, left unchecked, could have in California. These reports acknowledge that climate scientists' understanding of the complex global climate system, and the interplay of the various internal and external factors that affect climate change, remains too limited to yield scientifically valid conclusions on such a localized scale. Substantial work has been done at the international and national level to evaluate climatic impacts, but far less information is available on regional and local impacts.

The primary effect of global climate change has been a rise in average global tropospheric temperature of 0.2°C per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling using 2000 emission rates shows that further warming would occur, which would induce further changes in the global climate system during the current century. Changes to the global climate system and ecosystems and to California would include, but would not be limited to:

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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- The loss of sea ice and mountain snowpack resulting in higher sea levels and higher sea surface evaporation rates with a corresponding increase in tropospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures (IPCC 2007)
- A rise in global average sea level primarily due to thermal expansion and melting of glaciers and ice caps and the Greenland and Antarctic ice sheets (IPCC 2007)
- Changes in weather that includes widespread changes in precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones (IPCC 2007)
- A decline of Sierra snowpack, which accounts for approximately half of the surface water storage in California, by 70% to as much as 90% over the next 100 years (CAT 2006)
- An increase in the number of days conducive to O<sub>3</sub> formation by 25% to 85% (depending on the future temperature scenario) in high O<sub>3</sub> areas of Los Angeles and the San Joaquin Valley by the end of the 21st century (CAT 2006)
- High potential for erosion of California's coastlines and sea water intrusion into the Delta and levee systems due to the rise in sea level (CAT 2006).

## 2.5 Regulatory Setting

### 2.5.1 Federal Activities

*Massachusetts vs. EPA.* On April 2, 2007, in *Massachusetts v. EPA*, the Supreme Court directed the U.S. Environmental Protection Agency (EPA) Administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the EPA Administrator is required to follow the language of Section 202(a) of the federal Clean Air Act. On December 7, 2009, the Administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- The Administrator found that elevated concentrations of GHGs—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the “endangerment finding.”
- The Administrator further found the combined emissions of GHGs—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the “cause or contribute finding.”

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These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

***Energy Independence and Security Act.*** On December 19, 2007, President Bush signed the Energy Independence and Security Act of 2007. Among other key measures, the Act would do the following, which would aid in the reduction of national GHG emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022
2. Set a target of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020 and directs National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks
3. Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

***EPA and NHTSA Joint Final Rule for Vehicle Standards.*** On April 1, 2010, the EPA and NHTSA announced a joint final rule to establish a national program consisting of new standards for light-duty vehicles model years 2012 through 2016. The joint rule is intended to reduce GHG emissions and improve fuel economy. The EPA is finalizing the first-ever national GHG emissions standards under the Clean Air Act, and NHTSA is finalizing Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act (EPA 2010). This final rule follows the EPA and Department of Transportation's joint proposal on September 15, 2009, and is the result of the President Obama's May 2009 announcement of a national program to reduce greenhouse gases and improve fuel economy (EPA 2011). The final rule became effective on July 6, 2010 (EPA and NHTSA 2010).

The EPA GHG standards require new passenger cars, light-duty trucks, and medium-duty passenger vehicles to meet an estimated combined average emissions level of 250 grams of CO<sub>2</sub> per mile in model year 2016, equivalent to 35.5 mpg if the automotive industry were to meet this CO<sub>2</sub> level through fuel economy improvements alone. The CAFE standards for passenger cars and light trucks will be phased in between 2012 and 2016, with the final standards equivalent to 37.8 mpg for passenger cars and 28.8 mpg for light trucks, resulting in an estimated combined average of 34.1 mpg. Together, these standards will cut GHG emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program. The rules will simultaneously reduce GHG

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emissions, improve energy security, increase fuel savings, and provide clarity and predictability for manufacturers (EPA 2011).

In 2011, the EPA and NHTSA approved the first-ever program to reduce GHG emissions and increase fuel efficiency for medium- and heavy-duty vehicles (EPA and NHTSA 2011). Effective November 14, 2011, the CO<sub>2</sub> emissions and fuel efficiency standards of this regulation apply to model year 2014 to 2018 combination tractors (i.e., semi-trucks), heavy-duty pickup trucks and vans, and vocational vehicles including transit and school buses. This regulation covers vehicles with a gross vehicle weight rating of 8,500 pounds or greater; medium-duty passenger vehicles are covered by the previous regulation for passenger cars and light-duty trucks. In addition, the EPA has adopted standards to control HFC leakage from air conditioning systems in combination tractors and heavy-duty pickup trucks and vans as well as CH<sub>4</sub> and N<sub>2</sub>O standards for heavy-duty engines, pickup trucks, and vans. Phased in through model year 2017, the CO<sub>2</sub> and fuel consumption standards for combination trailers depend on the weight class, cab type, and roof length. The CO<sub>2</sub> standards are expressed in grams CO<sub>2</sub> per ton-mile, while the fuel consumption standards are expressed in gallons per 1,000 ton-miles, each accounting for the carrying capacity of the tractor and trailer. These standards represent an overall fuel consumption and CO<sub>2</sub> emissions reduction of up to 23% when compared to a baseline 2010 model year. The CO<sub>2</sub> and fuel consumption standards for heavy-duty pickup trucks and vans are applied as corporate average values and are phased in with increasing stringency from model year 2014 to 2018. The final EPA standards for heavy-duty pickup trucks and vans for 2018 (including a separate standard to control air conditioning system leakage) represent a GHG reduction of 17% for diesel vehicles and 12% for gasoline vehicles compared to a 2010 baseline. Due to the variety of vocational vehicles, many of which involve a body installed on a chassis, the CO<sub>2</sub> and fuel consumption standards are applied to the chassis manufacturers. Like the CO<sub>2</sub> and fuel consumption standards for combination tractors, the standards for vocation vehicles are expressed in grams CO<sub>2</sub> per ton-mile and gallons per 1,000 ton-miles, respectively. Upon final implementation, the EPA standards for vocational vehicles, which apply initially to model year 2014 to 2016 and then to model year 2017 vehicles, are expected to reduce GHG emissions by 6 to 9% compared to a 2010 baseline.

In August 2012, the EPA and NHTSA approved a second round of GHG and CAFE standards for model years 2017 and beyond (EPA and NHTSA 2012). These standards will reduce motor vehicle GHG emissions to 163 grams of CO<sub>2</sub> per mile, which is equivalent to 54.5 mpg if this level were achieved solely through improvements in fuel efficiency, for cars and light-duty trucks by model year 2025. A portion of these improvements, however, will likely be made through improvements in air conditioning leakage and through use of alternative refrigerants, which would not contribute to fuel economy. The first phase of the CAFE standards, for model year 2017 to 2021, are projected to require, on an average industry fleet-wide basis, a range from

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40.3 to 41.0 mpg in model year 2021. The second phase of the CAFE program, for model years 2022 to 2025, are projected to require, on an average industry fleet-wide basis, a range from 48.7 to 49.7 mpg in model year 2025. The second phase of standards have not been finalized due to the statutory requirement that NHTSA set average fuel economy standards not more than five model years at a time. The regulations also include targeted incentives to encourage early adoption and introduction into the marketplace of advanced technologies to dramatically improve vehicle performance, including:

- Incentives for electric vehicles, plug-in hybrid electric vehicles, and fuel cells vehicles
- Incentives for hybrid technologies for large pickups and for other technologies that achieve high fuel economy levels on large pickups
- Incentives for natural gas vehicles
- Credits for technologies with potential to achieve real-world greenhouse gas reductions and fuel economy improvements that are not captured by the standards test procedures.

### 2.5.2 State of California

**Assembly Bill (AB) 1493.** In a response to the transportation sector accounting for more than half of California's CO<sub>2</sub> emissions, AB 1493 (Pavley) was enacted on July 22, 2002. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. When fully phased in, the near-term (2009–2012) standards will result in a reduction of about 22% in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term (2013–2016) standards will result in a reduction of about 30%.

Before these regulations could go into effect, the EPA had to grant California a waiver under the federal Clean Air Act, which ordinarily preempts state regulation of motor vehicle emission standards. The waiver was granted by Lisa Jackson, the EPA Administrator, on June 30, 2009. On March 29, 2010, the CARB Executive Officer approved revisions to the motor vehicle GHG standards to harmonize the state program with the national program for 2012–2016 model years (see “EPA and NHTSA Joint Final Rule for Vehicle Standards” above). The revised regulations became effective on April 1, 2010.

**Executive Order S-3-05.** In June 2005, Governor Schwarzenegger established California's GHG emissions reduction targets in Executive Order S-3-05. The Executive Order established the following goals: GHG emissions should be reduced to 2000 levels by 2010; GHG emissions

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should be reduced to 1990 levels by 2020; and GHG emissions should be reduced to 80% below 1990 levels by 2050. CalEPA Secretary is required to coordinate efforts of various agencies to collectively and efficiently reduce GHGs. The Climate Action Team is responsible for implementing global warming emissions reduction programs. Representatives from several state agencies comprise the Climate Action Team. The Climate Action Team fulfilled its report requirements through the March 2006 Climate Action Team Report to the governor and the legislature (CAT 2006). A second draft biennial report was released in April 2009.

The 2009 Draft Climate Action Team Report (CAT 2009) expands on the policy outlined in the 2006 assessment. The 2009 report provides new information and scientific findings regarding the development of new climate and sea-level projections using new information and tools that have recently become available and evaluates climate change within the context of broader soil changes, such as land use changes and demographics. The 2009 report also identifies the need for additional research in several different aspects that affect climate change in order to support effective climate change strategies. The aspects of climate change determined to require future research include vehicle and fuel technologies, land use and smart growth, electricity and natural gas, energy efficiency, renewable energy and reduced carbon energy sources, low GHG technologies for other sectors, carbon sequestration, terrestrial sequestration, geologic sequestration, economic impacts and considerations, social science, and environmental justice.

**AB 32.** In furtherance of the goals established in Executive Order S-3-05, the legislature enacted AB 32 (Núñez and Pavley), the California Global Warming Solutions Act of 2006, which Governor Schwarzenegger signed on September 27, 2006. The GHG emissions limit is equivalent to the 1990 levels, which are to be achieved by 2020.

CARB has been assigned to carry out and develop the programs and requirements necessary to achieve the goals of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions. This program will be used to monitor and enforce compliance with the established standards. CARB is also required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 allows CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

The first action under AB 32 resulted in the adoption of a report listing early action GHG emission reduction measures on June 21, 2007. The early actions include three specific GHG control rules. On October 25, 2007, CARB approved an additional six early action GHG reduction measures under AB 32. The three original early-action regulations meeting the narrow legal definition of “discrete early action GHG reduction measures” include:

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1. A low-carbon fuel standard to reduce the “carbon intensity” of California fuels
2. Reduction of refrigerant losses from motor vehicle air conditioning system maintenance to restrict the sale of “do-it-yourself” automotive refrigerants
3. Increased methane capture from landfills to require broader use of state-of-the-art methane capture technologies.

The additional six early-action regulations, which were also considered “discrete early action GHG reduction measures,” consist of:

1. Reduction of aerodynamic drag, and thereby fuel consumption, from existing trucks and trailers through retrofit technology
2. Reduction of auxiliary engine emissions of docked ships by requiring port electrification
3. Reduction of PFCs from the semiconductor industry
4. Reduction of propellants in consumer products (e.g., aerosols, tire inflators, and dust removal products)
5. Requirements that all tune-up, smog check and oil change mechanics ensure proper tire inflation as part of overall service in order to maintain fuel efficiency
6. Restriction on the use of SF<sub>6</sub> from non-electricity sectors if viable alternatives are available.

As required under AB 32, on December 6, 2007, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was set at 427 million metric tons CO<sub>2</sub>E. In addition to the 1990 emissions inventory, CARB also adopted regulations requiring mandatory reporting of GHGs for large facilities that account for 94% of GHG emissions from industrial and commercial stationary sources in California. About 800 separate sources fall under the new reporting rules and include electricity generating facilities, electricity retail providers and power marketers, oil refineries, hydrogen plants, cement plants, cogeneration facilities, and other industrial sources that emit CO<sub>2</sub> in excess of specified thresholds.

On December 11, 2008, CARB approved the Climate Change Proposed Scoping Plan: A Framework for Change (Scoping Plan; CARB 2008) to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program.

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The key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards
- Achieving a statewide renewables energy mix of 33%
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long term commitment to AB 32 implementation.

**SB 1368.** In September 2006, Governor Schwarzenegger signed SB 1368, which requires the California Energy Commission (CEC) to develop and adopt regulations for GHG emissions performance standards for the long-term procurement of electricity by local publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission (CPUC). This effort will help protect energy customers from financial risks associated with investments in carbon-intensive generation by allowing new capital investments in power plants whose GHG emissions are as low or lower than new combined-cycle natural gas plants, by requiring imported electricity to meet GHG performance standards in California, and by requiring that the standards be developed and adopted in a public process.

**SB 97.** In August 2007, the legislature enacted SB 97 (Dutton), which directs the Governor's Office of Planning and Research (OPR) to develop guidelines under the California Environmental Quality Act (CEQA) for the mitigation of GHG emissions. OPR was to develop proposed guidelines by July 1, 2009, and the Natural Resources Agency was directed to adopt the guidelines by January 1, 2010.

On June 19, 2008, OPR issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents (OPR 2008). The advisory indicated that a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities, should be identified and estimated. The advisory further recommended that the lead agency determine significance of the impacts and impose all mitigation measures that are necessary to reduce GHG emissions to a level that is less than significant.

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The Natural Resources Agency adopted the CEQA Guidelines Amendments on December 30, 2009. The amendments became effective on March 18, 2010. The amended guidelines establish several new CEQA requirements concerning the analysis of GHGs, including the following:

- Requiring a lead agency to “make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project” (Section 15064(a))
- Providing a lead agency with the discretion to determine whether to use quantitative or qualitative analysis or performance standards to determine the significance of GHG emissions resulting from a particular project (Section 15064.4(a))
- Requiring a lead agency to consider the following factors when assessing the significant impacts from greenhouse gas emissions on the environment:
  - The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
  - Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
  - The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. (Section 15064.4(b))
- Allowing lead agencies to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures, including offsets that are not otherwise required (Section 15126.4(c)).

The amended guidelines also establish two new guidance questions regarding GHG emissions in the Environmental Checklist set forth in CEQA Guidelines Appendix G:

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The adopted amendments do not establish a GHG emission threshold, and instead allow a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by

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other agencies or experts.<sup>2</sup> The Natural Resources Agency also acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions.<sup>3</sup>

**Executive Order S-14-08.** On November 17, 2008, Governor Schwarzenegger issued Executive Order S-14-08. This Executive Order focuses on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. The governor's order requires that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. Furthermore, the order directs state agencies to take appropriate actions to facilitate reaching this target. The Resources Agency, through collaboration with the CEC and California Department of Fish and Wildlife (CDFW), is directed to lead this effort. Pursuant to a Memorandum of Understanding between the CEC and CDFW creating the Renewable Energy Action Team, these agencies will create a "one-stop" process for permitting renewable energy power plants.

**SB XI 2.** On April 12, 2011, Governor Jerry Brown signed SB XI 2 in the First Extraordinary Session, which would expand the RPS by establishing a goal of 20% of the total electricity sold to retail customers in California per year, by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current and that meets other specified requirements with respect to its location. In addition to the retail sellers covered by SB 107, SB XI 2 adds local publicly owned electric utilities to the RPS. By January 1, 2012, the CPUC is required to establish the quantity of electricity products from eligible renewable energy resources to be procured by retail sellers in order to achieve targets of 20% by December 31, 2013; 25% by December 31, 2016; and 33% by December 31, 2020. The statute also requires that the governing boards for local publicly owned electric utilities establish the same targets, and the governing boards would be responsible for ensuring compliance with these targets. The CPUC will be responsible for enforcement of the RPS for retail sellers, while the CEC and CARB will enforce the requirements for local publicly owned electric utilities.

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<sup>2</sup> "The CEQA Guidelines do not establish thresholds of significance for other potential environmental impacts, and SB 97 did not authorize the development of a statement threshold as part of this CEQA Guidelines update. Rather, the proposed amendments recognize a lead agency's existing authority to develop, adopt and apply their own thresholds of significance or those developed by other agencies or experts" (California Natural Resources Agency 2009, p. 84).

<sup>3</sup> "A project's compliance with regulations or requirements implementing AB 32 or other laws and policies is not irrelevant. Section 15064.4(b)(3) would allow a lead agency to consider compliance with requirements and regulations in the determination of significance of a project's greenhouse gas emissions" (California Natural Resources Agency 2009, p. 100).

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## 2.5.3 County of San Diego

### County of San Diego Climate Action Plan

The County of San Diego Climate Action Plan (CAP), adopted June 2012, documents the County's long-term strategy for addressing the adverse effects of climate change (County of San Diego 2012). The CAP outlines various mechanisms and measures for reducing GHG emissions at the County level, including those specific to water conservation, waste reduction, land use, and adaptation strategies to fulfill the obligations delineated in AB 32. The CAP includes County goals previously established under the County General Plan and County Strategic Energy Plan, and establishes reduction targets at 15% below 2005 levels by 2020 and 49% below 2005 levels by 2035. The CAP builds on long-standing efforts, including state initiatives, County staff recommendations, and regional planning strategies to enhance environmental sustainability and carbon neutrality, particularly unincorporated segments of the County. As shown in Table 2, GHG Sources in San Diego County, unincorporated San Diego County emitted approximately 4.51 MMT CO<sub>2</sub>E of GHGs in 2005. Similar to the statewide emissions inventory, the transportation sector was the largest contributor to GHG emissions in 2005 accounting for approximately 59% of total GHG emissions (more than 2.6 MMT CO<sub>2</sub>E). Emission sources and emission estimates by sector are shown in Table 2.

**Table 2**  
**GHG Sources in San Diego County**

Source Category	Annual GHG Emissions (MMT CO <sub>2</sub> E)	% of Total
Transportation	2.64	59%
Agriculture	0.19	4%
Solid Waste	0.14	3%
Wastewater	0.05	1%
Potable Water	0.24	5%
Other	0.13	3%
Energy	1.12	25%
<b>Totals</b>	<b>4.51</b>	<b>100.00%</b>

Source: County of San Diego 2012.

### San Diego County Greenhouse Gas Inventory

The University of San Diego School of Law's Energy Policy Initiative Center (University of San Diego 2008) prepared a regional GHG inventory. This San Diego County Greenhouse Gas Inventory (SDCGHGI) consisted of a detailed inventory that took into account the unique characteristics of the region in calculating emissions. The study found that emissions of GHGs must be reduced by 33% below business as usual in order for San Diego County to achieve 1990 emission levels by 2020.

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## 3.0 SIGNIFICANCE CRITERIA AND ANALYSIS METHODOLOGIES

### 3.1 State of California

The State of California has developed guidelines to address the significance of climate change impacts based on Appendix G of the CEQA Guidelines, which provides guidance that a project would have a significant environmental impact if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Neither the State of California nor the San Diego County Air Pollution Control District (SDAPCD) has adopted emission-based thresholds for GHG emissions under CEQA. OPR's Technical Advisory titled *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review* states that "public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact" (OPR 2008, p. 4). Furthermore, the advisory document indicates in the third bullet item on page 6 that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice."

### 3.2 County Climate Change Analysis Screening Criteria

As indicated in the County's *DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan* (County of San Diego 2010a), any commercial or light industrial use that exceeds a screening criteria threshold of 900 metric tons of carbon dioxide equivalent (CO<sub>2</sub>E)<sup>4</sup> per year would be required to prepare a Climate Change analysis. The 900-metric-ton threshold for determining when a more detailed climate change analysis is required was chosen based on available guidance from the California Air Pollution Control Officers

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<sup>4</sup> The CO<sub>2</sub> equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, such that metric tons CO<sub>2</sub>E = (metric tons of a GHG) x (GWP of the GHG). For example, the GWP for CH<sub>4</sub> is 21. This means that emissions of 1 metric ton of methane are equivalent to emissions of 21 metric tons of CO<sub>2</sub>.

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Association (CAPCOA) white paper on addressing GHG emissions under CEQA (CAPCOA 2008). The CAPCOA white paper references a 900-metric-ton guideline as a conservative threshold for requiring further analysis and mitigation. Table 3, Project Size Thresholds, shows the general sizes of projects that would generally require a more detailed climate change analysis based on the 900-metric-ton threshold.

**Table 3  
Project Size Thresholds**

Project Type	Size
Single-Family Residential	50 units
Apartments / Condominiums	70 units
General Commercial Office Space	35,000 square feet
Retail Space	11,000 square feet
Supermarket / Grocery Space	6,300 square feet

Source: County of San Diego DPLU 2010

If a project meets the above size criteria or does not exceed 900 metric tons CO<sub>2</sub>e per year, then the climate change impacts would be considered less than significant.

For project's whose emissions exceed the screening threshold, the project needs to demonstrate that it would reduce overall GHG emissions to 33% below business as usual. The 33% reductions should be an overall reduction for operational emissions, construction-related emissions, and vehicular-related GHG emissions (County of San Diego 2010a). Construction emissions are to be amortized over a project life of 30 years and added to the operational emissions. Business as usual is defined as the emissions that would be generated prior to AB 32 related emission restrictions.

This approach ensures that new development with the potential to make cumulatively considerable contributions to climate change will incorporate appropriate mitigation measures and not result in a conflict with the goals of AB 32.

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## 4.0 PROJECT IMPACT ANALYSIS

The significance criteria described in Section 3.0 were used to evaluate impacts associated with the construction and operation of the proposed project.

### 4.1 Significance of Impacts Prior to Mitigation

The project proponent has stated that the project is scheduled to commence construction in April 2014 and would be completed within approximately 1 year for both Phase I and Phase II. Construction phases and associated durations were provided by the project proponent and include the following subphases:

- Site demolition and clearing, grubbing, grinding, and road construction (10 weeks)
- Underground electric/communications cable installation (17 weeks)
- Tracker installation – 45 MW (20 weeks)
- Tracker installation – 15 MW (7 weeks)
- Substation construction (17 weeks)
- Operations and maintenance building construction (13 weeks)
- Gen-tie (10 weeks, commencing prior to site demolition/clearing/ grubbing/grinding/ road construction).

Project completion is anticipated in April 2015, although construction of Phase II could be completed at a later date. Details of the construction schedule including heavy construction equipment hours of operation and duration, worker trips, and equipment mix are included in Appendix A.

The equipment mix anticipated for construction activity was based on information provided by the applicant and best engineering judgment. The equipment mix is meant to represent a reasonably conservative estimate of construction activity.

Operation of the project would involve in-place tracker washing that would occur every 6 to 8 weeks by mobile crews who will also be available for dispatch whenever on-site repairs or other maintenance are required. Tracker washing will be undertaken using a tanker truck and smaller “satellite” tracker washing trucks. On-site water storage tanks may be installed to facilitate washing. A 4-acre O&M annex site would be located adjacent to the substation site and would house operations and maintenance supplies, telecommunications equipment and rest facilities all within a single-story building.

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Maintenance and repair activities for transmission facilities would include both routine preventive maintenance and emergency procedures conducted to maintain system integrity, as well as vegetation clearing. Activities anticipated to occur are described in more detail below.

*Pole or Structure Brushing.* Certain poles or structures would require the removal of vegetation to increase aerial patrol effectiveness or to reduce fire danger. Vegetation would be removed using mechanical equipment, such as chainsaws, weed trimmers, rakes, shovels, and brush hooks. A crew of three workers would typically conduct this work. A 100-foot-diameter area around each transmission structure would be required. Poles are typically inspected on an annual basis to determine if vegetation removal around poles is required.

*Application of Herbicides.* To prevent vegetation from reoccurring around structures, Soitec may use herbicides in accordance with SDG&E's Herbicides and Application Procedures. The utility SDG&E normally utilizes one or more of 16 herbicides. These herbicides are identified in a U.S. Fish and Wildlife Service (USFWS) letter to SDG&E, along with their recommendations. The application of herbicides generally requires one person and takes only minutes to spray around the base of the pole within a radius of approximately 10 feet. The employee would either walk from the nearest access road to apply the herbicide or drive a pick-up truck directly to each pole location as access permits.

*Equipment Repair and Replacement.* Poles or structures support a variety of equipment, such as conductors, insulators, switches, transformers, lightning arrest devices, line junctions, and other electrical equipment. In order to maintain uniform, adequate, safe, and reliable service, electrical equipment may need to be added, repaired, or replaced during operations. An existing transmission structure may be removed and replaced with a larger/stronger structure at the same location or a nearby location, due to damage or changes in conductor size. Equipment repair or replacement generally requires a crew to gain access to the location of the equipment to be repaired or replaced. The crew normally consists of four people with two to three trucks, a boom or line truck, an aerial-lift truck, and an assist truck. If no vehicle access exists, the crew and material are flown in by helicopter.

*Insulator Washing.* The 138 kV transmission line would use polymer insulators that do not require washing.

*Use of Helicopters.* Each electric transmission line is inspected several times a year via helicopter. Helicopters may also be used to deliver equipment, position poles and structures, string lines, and position aerial markers, as required by Federal Aviation Administration regulations.

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## 4.2 Construction GHG Emissions

GHG emissions would be associated with the construction phase of the proposed project (solar farm and gen-tie line) through use of construction equipment and vehicle trips. Emissions of CO<sub>2</sub> from off-road equipment used the construction phase of the project were estimated using emission rates derived using CARB's offroad equipment model, OFFROAD2007, available online (<http://www.arb.ca.gov/msei/offroad/offroad.htm>). Emissions of all pollutants from on-road trucks and passenger vehicles were estimated using emission factors derived using CARB's motor vehicle emission inventory program, EMFAC2011, available online (<http://www.arb.ca.gov/msei/modeling.htm>).

Vehicle miles traveled (VMT) for paved road travel by workers are based on a 35-mile commute distance from Alpine, El Centro, and surrounding areas<sup>5</sup>, and equipment delivery truck VMT are based on 85-mile one-way routes from Rancho Bernardo where equipment deliveries would originate.<sup>6</sup>

The results were adjusted to estimate CH<sub>4</sub> and N<sub>2</sub>O emissions in addition to CO<sub>2</sub>. The CO<sub>2</sub> emissions from off-road equipment and vehicles and delivery trucks, which are assumed to be diesel fueled, were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for diesel fuel as reported in the California Climate Action Registry's (CCAR) General Reporting Protocol for transportation fuels and the global warming potential for each GHG (CCAR 2009). The CO<sub>2</sub> emissions associated with construction worker trips were multiplied by a factor based on the assumption that CO<sub>2</sub> represents 95% of the CO<sub>2</sub>E emissions associated with passenger vehicles (EPA 2005). The results were then converted from annual tons per year to metric tons per year. Table 4, Estimated Construction GHG Emissions, shows the estimated annual GHG construction emissions associated with the proposed project, as well as the 30-year amortized construction emissions.

**Table 4**  
**Estimated Construction GHG Emissions (metric tons/year)**

Construction Year	CO <sub>2</sub> E Emissions
2014	2,783.86
2015	626.98
30-year amortized emissions	113.69

Source: OFFROAD2007, EMFAC 2011. See Appendix A for complete results.

<sup>5</sup> The average of the distances from Alpine and El Centro is 46 miles. This distance was reduced by 25% to reflect worker commute trips from local housing (temporary or permanent) for an average worker commute distance of 35 miles.

<sup>6</sup> VMT = one-way miles × 2 × number of trips

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## 4.3 Operational GHG Emissions

The following section discusses the calculations of GHG emissions resulting from the primary sources of GHGs associated with the operation of the proposed project. Operation of the project would produce GHG emissions associated with worker vehicles, personnel transport vehicles, washing vehicles (heavy-duty diesel water trucks), satellite washing vehicles (light-duty diesel trucks), service trucks, emergency generators, electricity consumption, and water supply during operation and maintenance for the solar project. Operation of the gen-tie would include pole/structure brushing, herbicide application, equipment repair using heavy-duty diesel trucks and light-duty diesel trucks, and biannual helicopter inspections. GHG emissions from natural gas use and creation of solid waste are not associated with the proposed project. At the present time, specific substation devices, such as transformers and circuit breakers, have not been identified; however, the substation is not expected to include any equipment that uses SF<sub>6</sub>, which is a GHG associated with high-voltage switching devices at some substations. Should substation devices contain SF<sub>6</sub>, SDG&E has implemented maintenance and repair practices that have resulted in a system-wide average leakage rate of 0.29%, which would minimize SF<sub>6</sub> emissions. It is anticipated that the project proponent would employ similar practices.

### 4.3.1 Motor Vehicles

The proposed project would impact air quality through the vehicular traffic generated by operations and maintenance vehicles including worker vehicles, on-site personnel transport vehicles, washing vehicles and a service truck. Worker trip distances for operation and maintenance of the solar farm were conservatively estimated for the model inputs as originating in Alpine, El Centro, and surrounding areas (approximately 35 miles one-way as discussed in Section 4.2). All other operation and maintenance vehicles were assumed to be staged at a location near the project site, resulting in an estimated 10 miles per day of maintenance activities per vehicle. Maintenance vehicles associated with the gen-tie line were assumed to originate in Alpine plus the length of the gen-tie line (6 miles) for a total of 41 miles one-way. Maintenance activities for the gen-tie line were assumed to occur twice a month, and periodic repair activities were assumed to occur one week (5 days) per year.

Annual CO<sub>2</sub> emissions from motor vehicle trips associated with the proposed project were quantified using EMFAC2011. The CO<sub>2</sub> emissions from diesel-fueled washing vehicles were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for diesel fuel as reported in the CCAR's General Reporting Protocol for transportation fuels and the global warming potential for each GHG (CCAR 2009). CH<sub>4</sub> and N<sub>2</sub>O emissions from all other motor vehicles during operation of the project were accounted for by multiplying the estimated CO<sub>2</sub> emissions by a factor based on the assumption that CO<sub>2</sub> represents 95% of the CO<sub>2</sub>E emissions associated with passenger vehicles (EPA 2005). As summarized in Table 5, Estimated Operational GHG

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Emissions, total annual operational GHG emissions from motor vehicles would be 111.34 metric tons CO<sub>2</sub>E per year. Additional detail regarding these calculations can be found in Appendix A.

## 4.3.2 Helicopters

Helicopters would be used for surveillance and inspection of the gen-tie line. To best represent helicopter emissions during maintenance and inspection activities, a Bell 206 helicopter was used for the purposes of calculating annual CO<sub>2</sub> emissions. Annual CO<sub>2</sub> emissions from helicopter use were calculated based on fuel consumption of a Bell 206 model aircraft and the CO<sub>2</sub> emission factor for aviation gasoline as reported in the CCAR's *General Reporting Protocol* for transportation fuels (CCAR 2009). The GHG emissions estimate is based on two inspections of the gen-tie line, each lasting approximately 8 hours. The CO<sub>2</sub> emissions from use of helicopters were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for aviation gasoline as reported in the CCAR's *General Reporting Protocol* for transportation fuels and the global warming potential for each GHG (CCAR 2009).

## 4.3.3 Diesel Generators

Operational emissions would result from intermittent use of two 680 kW diesel-powered emergency generators for maintenance and testing purposes. Each generator would be run for testing and maintenance approximately one hour each week for a total of 50 hours per year. Generator engines would meet the EPA standards for Tier 2 engines as required by the CARB Airborne Toxic Control Measure for new and in-use stationary diesel engines. The CO<sub>2</sub> emission factor was obtained from Section 3.4 (Large Stationary Diesel and All Stationary Dual-fuel Engines) of the EPA's *Compilation of Air Pollutant Emission Factors* (EPA 1996). The CO<sub>2</sub> emissions from diesel combustion were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for natural gas as reported in the CCAR's *General Reporting Protocol* (CCAR 2009) for stationary combustion fuels and their GWPs. The estimated emissions from the emergency generator engines are shown in Table 5. Refer to Appendix A for additional information.

## 4.3.4 Electrical Generation

Annual electricity use for the proposed O&M annex was based upon estimated generation rates for land uses in the SDG&E service area (see Appendix A). In addition, the trackers (e.g., control units, motors) and other devices (e.g., inverters, field communications) common to each building block of trackers would use electricity to be provided by SDG&E (see Appendix A). The project proponent provided the estimated ratings of the devices and their operating schedule. Annual usage was determined depending on the period that devices would operate (e.g., daylight hours only). The generation of electricity through combustion of fossil fuels typically results in emissions of

## **Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project**

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CO<sub>2</sub> and to a smaller extent CH<sub>4</sub> and N<sub>2</sub>O. Annual electricity emissions were estimated using the reported CO<sub>2</sub> emissions per kilowatt-hour for SDG&E (SDG&E 2010), which would provide electricity for the project, adjusted to reflect 33% renewable energy in 2020. The contributions of CH<sub>4</sub> and N<sub>2</sub>O for powerplants in California were obtained from the CCAR's General Reporting Protocol (CCAR 2009), which were adjusted for their GWPs. The proposed project would consume an estimated 1,095,859 kilowatt-hours per year, generating approximately 275.04 metric tons CO<sub>2</sub>E annually as shown in Table 5 (see Appendix A for complete results).

### **4.3.5 Water Supply and Wastewater**

Water supplied to the proposed project would be obtained from an on-site well, which would require the use of electricity. Annual water use for the proposed project for the O&M annex and washing the CPV trackers was based upon information provided by the project proponent and would result in a water consumption rate of approximately 3.68 acre-feet per year. The estimated electrical usage associated with water supply was obtained from a CEC report on electricity associated with water supply in California (CEC 2006). An electricity usage factor representing supply and conveyance of locally supplied water in Northern California was assumed to be applicable (the factor for Southern California water assumes that water would be provided from the State Water Project, which is not the case for this project). GHG emissions from electrical generation were calculated as described in Section 4.3.3. As shown in Table 5, annual water use would result in approximately 1.96 metric tons CO<sub>2</sub>E per year (see Appendix A).

GHG emissions associated with wastewater treatment using a septic tank were estimated based on data provided in the *County of San Diego Design Manual for Onsite Wastewater Treatment Systems* (County of San Diego 2010b) and a CH<sub>4</sub> emission factor derived from *CalEEMod User's Guide* (Environ 2011). Estimated annual wastewater treatment would result in approximately 0.09 metric tons CO<sub>2</sub>E per year (see Appendix A).

### **4.3.6 Summary of GHG Emissions**

As shown in Table 5, total annual GHG emissions from construction and operation of the proposed project would be approximately 556.63 metric tons CO<sub>2</sub>E per year.

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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**Table 5**  
**Estimated Operational GHG Emissions (metric tons/year)**

Source	CO <sub>2</sub> E Emissions
Motor Vehicles	111.34
Helicopters	3.53
Emergency Generators	50.97
Electrical Generation	275.04
Water Supply	1.96
Wastewater	0.09
30-year amortized construction emissions	113.69
<b>Total</b>	<b>556.63</b>

Source: EMFAC2011; CCAR 2009; EPA 2005; CEC 2006 . See Appendix A for complete results.

Because the total project GHG emissions would not exceed the County’s screening threshold of 900 metric tons CO<sub>2</sub>E, the impact would be less than significant.

## 4.4 Project Design Features and Mitigation Measures

No mitigation measures would be required.

## 4.5 GHG Emission Benefits

In keeping with the renewable energy target under the Scoping Plan and as required by SB X1 2, the proposed project would provide a source of renewable energy to achieve the Renewable Portfolio Standard of 33% by 2020. Renewable energy, in turn, potentially offsets GHG emissions generated by fossil-fuel power plants. Based on estimates by the project proponent, the project would generate 2,083 kilowatt-hours alternating current annually per installed kilowatt (based on the direct current capacity of the CPV trackers). This factor reflects the available daylight hours, conversion of direct current to alternating current, and various system losses. Using the installed CPV capacity of 80 MW (80,000 kW) direct current, the project is anticipated to generate 166,640,000 kW per year. A GHG factor for fossil-fuel-generated electricity was developed based on reported CO<sub>2</sub> emissions per kilowatt-hour for SDG&E in 2008 (SDG&E 2010) and an adjustment to reflect electricity from renewable energy, large hydroelectric, and nuclear sources in 2009 (SDG&E n.d.), which do not generate GHG emissions. The CO<sub>2</sub> factor for fossil-fuel-generated electricity would be 1.071 pounds CO<sub>2</sub> per kilowatt-hour. The contributions of CH<sub>4</sub> and N<sub>2</sub>O for powerplants in California were obtained from the CCAR’s *General Reporting Protocol* (CCAR 2009), which were adjusted for their GWPs. Thus, the proposed project would provide a potential reduction of 81,334 metric tons CO<sub>2</sub>E per year if the electricity generated by the proposed project were to be used instead of electricity generated by fossil-fuel sources.

## **Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project**

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Additional detail regarding these calculations can be found in Appendix A. After accounting for the amortized construction and annual operational emissions of 557 metric tons CO<sub>2</sub>E per year, the net reduction in GHG emissions would be 80,777 metric tons CO<sub>2</sub>E per year. This reduction is not considered in the significance determination of the proposed project's GHG emissions but is provided for disclosure purposes.

### **4.6 Conclusion**

The proposed project's potential effect on global climate change was evaluated, and GHG emissions were estimated. The project is estimated to result in construction and operational GHG emissions of approximately 557 metric tons CO<sub>2</sub>E. As such, the proposed project would not exceed the 900-metric-ton threshold as described in the *DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan*, and it is therefore not likely to impede the implementation of AB 32. The project would therefore have a less-than-significant impact on climate change.

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## 6.0 LIST OF PREPARERS

David Deckman	Director of Air Quality Services
Jennifer Longabaugh	Environmental Planner
Hannah Westwood	Publications Services

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APPENDIX A  
*Greenhouse Gas Emission Calculations*



**Greenhouse Gas Analysis  
Tierra del Sol Solar Farm Project  
Major Use Permit 3300-12-010  
Rezone 3600-12-005  
Boulevard, San Diego County, California**

*Project Proponent:*

**Tierra del Sol LLC**  
c/o Soitec Solar Development LLC  
4250 Executive Square, Suite 770  
San Diego, California 92037

*Prepared by:*

**DUDEK**  
605 Third Street  
Encinitas, California 92024  
Contact: David Deckman

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FEBRUARY 2013



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## GLOSSARY OF TERMS AND ACRONYMS

AB	Assembly Bill
CAFE	Corporate Average Fuel Economy
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAR	California Climate Action Registry
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> E	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CPV	concentrating photovoltaic
CH <sub>4</sub>	methane
CEQA	California Environmental Quality Act
EPA	Environmental Protection Agency
GHG	greenhouse gas
GWP	global warming potential
HFC	hydrofluorocarbon
kW	kilowatt
mpg	miles per gallon
MUP	Major Use Permit
MSCP	Multiple Species Conservation Program
MW	megawatts
NF <sub>3</sub>	nitrogen trifluoride
NHTSA	National Highway Traffic Safety Administration
N <sub>2</sub> O	nitrous oxide
O <sub>3</sub>	ozone
O&M	operations and maintenance
OPR	Governor's Office of Planning and Research
PFC	perfluorocarbon
RFS	Renewable Fuel Standard
SDG&E	San Diego Gas & Electric
SDAPCD	San Diego County Air Pollution Control District
SDCGHGI	San Diego County Greenhouse Gas Inventory
SF <sub>6</sub>	sulfur hexafluoride

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U.S.	United States
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
V	volt
VMT	vehicle miles traveled

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## EXECUTIVE SUMMARY

The proposed Tierra Del Sol Solar Farm Project (project) would produce up to 60 megawatts (MW) (alternating current) of electricity and would consist of approximately 2,657 concentrating photovoltaic (CPV) trackers on 420 acres in southeastern San Diego County near the unincorporated community of Boulevard, California. As proposed, the project will be developed in two phases. Phase I would include the construction and operation of 45 MW on approximately 330 acres. Phase II would consist of the construction and operation of 15 MW on approximately 90 acres.

The greenhouse gas (GHG) analysis evaluates the potential for significant adverse impacts related to GHG emissions and climate change as a result of the proposed project's construction and operational emissions.

GHG emissions generated by the proposed project associated with construction equipment and vehicles, operations and maintenance vehicular traffic, electrical generation, and water supply were estimated. The amortized annual construction emissions are included in the overall GHG emission estimates. The estimated GHG emissions would be 557 metric tons carbon dioxide equivalent (CO<sub>2</sub>E) per year. As such, project emissions would not exceed the 900-metric-ton threshold as indicated in the County of San Diego's DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan (County of San Diego 2010a), which was used as guidance for determining significance of GHG emissions from project implementation.

Based on estimates by the project proponent, the project would generate 2,083 kilowatt-hours alternating current annually per installed kilowatt (based on the direct current capacity of the CPV trackers). This factor reflects the available daylight hours, conversion of direct current to alternating current, and various system losses. Using the installed CPV capacity of 80 MW (80,000 kilowatts) direct current, the project is anticipated to generate 166,640,000 kilowatts per year. The proposed project would provide a potential reduction of 81,334 metric tons CO<sub>2</sub>E per year if the electricity generated by the proposed project were to be used instead of electricity generated by fossil-fuel sources. After accounting for the amortized construction and annual operational emissions of 557 metric tons CO<sub>2</sub>E per year, the net reduction in GHG emissions would be 80,777 metric tons CO<sub>2</sub>E per year. This reduction is not considered in the significance determination of the proposed project's GHG emissions but is provided for disclosure purposes.

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## 1.0 INTRODUCTION

### 1.1 Purpose of the Report

The purpose of this report is to estimate and evaluate the greenhouse gas (GHG) emission impacts associated with construction and operation of the proposed project and their potential contribution to climate change. Impacts relative to climate change are evaluated based on guidance provided in the County of San Diego's (County's) *DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan* (County of San Diego 2010a).

### 1.2 Project Location and Description

#### Solar Farm

The proposed project is situated south of Tierra Del Sol Road and immediately north of the US/Mexico International Border, approximately 3.5 miles south of SR-94 in the eastern portion of unincorporated San Diego County. Figure 1, Regional Map, shows the project's relationship within San Diego County. Figure 2, Vicinity Map, shows the project's relationship to the surrounding unincorporated community of Boulevard.

The proposed Tierra Del Sol Solar Farm Project (project) would produce up to 60 megawatts (MW) (alternating current) of solar energy and would consist of approximately 2,657 concentrating photovoltaic (CPV) trackers on 420 acres in southeastern San Diego County near the unincorporated community of Boulevard, California. As proposed, the project will be developed in two phases. Phase I would include the construction and operation of 45 MW (1,993 CPV trackers) on approximately 330 acres. Phase II would consist of the construction and operation of 15 MW (664 CPV trackers) on approximately 90 acres (Figure 3, Preliminary Site Plan). The project includes a Major Use Permit (MUP) to authorize a Major Impact Utility Pursuant to Sections 1350, 2705, and 2926 of the Zoning Ordinance. The project will also require a Rezone to remove Special Area Designator "A" and ensure compliance with Section 5100 of the Zoning Ordinance. An Agricultural Preserve Disestablishment will also be required to develop the project site as proposed.

Individual tracker dimensions are approximately 48 feet across by 25 feet tall. Each CPV Tracker unit would be mounted on a 28-inch steel mast (steel pole), which would be supported by either (i) extending it into the ground up to 20 feet and encasing it in concrete, or (ii) attaching it to a concrete foundation sized to be suitable to adequately support the CPV Tracker based on wind loading and soil conditions at the site. The preferred method would be to set the mast by vibratory pile driving methods depending upon soil conditions.

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In its most vertical position and depending on foundation design, the top of each tracker would not exceed 30 feet above grade, and the lower edge would not be less than 1 foot above ground level. In its horizontal “stow” mode (for high winds), each tracker would have a minimum ground clearance of 13 feet 6 inches.

Power from the CPV system in each building block would be delivered from each tracker to a conversion station through a 1,000 volt (V) DC underground collection system. The underground 1,000 V DC collection system construction footprint would include a trench of 1 to 2 feet in width and a depth of up to approximately 4 feet. It is anticipated that power from the CPV systems on site would be separated into three 34.5-kilovolt (kV) underground collection circuits, each delivering approximately 20 MW of power to the project substation.

Each 34.5 kV underground branch circuit associated with Phase I would connect to a 34.5 kV overhead trunk line on the project site for delivery to the project substation. These two collection circuits for Phase I would be run overhead on an above ground trunk line adjacent to the south side of the Southwest Power Link right of way. This trunk line would be approximately 1.2 miles long and would have two 34.5 kV circuits and deliver a total of 45 MW. The above ground trunk line would utilize steel poles and would be approximately 50 to 75 feet high and spaced about 300 to 500 feet apart. The minimum ground clearance of the 34.5 kV lines would be 30 feet. The maximum hole dimensions for steel pole foundations would be 24 inches in diameter and approximately 20 feet deep. Phase 2 will connect to the project substation entirely via one 34.5 kV underground branch circuit and the underground 34.5 kV collection system construction footprint would include a trench of three to four feet in width and a depth of up to approximately four feet. Base material would be installed in all trenches to (i) ensure adequate drainage, and (ii) to ensure sufficient thermal conductivity and electrical insulating characteristics below and above collection system cables.

The project will include construction of a 34.5/138 kV step-up substation site (located within the northeast corner of the project site and adjacent to the operations and maintenance (O&M) annex site), which would increase the voltage received from the overhead and underground collector system from 34.5 to 138 kV. Switching and transformer equipment as well as a control house and a parking area for utility vehicles would be located within the 3-acre substation site and for security purposes (and to allow for nighttime inspections) lighting would be installed near substation equipment, the control shelter, and on the entrance gates.

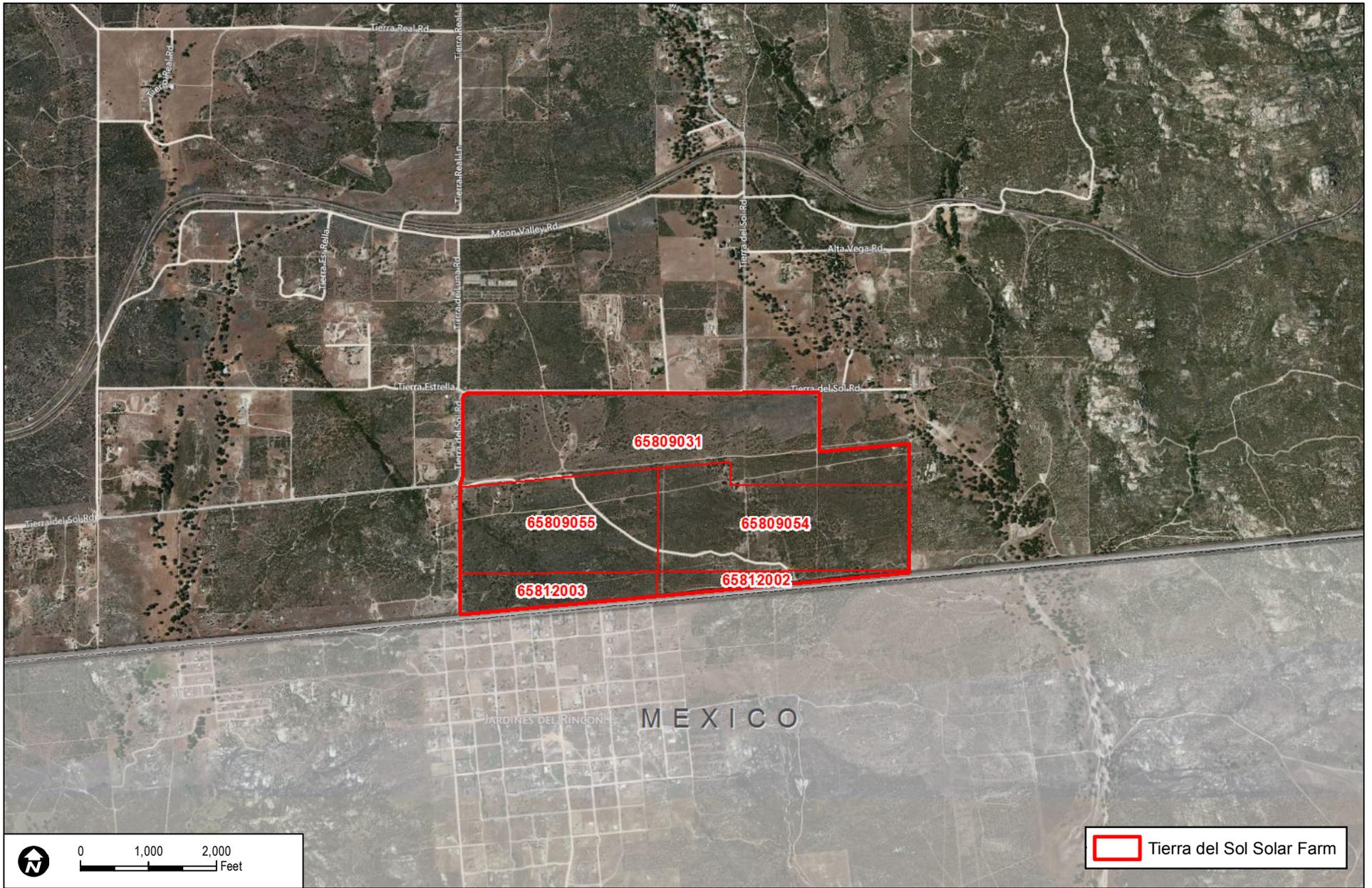


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TIERRA DEL SOL AIR QUALITY TECHNICAL REPORT

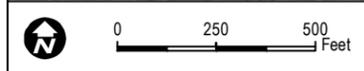
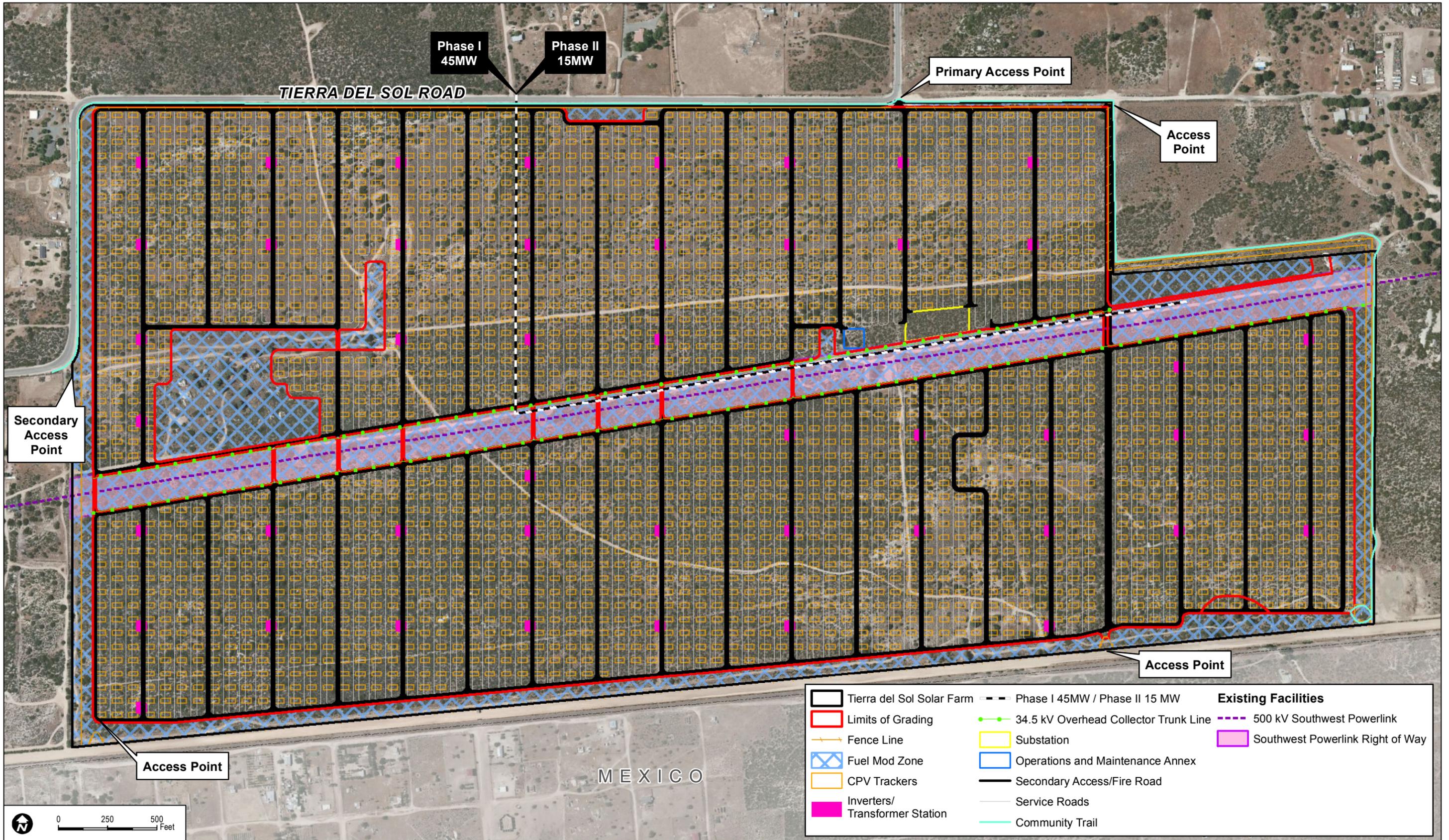
**FIGURE 1**  
**Regional Map**



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DUDEK SOURCE: SanGIS 2011; AECOM 2012; Soitec 2012; Bing Maps

FIGURE 3 Preliminary Site Plan

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## **Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project**

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A backup power and storm positioning system would bring the CPV system into the horizontal position (“storm position”) in case the electrical power is cut or if there is an approaching storm that could be damaging to the CPV System. The backup power and storm positioning system would consist of two redundant systems: (1) two independent sets of emergency generators, or (2) two independent sources of utility-supplied power. If emergency generators would be used, they would be nominally rated at 680 kilowatts (kW) each.

A 4-acre O&M annex site would be located adjacent to the substation site and would house operations and maintenance supplies, telecommunications equipment and rest facilities all within a 7,500-square-foot, single-story building. It is anticipated that in-place tracker washing would occur every 6 to 8 weeks by mobile crews who will also be available for dispatch whenever on-site repairs or other maintenance are required. Tracker washing will be undertaken using a tanker truck and smaller “satellite” tracker washing trucks. On-site water storage tanks may be installed to facilitate washing.

Project construction would consist of several phases including site preparation, development of staging areas and site access roads, solar CPV assembly and installation, and construction of electrical transmission facilities. The project would require a total of approximately 352 acres of site preparation activities prior to solar CPV installation, in addition to approximately 66 acres of fire buffer preparation involving non-motorized brush clearing techniques. After site preparation, initial project construction would include the development of the staging and assembly areas, and the grading of site access roads for initial CPV installation. The project would be constructed over a period of up to approximately 12 months, which includes both Phase I and II.

### **Gen-Tie Line**

Power from the on-site private substation would be delivered to the 138 kV bus at SDG&E’s rebuilt Boulevard Substation via an approximate 6.5-mile 138 kV transmission line or gen-tie line within a 125-foot private right-of-way. The 138 kV transmission line would travel in a roughly northeasterly direction over private land from the on-site private substation to SDG&E’s rebuilt Boulevard Substation.

The gen-tie alignment would require the setting of new steel transmission poles and conductor installed along the poles to deliver power from the project site to the nearest substation. Access to each steel pole location would be constructed prior to clearing activities. Once access has been established, temporary work area measuring 80 feet x 80 feet around each steel pole location would be cleared of vegetation in order to assist in pole installation.

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Each transmission line pole would have a maximum height of 97 feet depending upon location. The span lengths between poles would be dependent on terrain. The cable span lengths would generally be 650 feet. Given the project alignment is approximately 6 miles it is anticipated the gen-tie would require construction of approximately 49 steel poles.

Several of the pole site locations are accessible from existing dirt access roads; however, new access roads will need to be constructed at some pole locations. Based on a preliminary design, it is anticipated that approximately 1.5 miles of new access roads will be required for construction of the steel poles. The total disturbance associated with access roads, pull sites and staging areas is anticipated to be approximately 18.2 acres.

To install the steel poles for the gen-tie, access roads will need to be constructed to access pole locations where existing access roads are not present. Steel poles will be installed into the excavation which is likely to be around 10 to 20 feet deep, depending on the soils and height of the pole. Holes will be formed via use of a truck-mounted auger and will excavate between 8 to 12 cubic yards of soil. Poles will then be delivered to the site via a flat-bed truck and lifted into place with a crane. The gap between the excavation and steel pole will then be backfilled with concrete.

Conductor wire stringing will be completed following pole installation. The work will be primarily completed from bucket trucks and pull sites located along the right of way. Rollers will be temporarily attached to the lower end of the insulators to allow the conductor to be pulled along the line. A rope will then be pulled onto the rollers from structure to structure. Once the rope is in place, it will be attached to a steel cable and pulled back through the sheaves. The conductor will then be attached and pulled back through the sheaves and into place using conventional tractor-trailer pulling equipment located at pull and tension sites along the line. The pulling through each structure will be done under a controlled tension to keep it elevated and away from obstacles.

Construction of the gen-tie alignment is anticipated to take place over a 6-month period, commencing immediately after the first construction phase, which includes site demolition, clearing, grubbing, grinding, and road construction. Access road construction will occur for the first 2 months of construction followed by pole foundation excavation and installation for 2 months and conductor stringing for 2 months.

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## 2.0 EXISTING CONDITIONS

### 2.1 Existing Setting

#### Project Site

The project is situated south of Tierra Del Sol Road and immediately north of the United States (U.S.)–Mexico International Border and is traversed by San Diego Gas & Electric’s 500 kV Southwest Power Link, which consists of 4 lattice steel towers. The site area lies within the Tierra Del Sol U.S. Geological Survey (USGS) 7.5-minute quadrangle, Township 18 South, Range 6 East, Section 13.

The project site is undeveloped but has remnants of some small structures associated with previous ranching activities located near the western portion and middle of the project site that would be demolished during construction. The entire project site is fenced. The U.S.–Mexico border fence is located adjacent to the southern portion of the project site. The area is accessed through locked gates and dirt roads that traverse the project site. Nearby sensitive receptors include single-family residences located adjacent to the project site.

The project site is located in a desert transition zone dominated by the chaparral plant community. The site was previously utilized for an active ranching operation. The project site is within the Boulevard Community Planning Area of San Diego County’s General Plan; the land use designation is Rural with a permitted density of 1 dwelling unit per 80 acres. Existing zoning is General Rural (S92) and Agriculture (A72). The Boulevard planning area requires a minimum lot size of 1 unit per eight acres due to the County’s Groundwater Ordinance. The site is located at an elevation of approximately 3,700 to 3,566 feet above mean sea level. The project site is located within San Diego County’s draft East County Multiple Species Conservation Program (MSCP) Plan Area. The majority of the project site was previously disturbed by extensive grazing activities; however, chaparral vegetation has become more established which provides moderate value for wildlife species.

### 2.2 The Greenhouse Effect and Greenhouse Gases

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind, lasting for an extended period (decades or longer).

Gases that trap heat in the atmosphere are often called “greenhouse gases” (GHGs). The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long-wave radiation; and GHGs in the upper atmosphere absorb this long-wave

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radiation and emit it into space and toward the Earth. This “trapping” of the long-wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect. Principal GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), ozone (O<sub>3</sub>), and water vapor (H<sub>2</sub>O). Some GHGs, such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO<sub>2</sub> and CH<sub>4</sub> are emitted in the greatest quantities from human activities. Emissions of CO<sub>2</sub> are largely byproducts of fossil fuel combustion, whereas CH<sub>4</sub> results mostly from off-gassing associated with agricultural practices and landfills. Man-made GHGs, which have a much greater heat-absorption potential than CO<sub>2</sub>, include fluorinated gases, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>), which are associated with certain industrial products and processes (CAT 2006).

The greenhouse effect is a natural process that contributes to regulating the earth’s temperature. Without it, the temperature of the Earth would be about 0°F (-18°C) instead of its present 57°F (14°C). Global climate change concerns are focused on whether human activities are leading to an enhancement of the greenhouse effect (National Climatic Data Center 2009).

The effect each GHG has on climate change is measured as a combination of the mass of its emissions and the potential of a gas or aerosol to trap heat in the atmosphere, known as its “global warming potential” (GWP). GWP varies between GHGs; for example, the GWP of CH<sub>4</sub> is 21, and the GWP of N<sub>2</sub>O is 310. Total GHG emissions are expressed as a function of how much warming would be caused by the same mass of CO<sub>2</sub>. Thus, GHG gas emissions are typically measured in terms of pounds or tons of “CO<sub>2</sub> equivalent” (CO<sub>2</sub>E).<sup>1</sup>

### 2.3 Contributions to Greenhouse Gas Emissions

In 2010, the United States produced 6,822 million metric tons of CO<sub>2</sub>E (MMT CO<sub>2</sub>E) (EPA 2012). The primary GHG emitted by human activities in the United States was CO<sub>2</sub>, representing approximately 84% of total GHG emissions. The largest source of CO<sub>2</sub>, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 94% of the CO<sub>2</sub> emissions and 78% of overall GHG emissions.

According to the 2009 GHG inventory data compiled by the California Air Resources Board (CARB) for the California Greenhouse Gas Inventory for 2000–2009, California emitted 457 MMT CO<sub>2</sub>E of GHGs, including emissions resulting from out-of-state electrical generation (CARB 2011). The primary contributors to GHG emissions in California are transportation,

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<sup>1</sup> The CO<sub>2</sub> equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, such that MTCO<sub>2</sub>E = (metric tons of a GHG) x (GWP of the GHG). For example, the GWP for CH<sub>4</sub> is 21. This means that emissions of 1 metric ton of methane are equivalent to emissions of 21 metric tons of CO<sub>2</sub>.

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electric power production from both in-state and out-of-state sources, industry, agriculture and forestry, and other sources, which include commercial and residential activities. These primary contributors to California's GHG emissions and their relative contributions in 2009 are presented in Table 1, GHG Sources in California.

**Table 1**  
**GHG Sources in California**

Source Category	Annual GHG Emissions (MMT CO <sub>2</sub> E)	% of Total
Agriculture	32.13	7.03%
Commercial and residential	42.95	9.40%
Electricity generation	103.58a	22.68%
Forestry (excluding sinks)	0.19	0.04%
Industrial uses	81.36	17.81%
Recycling and waste	7.32	1.60%
Transportation	172.92	37.86%
High-GWP substances	16.32	3.57%
<b>Totals</b>	<b>456.77</b>	<b>100.00%</b>

Source: CARB 2011.

Notes: <sup>a</sup> Includes emissions associated with imported electricity, which account for 48.05 MMTCO<sub>2</sub>E annually.

### 2.4 Potential Effects of Human Activity on Climate Change

According to CARB, some of the potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high O<sub>3</sub> days, more large forest fires, and more drought years (CARB 2006). Several recent studies have attempted to explore the possible negative consequences that climate change, left unchecked, could have in California. These reports acknowledge that climate scientists' understanding of the complex global climate system, and the interplay of the various internal and external factors that affect climate change, remains too limited to yield scientifically valid conclusions on such a localized scale. Substantial work has been done at the international and national level to evaluate climatic impacts, but far less information is available on regional and local impacts.

The primary effect of global climate change has been a rise in average global tropospheric temperature of 0.2°C per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling using 2000 emission rates shows that further warming would occur, which would induce further changes in the global climate system during the current century. Changes to the global climate system and ecosystems and to California would include, but would not be limited to:

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- The loss of sea ice and mountain snowpack resulting in higher sea levels and higher sea surface evaporation rates with a corresponding increase in tropospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures (IPCC 2007)
- A rise in global average sea level primarily due to thermal expansion and melting of glaciers and ice caps and the Greenland and Antarctic ice sheets (IPCC 2007)
- Changes in weather that includes widespread changes in precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones (IPCC 2007)
- A decline of Sierra snowpack, which accounts for approximately half of the surface water storage in California, by 70% to as much as 90% over the next 100 years (CAT 2006)
- An increase in the number of days conducive to O<sub>3</sub> formation by 25% to 85% (depending on the future temperature scenario) in high O<sub>3</sub> areas of Los Angeles and the San Joaquin Valley by the end of the 21st century (CAT 2006)
- High potential for erosion of California's coastlines and sea water intrusion into the Delta and levee systems due to the rise in sea level (CAT 2006).

## 2.5 Regulatory Setting

### 2.5.1 Federal Activities

*Massachusetts vs. EPA.* On April 2, 2007, in *Massachusetts v. EPA*, the Supreme Court directed the U.S. Environmental Protection Agency (EPA) Administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the EPA Administrator is required to follow the language of Section 202(a) of the federal Clean Air Act. On December 7, 2009, the Administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- The Administrator found that elevated concentrations of GHGs—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the “endangerment finding.”
- The Administrator further found the combined emissions of GHGs—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the “cause or contribute finding.”

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These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

***Energy Independence and Security Act.*** On December 19, 2007, President Bush signed the Energy Independence and Security Act of 2007. Among other key measures, the Act would do the following, which would aid in the reduction of national GHG emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022
2. Set a target of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020 and directs National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks
3. Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

***EPA and NHTSA Joint Final Rule for Vehicle Standards.*** On April 1, 2010, the EPA and NHTSA announced a joint final rule to establish a national program consisting of new standards for light-duty vehicles model years 2012 through 2016. The joint rule is intended to reduce GHG emissions and improve fuel economy. The EPA is finalizing the first-ever national GHG emissions standards under the Clean Air Act, and NHTSA is finalizing Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act (EPA 2010). This final rule follows the EPA and Department of Transportation's joint proposal on September 15, 2009, and is the result of the President Obama's May 2009 announcement of a national program to reduce greenhouse gases and improve fuel economy (EPA 2011). The final rule became effective on July 6, 2010 (EPA and NHTSA 2010).

The EPA GHG standards require new passenger cars, light-duty trucks, and medium-duty passenger vehicles to meet an estimated combined average emissions level of 250 grams of CO<sub>2</sub> per mile in model year 2016, equivalent to 35.5 mpg if the automotive industry were to meet this CO<sub>2</sub> level through fuel economy improvements alone. The CAFE standards for passenger cars and light trucks will be phased in between 2012 and 2016, with the final standards equivalent to 37.8 mpg for passenger cars and 28.8 mpg for light trucks, resulting in an estimated combined average of 34.1 mpg. Together, these standards will cut GHG emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program. The rules will simultaneously reduce GHG

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emissions, improve energy security, increase fuel savings, and provide clarity and predictability for manufacturers (EPA 2011).

In 2011, the EPA and NHTSA approved the first-ever program to reduce GHG emissions and increase fuel efficiency for medium- and heavy-duty vehicles (EPA and NHTSA 2011). Effective November 14, 2011, the CO<sub>2</sub> emissions and fuel efficiency standards of this regulation apply to model year 2014 to 2018 combination tractors (i.e., semi-trucks), heavy-duty pickup trucks and vans, and vocational vehicles including transit and school buses. This regulation covers vehicles with a gross vehicle weight rating of 8,500 pounds or greater; medium-duty passenger vehicles are covered by the previous regulation for passenger cars and light-duty trucks. In addition, the EPA has adopted standards to control HFC leakage from air conditioning systems in combination tractors and heavy-duty pickup trucks and vans as well as CH<sub>4</sub> and N<sub>2</sub>O standards for heavy-duty engines, pickup trucks, and vans. Phased in through model year 2017, the CO<sub>2</sub> and fuel consumption standards for combination trailers depend on the weight class, cab type, and roof length. The CO<sub>2</sub> standards are expressed in grams CO<sub>2</sub> per ton-mile, while the fuel consumption standards are expressed in gallons per 1,000 ton-miles, each accounting for the carrying capacity of the tractor and trailer. These standards represent an overall fuel consumption and CO<sub>2</sub> emissions reduction of up to 23% when compared to a baseline 2010 model year. The CO<sub>2</sub> and fuel consumption standards for heavy-duty pickup trucks and vans are applied as corporate average values and are phased in with increasing stringency from model year 2014 to 2018. The final EPA standards for heavy-duty pickup trucks and vans for 2018 (including a separate standard to control air conditioning system leakage) represent a GHG reduction of 17% for diesel vehicles and 12% for gasoline vehicles compared to a 2010 baseline. Due to the variety of vocational vehicles, many of which involve a body installed on a chassis, the CO<sub>2</sub> and fuel consumption standards are applied to the chassis manufacturers. Like the CO<sub>2</sub> and fuel consumption standards for combination tractors, the standards for vocational vehicles are expressed in grams CO<sub>2</sub> per ton-mile and gallons per 1,000 ton-miles, respectively. Upon final implementation, the EPA standards for vocational vehicles, which apply initially to model year 2014 to 2016 and then to model year 2017 vehicles, are expected to reduce GHG emissions by 6 to 9% compared to a 2010 baseline.

In August 2012, the EPA and NHTSA approved a second round of GHG and CAFE standards for model years 2017 and beyond (EPA and NHTSA 2012). These standards will reduce motor vehicle GHG emissions to 163 grams of CO<sub>2</sub> per mile, which is equivalent to 54.5 mpg if this level were achieved solely through improvements in fuel efficiency, for cars and light-duty trucks by model year 2025. A portion of these improvements, however, will likely be made through improvements in air conditioning leakage and through use of alternative refrigerants, which would not contribute to fuel economy. The first phase of the CAFE standards, for model year 2017 to 2021, are projected to require, on an average industry fleet-wide basis, a range from

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40.3 to 41.0 mpg in model year 2021. The second phase of the CAFE program, for model years 2022 to 2025, are projected to require, on an average industry fleet-wide basis, a range from 48.7 to 49.7 mpg in model year 2025. The second phase of standards have not been finalized due to the statutory requirement that NHTSA set average fuel economy standards not more than five model years at a time. The regulations also include targeted incentives to encourage early adoption and introduction into the marketplace of advanced technologies to dramatically improve vehicle performance, including:

- Incentives for electric vehicles, plug-in hybrid electric vehicles, and fuel cells vehicles
- Incentives for hybrid technologies for large pickups and for other technologies that achieve high fuel economy levels on large pickups
- Incentives for natural gas vehicles
- Credits for technologies with potential to achieve real-world greenhouse gas reductions and fuel economy improvements that are not captured by the standards test procedures.

### 2.5.2 State of California

**Assembly Bill (AB) 1493.** In a response to the transportation sector accounting for more than half of California's CO<sub>2</sub> emissions, AB 1493 (Pavley) was enacted on July 22, 2002. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. When fully phased in, the near-term (2009–2012) standards will result in a reduction of about 22% in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term (2013–2016) standards will result in a reduction of about 30%.

Before these regulations could go into effect, the EPA had to grant California a waiver under the federal Clean Air Act, which ordinarily preempts state regulation of motor vehicle emission standards. The waiver was granted by Lisa Jackson, the EPA Administrator, on June 30, 2009. On March 29, 2010, the CARB Executive Officer approved revisions to the motor vehicle GHG standards to harmonize the state program with the national program for 2012–2016 model years (see “EPA and NHTSA Joint Final Rule for Vehicle Standards” above). The revised regulations became effective on April 1, 2010.

**Executive Order S-3-05.** In June 2005, Governor Schwarzenegger established California's GHG emissions reduction targets in Executive Order S-3-05. The Executive Order established the following goals: GHG emissions should be reduced to 2000 levels by 2010; GHG emissions

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should be reduced to 1990 levels by 2020; and GHG emissions should be reduced to 80% below 1990 levels by 2050. CalEPA Secretary is required to coordinate efforts of various agencies to collectively and efficiently reduce GHGs. The Climate Action Team is responsible for implementing global warming emissions reduction programs. Representatives from several state agencies comprise the Climate Action Team. The Climate Action Team fulfilled its report requirements through the March 2006 Climate Action Team Report to the governor and the legislature (CAT 2006). A second draft biennial report was released in April 2009.

The 2009 Draft Climate Action Team Report (CAT 2009) expands on the policy outlined in the 2006 assessment. The 2009 report provides new information and scientific findings regarding the development of new climate and sea-level projections using new information and tools that have recently become available and evaluates climate change within the context of broader soil changes, such as land use changes and demographics. The 2009 report also identifies the need for additional research in several different aspects that affect climate change in order to support effective climate change strategies. The aspects of climate change determined to require future research include vehicle and fuel technologies, land use and smart growth, electricity and natural gas, energy efficiency, renewable energy and reduced carbon energy sources, low GHG technologies for other sectors, carbon sequestration, terrestrial sequestration, geologic sequestration, economic impacts and considerations, social science, and environmental justice.

**AB 32.** In furtherance of the goals established in Executive Order S-3-05, the legislature enacted AB 32 (Núñez and Pavley), the California Global Warming Solutions Act of 2006, which Governor Schwarzenegger signed on September 27, 2006. The GHG emissions limit is equivalent to the 1990 levels, which are to be achieved by 2020.

CARB has been assigned to carry out and develop the programs and requirements necessary to achieve the goals of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions. This program will be used to monitor and enforce compliance with the established standards. CARB is also required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 allows CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

The first action under AB 32 resulted in the adoption of a report listing early action GHG emission reduction measures on June 21, 2007. The early actions include three specific GHG control rules. On October 25, 2007, CARB approved an additional six early action GHG reduction measures under AB 32. The three original early-action regulations meeting the narrow legal definition of “discrete early action GHG reduction measures” include:

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1. A low-carbon fuel standard to reduce the “carbon intensity” of California fuels
2. Reduction of refrigerant losses from motor vehicle air conditioning system maintenance to restrict the sale of “do-it-yourself” automotive refrigerants
3. Increased methane capture from landfills to require broader use of state-of-the-art methane capture technologies.

The additional six early-action regulations, which were also considered “discrete early action GHG reduction measures,” consist of:

1. Reduction of aerodynamic drag, and thereby fuel consumption, from existing trucks and trailers through retrofit technology
2. Reduction of auxiliary engine emissions of docked ships by requiring port electrification
3. Reduction of PFCs from the semiconductor industry
4. Reduction of propellants in consumer products (e.g., aerosols, tire inflators, and dust removal products)
5. Requirements that all tune-up, smog check and oil change mechanics ensure proper tire inflation as part of overall service in order to maintain fuel efficiency
6. Restriction on the use of SF<sub>6</sub> from non-electricity sectors if viable alternatives are available.

As required under AB 32, on December 6, 2007, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was set at 427 million metric tons CO<sub>2</sub>E. In addition to the 1990 emissions inventory, CARB also adopted regulations requiring mandatory reporting of GHGs for large facilities that account for 94% of GHG emissions from industrial and commercial stationary sources in California. About 800 separate sources fall under the new reporting rules and include electricity generating facilities, electricity retail providers and power marketers, oil refineries, hydrogen plants, cement plants, cogeneration facilities, and other industrial sources that emit CO<sub>2</sub> in excess of specified thresholds.

On December 11, 2008, CARB approved the Climate Change Proposed Scoping Plan: A Framework for Change (Scoping Plan; CARB 2008) to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program.

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The key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards
- Achieving a statewide renewables energy mix of 33%
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long term commitment to AB 32 implementation.

**SB 1368.** In September 2006, Governor Schwarzenegger signed SB 1368, which requires the California Energy Commission (CEC) to develop and adopt regulations for GHG emissions performance standards for the long-term procurement of electricity by local publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission (CPUC). This effort will help protect energy customers from financial risks associated with investments in carbon-intensive generation by allowing new capital investments in power plants whose GHG emissions are as low or lower than new combined-cycle natural gas plants, by requiring imported electricity to meet GHG performance standards in California, and by requiring that the standards be developed and adopted in a public process.

**SB 97.** In August 2007, the legislature enacted SB 97 (Dutton), which directs the Governor's Office of Planning and Research (OPR) to develop guidelines under the California Environmental Quality Act (CEQA) for the mitigation of GHG emissions. OPR was to develop proposed guidelines by July 1, 2009, and the Natural Resources Agency was directed to adopt the guidelines by January 1, 2010.

On June 19, 2008, OPR issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents (OPR 2008). The advisory indicated that a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities, should be identified and estimated. The advisory further recommended that the lead agency determine significance of the impacts and impose all mitigation measures that are necessary to reduce GHG emissions to a level that is less than significant.

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The Natural Resources Agency adopted the CEQA Guidelines Amendments on December 30, 2009. The amendments became effective on March 18, 2010. The amended guidelines establish several new CEQA requirements concerning the analysis of GHGs, including the following:

- Requiring a lead agency to “make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project” (Section 15064(a))
- Providing a lead agency with the discretion to determine whether to use quantitative or qualitative analysis or performance standards to determine the significance of GHG emissions resulting from a particular project (Section 15064.4(a))
- Requiring a lead agency to consider the following factors when assessing the significant impacts from greenhouse gas emissions on the environment:
  - The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
  - Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
  - The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. (Section 15064.4(b))
- Allowing lead agencies to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures, including offsets that are not otherwise required (Section 15126.4(c)).

The amended guidelines also establish two new guidance questions regarding GHG emissions in the Environmental Checklist set forth in CEQA Guidelines Appendix G:

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The adopted amendments do not establish a GHG emission threshold, and instead allow a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by

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other agencies or experts.<sup>2</sup> The Natural Resources Agency also acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions.<sup>3</sup>

**Executive Order S-14-08.** On November 17, 2008, Governor Schwarzenegger issued Executive Order S-14-08. This Executive Order focuses on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. The governor's order requires that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. Furthermore, the order directs state agencies to take appropriate actions to facilitate reaching this target. The Resources Agency, through collaboration with the CEC and California Department of Fish and Wildlife (CDFW), is directed to lead this effort. Pursuant to a Memorandum of Understanding between the CEC and CDFW creating the Renewable Energy Action Team, these agencies will create a "one-stop" process for permitting renewable energy power plants.

**SB XI 2.** On April 12, 2011, Governor Jerry Brown signed SB XI 2 in the First Extraordinary Session, which would expand the RPS by establishing a goal of 20% of the total electricity sold to retail customers in California per year, by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current and that meets other specified requirements with respect to its location. In addition to the retail sellers covered by SB 107, SB XI 2 adds local publicly owned electric utilities to the RPS. By January 1, 2012, the CPUC is required to establish the quantity of electricity products from eligible renewable energy resources to be procured by retail sellers in order to achieve targets of 20% by December 31, 2013; 25% by December 31, 2016; and 33% by December 31, 2020. The statute also requires that the governing boards for local publicly owned electric utilities establish the same targets, and the governing boards would be responsible for ensuring compliance with these targets. The CPUC will be responsible for enforcement of the RPS for retail sellers, while the CEC and CARB will enforce the requirements for local publicly owned electric utilities.

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<sup>2</sup> "The CEQA Guidelines do not establish thresholds of significance for other potential environmental impacts, and SB 97 did not authorize the development of a statement threshold as part of this CEQA Guidelines update. Rather, the proposed amendments recognize a lead agency's existing authority to develop, adopt and apply their own thresholds of significance or those developed by other agencies or experts" (California Natural Resources Agency 2009, p. 84).

<sup>3</sup> "A project's compliance with regulations or requirements implementing AB 32 or other laws and policies is not irrelevant. Section 15064.4(b)(3) would allow a lead agency to consider compliance with requirements and regulations in the determination of significance of a project's greenhouse gas emissions" (California Natural Resources Agency 2009, p. 100).

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## 2.5.3 County of San Diego

### County of San Diego Climate Action Plan

The County of San Diego Climate Action Plan (CAP), adopted June 2012, documents the County’s long-term strategy for addressing the adverse effects of climate change (County of San Diego 2012). The CAP outlines various mechanisms and measures for reducing GHG emissions at the County level, including those specific to water conservation, waste reduction, land use, and adaptation strategies to fulfill the obligations delineated in AB 32. The CAP includes County goals previously established under the County General Plan and County Strategic Energy Plan, and establishes reduction targets at 15% below 2005 levels by 2020 and 49% below 2005 levels by 2035. The CAP builds on long-standing efforts, including state initiatives, County staff recommendations, and regional planning strategies to enhance environmental sustainability and carbon neutrality, particularly unincorporated segments of the County. As shown in Table 2, GHG Sources in San Diego County, unincorporated San Diego County emitted approximately 4.51 MMT CO<sub>2</sub>E of GHGs in 2005. Similar to the statewide emissions inventory, the transportation sector was the largest contributor to GHG emissions in 2005 accounting for approximately 59% of total GHG emissions (more than 2.6 MMT CO<sub>2</sub>E). Emission sources and emission estimates by sector are shown in Table 2.

**Table 2  
GHG Sources in San Diego County**

Source Category	Annual GHG Emissions (MMT CO <sub>2</sub> E)	% of Total
Transportation	2.64	59%
Agriculture	0.19	4%
Solid Waste	0.14	3%
Wastewater	0.05	1%
Potable Water	0.24	5%
Other	0.13	3%
Energy	1.12	25%
<b>Totals</b>	<b>4.51</b>	<b>100.00%</b>

Source: County of San Diego 2012.

### San Diego County Greenhouse Gas Inventory

The University of San Diego School of Law’s Energy Policy Initiative Center (University of San Diego 2008) prepared a regional GHG inventory. This San Diego County Greenhouse Gas Inventory (SDCGHGI) consisted of a detailed inventory that took into account the unique characteristics of the region in calculating emissions. The study found that emissions of GHGs must be reduced by 33% below business as usual in order for San Diego County to achieve 1990 emission levels by 2020.

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## 3.0 SIGNIFICANCE CRITERIA AND ANALYSIS METHODOLOGIES

### 3.1 State of California

The State of California has developed guidelines to address the significance of climate change impacts based on Appendix G of the CEQA Guidelines, which provides guidance that a project would have a significant environmental impact if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Neither the State of California nor the San Diego County Air Pollution Control District (SDAPCD) has adopted emission-based thresholds for GHG emissions under CEQA. OPR's Technical Advisory titled *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review* states that "public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact" (OPR 2008, p. 4). Furthermore, the advisory document indicates in the third bullet item on page 6 that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice."

### 3.2 County Climate Change Analysis Screening Criteria

As indicated in the County's *DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan* (County of San Diego 2010a), any commercial or light industrial use that exceeds a screening criteria threshold of 900 metric tons of carbon dioxide equivalent (CO<sub>2</sub>E)<sup>4</sup> per year would be required to prepare a Climate Change analysis. The 900-metric-ton threshold for determining when a more detailed climate change analysis is required was chosen based on available guidance from the California Air Pollution Control Officers

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<sup>4</sup> The CO<sub>2</sub> equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, such that metric tons CO<sub>2</sub>E = (metric tons of a GHG) x (GWP of the GHG). For example, the GWP for CH<sub>4</sub> is 21. This means that emissions of 1 metric ton of methane are equivalent to emissions of 21 metric tons of CO<sub>2</sub>.

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Association (CAPCOA) white paper on addressing GHG emissions under CEQA (CAPCOA 2008). The CAPCOA white paper references a 900-metric-ton guideline as a conservative threshold for requiring further analysis and mitigation. Table 3, Project Size Thresholds, shows the general sizes of projects that would generally require a more detailed climate change analysis based on the 900-metric-ton threshold.

**Table 3**  
**Project Size Thresholds**

Project Type	Size
Single-Family Residential	50 units
Apartments / Condominiums	70 units
General Commercial Office Space	35,000 square feet
Retail Space	11,000 square feet
Supermarket / Grocery Space	6,300 square feet

Source: County of San Diego DPLU 2010

If a project meets the above size criteria or does not exceed 900 metric tons CO<sub>2</sub>e per year, then the climate change impacts would be considered less than significant.

For project's whose emissions exceed the screening threshold, the project needs to demonstrate that it would reduce overall GHG emissions to 33% below business as usual. The 33% reductions should be an overall reduction for operational emissions, construction-related emissions, and vehicular-related GHG emissions (County of San Diego 2010a). Construction emissions are to be amortized over a project life of 30 years and added to the operational emissions. Business as usual is defined as the emissions that would be generated prior to AB 32 related emission restrictions.

This approach ensures that new development with the potential to make cumulatively considerable contributions to climate change will incorporate appropriate mitigation measures and not result in a conflict with the goals of AB 32.

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## 4.0 PROJECT IMPACT ANALYSIS

The significance criteria described in Section 3.0 were used to evaluate impacts associated with the construction and operation of the proposed project.

### 4.1 Significance of Impacts Prior to Mitigation

The project proponent has stated that the project is scheduled to commence construction in April 2014 and would be completed within approximately 1 year for both Phase I and Phase II. Construction phases and associated durations were provided by the project proponent and include the following subphases:

- Site demolition and clearing, grubbing, grinding, and road construction (10 weeks)
- Underground electric/communications cable installation (17 weeks)
- Tracker installation – 45 MW (20 weeks)
- Tracker installation – 15 MW (7 weeks)
- Substation construction (17 weeks)
- Operations and maintenance building construction (13 weeks)
- Gen-tie (10 weeks, commencing prior to site demolition/clearing/ grubbing/grinding/ road construction).

Project completion is anticipated in April 2015, although construction of Phase II could be completed at a later date. Details of the construction schedule including heavy construction equipment hours of operation and duration, worker trips, and equipment mix are included in Appendix A.

The equipment mix anticipated for construction activity was based on information provided by the applicant and best engineering judgment. The equipment mix is meant to represent a reasonably conservative estimate of construction activity.

Operation of the project would involve in-place tracker washing that would occur every 6 to 8 weeks by mobile crews who will also be available for dispatch whenever on-site repairs or other maintenance are required. Tracker washing will be undertaken using a tanker truck and smaller “satellite” tracker washing trucks. On-site water storage tanks may be installed to facilitate washing. A 4-acre O&M annex site would be located adjacent to the substation site and would house operations and maintenance supplies, telecommunications equipment and rest facilities all within a single-story building.

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Maintenance and repair activities for transmission facilities would include both routine preventive maintenance and emergency procedures conducted to maintain system integrity, as well as vegetation clearing. Activities anticipated to occur are described in more detail below.

*Pole or Structure Brushing.* Certain poles or structures would require the removal of vegetation to increase aerial patrol effectiveness or to reduce fire danger. Vegetation would be removed using mechanical equipment, such as chainsaws, weed trimmers, rakes, shovels, and brush hooks. A crew of three workers would typically conduct this work. A 100-foot-diameter area around each transmission structure would be required. Poles are typically inspected on an annual basis to determine if vegetation removal around poles is required.

*Application of Herbicides.* To prevent vegetation from reoccurring around structures, Soitec may use herbicides in accordance with SDG&E's Herbicides and Application Procedures. The utility SDG&E normally utilizes one or more of 16 herbicides. These herbicides are identified in a U.S. Fish and Wildlife Service (USFWS) letter to SDG&E, along with their recommendations. The application of herbicides generally requires one person and takes only minutes to spray around the base of the pole within a radius of approximately 10 feet. The employee would either walk from the nearest access road to apply the herbicide or drive a pick-up truck directly to each pole location as access permits.

*Equipment Repair and Replacement.* Poles or structures support a variety of equipment, such as conductors, insulators, switches, transformers, lightning arrest devices, line junctions, and other electrical equipment. In order to maintain uniform, adequate, safe, and reliable service, electrical equipment may need to be added, repaired, or replaced during operations. An existing transmission structure may be removed and replaced with a larger/stronger structure at the same location or a nearby location, due to damage or changes in conductor size. Equipment repair or replacement generally requires a crew to gain access to the location of the equipment to be repaired or replaced. The crew normally consists of four people with two to three trucks, a boom or line truck, an aerial-lift truck, and an assist truck. If no vehicle access exists, the crew and material are flown in by helicopter.

*Insulator Washing.* The 138 kV transmission line would use polymer insulators that do not require washing.

*Use of Helicopters.* Each electric transmission line is inspected several times a year via helicopter. Helicopters may also be used to deliver equipment, position poles and structures, string lines, and position aerial markers, as required by Federal Aviation Administration regulations.

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## 4.2 Construction GHG Emissions

GHG emissions would be associated with the construction phase of the proposed project (solar farm and gen-tie line) through use of construction equipment and vehicle trips. Emissions of CO<sub>2</sub> from off-road equipment used the construction phase of the project were estimated using emission rates derived using CARB’s offroad equipment model, OFFROAD2007, available online (<http://www.arb.ca.gov/msei/offroad/offroad.htm>). Emissions of all pollutants from on-road trucks and passenger vehicles were estimated using emission factors derived using CARB’s motor vehicle emission inventory program, EMFAC2011, available online (<http://www.arb.ca.gov/msei/modeling.htm>).

Vehicle miles traveled (VMT) for paved road travel by workers are based on a 35-mile commute distance from Alpine, El Centro, and surrounding areas<sup>5</sup>, and equipment delivery truck VMT are based on 85-mile one-way routes from Rancho Bernardo where equipment deliveries would originate.<sup>6</sup>

The results were adjusted to estimate CH<sub>4</sub> and N<sub>2</sub>O emissions in addition to CO<sub>2</sub>. The CO<sub>2</sub> emissions from off-road equipment and vehicles and delivery trucks, which are assumed to be diesel fueled, were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for diesel fuel as reported in the California Climate Action Registry’s (CCAR) General Reporting Protocol for transportation fuels and the global warming potential for each GHG (CCAR 2009). The CO<sub>2</sub> emissions associated with construction worker trips were multiplied by a factor based on the assumption that CO<sub>2</sub> represents 95% of the CO<sub>2</sub>E emissions associated with passenger vehicles (EPA 2005). The results were then converted from annual tons per year to metric tons per year. Table 4, Estimated Construction GHG Emissions, shows the estimated annual GHG construction emissions associated with the proposed project, as well as the 30-year amortized construction emissions.

**Table 4**  
**Estimated Construction GHG Emissions (metric tons/year)**

Construction Year	CO <sub>2</sub> E Emissions
2014	2,783.86
2015	626.98
30-year amortized emissions	113.69

Source: OFFROAD2007, EMFAC 2011. See Appendix A for complete results.

<sup>5</sup> The average of the distances from Alpine and El Centro is 46 miles. This distance was reduced by 25% to reflect worker commute trips from local housing (temporary or permanent) for an average worker commute distance of 35 miles.

<sup>6</sup> VMT = one-way miles × 2 × number of trips

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## 4.3 Operational GHG Emissions

The following section discusses the calculations of GHG emissions resulting from the primary sources of GHGs associated with the operation of the proposed project. Operation of the project would produce GHG emissions associated with worker vehicles, personnel transport vehicles, washing vehicles (heavy-duty diesel water trucks), satellite washing vehicles (light-duty diesel trucks), service trucks, emergency generators, electricity consumption, and water supply during operation and maintenance for the solar project. Operation of the gen-tie would include pole/structure brushing, herbicide application, equipment repair using heavy-duty diesel trucks and light-duty diesel trucks, and biannual helicopter inspections. GHG emissions from natural gas use and creation of solid waste are not associated with the proposed project. At the present time, specific substation devices, such as transformers and circuit breakers, have not been identified; however, the substation is not expected to include any equipment that uses SF<sub>6</sub>, which is a GHG associated with high-voltage switching devices at some substations. Should substation devices contain SF<sub>6</sub>, SDG&E has implemented maintenance and repair practices that have resulted in a system-wide average leakage rate of 0.29%, which would minimize SF<sub>6</sub> emissions. It is anticipated that the project proponent would employ similar practices.

### 4.3.1 Motor Vehicles

The proposed project would impact air quality through the vehicular traffic generated by operations and maintenance vehicles including worker vehicles, on-site personnel transport vehicles, washing vehicles and a service truck. Worker trip distances for operation and maintenance of the solar farm were conservatively estimated for the model inputs as originating in Alpine, El Centro, and surrounding areas (approximately 35 miles one-way as discussed in Section 4.2). All other operation and maintenance vehicles were assumed to be staged at a location near the project site, resulting in an estimated 10 miles per day of maintenance activities per vehicle. Maintenance vehicles associated with the gen-tie line were assumed to originate in Alpine plus the length of the gen-tie line (6 miles) for a total of 41 miles one-way. Maintenance activities for the gen-tie line were assumed to occur twice a month, and periodic repair activities were assumed to occur one week (5 days) per year.

Annual CO<sub>2</sub> emissions from motor vehicle trips associated with the proposed project were quantified using EMFAC2011. The CO<sub>2</sub> emissions from diesel-fueled washing vehicles were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for diesel fuel as reported in the CCAR's General Reporting Protocol for transportation fuels and the global warming potential for each GHG (CCAR 2009). CH<sub>4</sub> and N<sub>2</sub>O emissions from all other motor vehicles during operation of the project were accounted for by multiplying the estimated CO<sub>2</sub> emissions by a factor based on the assumption that CO<sub>2</sub> represents 95% of the CO<sub>2</sub>E emissions associated with passenger vehicles (EPA 2005). As summarized in Table 5, Estimated Operational GHG

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Emissions, total annual operational GHG emissions from motor vehicles would be 111.34 metric tons CO<sub>2</sub>E per year. Additional detail regarding these calculations can be found in Appendix A.

## 4.3.2 Helicopters

Helicopters would be used for surveillance and inspection of the gen-tie line. To best represent helicopter emissions during maintenance and inspection activities, a Bell 206 helicopter was used for the purposes of calculating annual CO<sub>2</sub> emissions. Annual CO<sub>2</sub> emissions from helicopter use were calculated based on fuel consumption of a Bell 206 model aircraft and the CO<sub>2</sub> emission factor for aviation gasoline as reported in the CCAR's *General Reporting Protocol* for transportation fuels (CCAR 2009). The GHG emissions estimate is based on two inspections of the gen-tie line, each lasting approximately 8 hours. The CO<sub>2</sub> emissions from use of helicopters were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for aviation gasoline as reported in the CCAR's *General Reporting Protocol* for transportation fuels and the global warming potential for each GHG (CCAR 2009).

## 4.3.3 Diesel Generators

Operational emissions would result from intermittent use of two 680 kW diesel-powered emergency generators for maintenance and testing purposes. Each generator would be run for testing and maintenance approximately one hour each week for a total of 50 hours per year. Generator engines would meet the EPA standards for Tier 2 engines as required by the CARB Airborne Toxic Control Measure for new and in-use stationary diesel engines. The CO<sub>2</sub> emission factor was obtained from Section 3.4 (Large Stationary Diesel and All Stationary Dual-fuel Engines) of the EPA's *Compilation of Air Pollutant Emission Factors* (EPA 1996). The CO<sub>2</sub> emissions from diesel combustion were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for natural gas as reported in the CCAR's *General Reporting Protocol* (CCAR 2009) for stationary combustion fuels and their GWPs. The estimated emissions from the emergency generator engines are shown in Table 5. Refer to Appendix A for additional information.

## 4.3.4 Electrical Generation

Annual electricity use for the proposed O&M annex was based upon estimated generation rates for land uses in the SDG&E service area (see Appendix A). In addition, the trackers (e.g., control units, motors) and other devices (e.g., inverters, field communications) common to each building block of trackers would use electricity to be provided by SDG&E (see Appendix A). The project proponent provided the estimated ratings of the devices and their operating schedule. Annual usage was determined depending on the period that devices would operate (e.g., daylight hours only). The generation of electricity through combustion of fossil fuels typically results in emissions of

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CO<sub>2</sub> and to a smaller extent CH<sub>4</sub> and N<sub>2</sub>O. Annual electricity emissions were estimated using the reported CO<sub>2</sub> emissions per kilowatt-hour for SDG&E (SDG&E 2010), which would provide electricity for the project, adjusted to reflect 33% renewable energy in 2020. The contributions of CH<sub>4</sub> and N<sub>2</sub>O for powerplants in California were obtained from the CCAR's General Reporting Protocol (CCAR 2009), which were adjusted for their GWPs. The proposed project would consume an estimated 1,095,859 kilowatt-hours per year, generating approximately 275.04 metric tons CO<sub>2</sub>E annually as shown in Table 5 (see Appendix A for complete results).

### **4.3.5 Water Supply and Wastewater**

Water supplied to the proposed project would be obtained from an on-site well, which would require the use of electricity. Annual water use for the proposed project for the O&M annex and washing the CPV trackers was based upon information provided by the project proponent and would result in a water consumption rate of approximately 3.68 acre-feet per year. The estimated electrical usage associated with water supply was obtained from a CEC report on electricity associated with water supply in California (CEC 2006). An electricity usage factor representing supply and conveyance of locally supplied water in Northern California was assumed to be applicable (the factor for Southern California water assumes that water would be provided from the State Water Project, which is not the case for this project). GHG emissions from electrical generation were calculated as described in Section 4.3.3. As shown in Table 5, annual water use would result in approximately 1.96 metric tons CO<sub>2</sub>E per year (see Appendix A).

GHG emissions associated with wastewater treatment using a septic tank were estimated based on data provided in the *County of San Diego Design Manual for Onsite Wastewater Treatment Systems* (County of San Diego 2010b) and a CH<sub>4</sub> emission factor derived from *CalEEMod User's Guide* (Environ 2011). Estimated annual wastewater treatment would result in approximately 0.09 metric tons CO<sub>2</sub>E per year (see Appendix A).

### **4.3.6 Summary of GHG Emissions**

As shown in Table 5, total annual GHG emissions from construction and operation of the proposed project would be approximately 556.63 metric tons CO<sub>2</sub>E per year.

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**Table 5**  
**Estimated Operational GHG Emissions (metric tons/year)**

Source	CO <sub>2</sub> E Emissions
Motor Vehicles	111.34
Helicopters	3.53
Emergency Generators	50.97
Electrical Generation	275.04
Water Supply	1.96
Wastewater	0.09
30-year amortized construction emissions	113.69
<b>Total</b>	<b>556.63</b>

Source: EMFAC2011; CCAR 2009; EPA 2005; CEC 2006 . See Appendix A for complete results.

Because the total project GHG emissions would not exceed the County’s screening threshold of 900 metric tons CO<sub>2</sub>E, the impact would be less than significant.

## 4.4 Project Design Features and Mitigation Measures

No mitigation measures would be required.

## 4.5 GHG Emission Benefits

In keeping with the renewable energy target under the Scoping Plan and as required by SB X1 2, the proposed project would provide a source of renewable energy to achieve the Renewable Portfolio Standard of 33% by 2020. Renewable energy, in turn, potentially offsets GHG emissions generated by fossil-fuel power plants. Based on estimates by the project proponent, the project would generate 2,083 kilowatt-hours alternating current annually per installed kilowatt (based on the direct current capacity of the CPV trackers). This factor reflects the available daylight hours, conversion of direct current to alternating current, and various system losses. Using the installed CPV capacity of 80 MW (80,000 kW) direct current, the project is anticipated to generate 166,640,000 kW per year. A GHG factor for fossil-fuel-generated electricity was developed based on reported CO<sub>2</sub> emissions per kilowatt-hour for SDG&E in 2008 (SDG&E 2010) and an adjustment to reflect electricity from renewable energy, large hydroelectric, and nuclear sources in 2009 (SDG&E n.d.), which do not generate GHG emissions. The CO<sub>2</sub> factor for fossil-fuel-generated electricity would be 1.071 pounds CO<sub>2</sub> per kilowatt-hour. The contributions of CH<sub>4</sub> and N<sub>2</sub>O for powerplants in California were obtained from the CCAR’s *General Reporting Protocol* (CCAR 2009), which were adjusted for their GWPs. Thus, the proposed project would provide a potential reduction of 81,334 metric tons CO<sub>2</sub>E per year if the electricity generated by the proposed project were to be used instead of electricity generated by fossil-fuel sources.

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Additional detail regarding these calculations can be found in Appendix A. After accounting for the amortized construction and annual operational emissions of 557 metric tons CO<sub>2</sub>E per year, the net reduction in GHG emissions would be 80,777 metric tons CO<sub>2</sub>E per year. This reduction is not considered in the significance determination of the proposed project's GHG emissions but is provided for disclosure purposes.

### **4.6 Conclusion**

The proposed project's potential effect on global climate change was evaluated, and GHG emissions were estimated. The project is estimated to result in construction and operational GHG emissions of approximately 557 metric tons CO<sub>2</sub>E. As such, the proposed project would not exceed the 900-metric-ton threshold as described in the *DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan*, and it is therefore not likely to impede the implementation of AB 32. The project would therefore have a less-than-significant impact on climate change.

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## 5.0 REFERENCES

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## 6.0 LIST OF PREPARERS

David Deckman	Director of Air Quality Services
Jennifer Longabaugh	Environmental Planner
Hannah Westwood	Publications Services

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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APPENDIX A  
*Greenhouse Gas Emission Calculations*

**Tierra del Sol Solar Farm  
Emissions Summary**

**CO2**

Activity	2014 Emissions (tons/yr)	2015 Emissions (tons/yr)
<b>Offroad Emissions</b>		
Site Demolition/Clearing/Grubbing/Grinding/Road	339.26	—
Underground Electric/Communications Cable Installation	40.28	—
Tracker Installation Phase I (45 MW)	616.00	—
Tracker Installation Phase II (15 MW)	—	205.33
Substation Construction	114.48	—
O&M Building Construction	57.35	—
Equipment/Other Materials Delivery	—	—
Gen-Tie Line Construction	134.71	—
<b>OFFROAD ANNUAL TOTAL</b>	<b>1302.08</b>	205.33
<b>Onroad Emissions</b>	<b>1732.90</b>	<b>473.87</b>
<b>ANNUAL EMISSIONS</b>	<b>3,034.98</b>	<b>679.20</b>

**Tierra del Sol Solar Farm Project  
Off Road Equipment Emissions**

**2014 EMISSIONS**

Equipment	# of Units	Hrs/Day	Duration (Days)	Category	2014 Emissions (lb/day)	2014 Emissions (tons/year)
					CO2	CO2
<b>Site Demolition/Clearing/Grubbing/Grinding/Road Construction</b>						
Graders	1	8	60	Off-Road	1061.05	31.83
Crawler Tractors	2	8	60	Off-Road	1822.00	54.66
Scrapers	4	8	60	Off-Road	8425.49	252.76
<b>PHASE SUBTOTAL</b>					<b>11308.54</b>	<b>339.26</b>
<b>Underground Electric/Communications Cable Installation</b>						
Tractor/Loader/Backhoes	2	6	100	Off-Road	805.55	40.28
<b>PHASE SUBTOTAL</b>					<b>805.55</b>	<b>40.28</b>
<b>Tracker Installation (Phase I - 45MW)</b>						
Skid Steer Loader	1	6	120	Off-Road	181.50	10.89
Bore/Drill Rigs	4	8	120	Off-Road	5173.12	310.39
Cranes	1	8	120	Off-Road	999.10	59.95
Module Suction Lifters	6	8	120	Off-Road	2608.65	156.52
Tracker Lift Beam	3	8	120	Off-Road	1304.33	78.26
<b>PHASE SUBTOTAL</b>					<b>10266.69</b>	<b>616.00</b>
<b>Substation Construction</b>						
Cranes	1	8	100	Off-Road	999.10	49.95
Aerial Lifts	1	4	100	Off-Road	138.76	6.94
Excavators	1	6	100	Off-Road	717.01	35.85
Forklifts	1	8	100	Off-Road	434.78	21.74
<b>PHASE SUBTOTAL</b>					<b>2,289.64</b>	<b>114.48</b>
<b>O&amp;M Building Construction</b>						
Cranes	1	8	80	Off-Road	999.10	39.96
Forklifts	1	8	80	Off-Road	434.78	17.39
<b>PHASE SUBTOTAL</b>					<b>1433.87</b>	<b>57.35</b>
<b>Gen-Tie Line Construction</b>						
<b>Access Road Construction</b>						
Crawler Tractors	4	8	12	Off-Road	3644.00	21.86
Excavators	3	8	12	Off-Road	2868.03	17.21
Graders	1	8	12	Off-Road	1061.05	6.37
Rollers	1	8	12	Off-Road	535.93	3.22
<b>PHASE SUBTOTAL</b>					<b>8,109.00</b>	<b>48.65</b>
<b>Pole Installation</b>						
Bore/Drill Rigs <sup>2</sup>	2	8	48	Off-Road	2586.56	62.08
Cranes	1	8	48	Off-Road	999.10	23.98
<b>PHASE SUBTOTAL</b>					<b>3,585.66</b>	<b>86.06</b>
<b>Gen-Tie Line Phase Total</b>					<b>11,694.66</b>	<b>134.71</b>
<b>2014 TOTALS</b>						<b>1302.08</b>

## 2015 EMISSIONS

Equipment	# of Units	Hrs/Day	Duration (Days)	Category	2015 Emissions (lb/day)	2015 Emissions (tons/year)
					CO2	CO2
<b>Tracker Installation (Phase II - 15MW)</b>						
Skid Steer Loader	1	6	40	Off-Road	181.50	3.63
Bore/Drill Rigs	4	8	40	Off-Road	5173.00	103.46
Cranes	1	8	40	Off-Road	999.10	19.98
Module Suction Lifters	6	8	40	Off-Road	2608.66	52.17
Tracker Lift Beam	3	8	40	Off-Road	1304.33	26.09
<b>PHASE SUBTOTAL</b>					<b>10266.58</b>	<b>205.33</b>
<b>2015 TOTALS</b>						<b>205.33</b>

Source (Equipment Specs): Soitec. 2012 Tierra del Sol Solar Farm - Construction Schedule and Equipment. January 2013.

1. Assumed module suction lifter and tracker lift beam would generate comparable emissions to forklift
2. Assumed bore/drill rig would generate comparable emissions to truck-mounted auger used during pole installation

**Tierra del Sol Solar Farm Project  
Off-Road Equipment Emission Rates**

Equipment	Category	2014 Emission Rates (lb/hr)		2015 Emission Rates (lb/hr)	
		CO2		CO2	
<b>Site Demolition/Clearing/Grubbing/Grinding/Road Construction</b>					
Graders	Off-Road	132.631		132.631	
Crawler Tractors	Off-Road	113.875		113.875	
Scrapers	Off-Road	263.297		263.297	
<b>Underground Electric/Communications Cable Installation</b>					
Tractor/Loader/Backhoes	Off-Road	67.129		67.129	
<b>Tracker Installation (Phase I - 45MW)</b>					
Skid Steer Loaders	Off-Road	30.249		30.250	
Bore/Drill Rigs	Off-Road	161.660		161.656	
Cranes	Off-Road	124.887		124.887	
Module Suction Lifters <sup>1</sup>	Off-Road	54.347		54.347	
Tracker Lift Beam <sup>1</sup>	Off-Road	54.347		54.347	
<b>Tracker Installation (Phase II - 15MW)</b>					
Skid Steer Loaders	Off-Road	30.249		30.250	
Bore/Drill Rigs	Off-Road	161.660		161.656	
Cranes	Off-Road	124.887		124.887	
Module Suction Lifters <sup>1</sup>	Off-Road	54.347		54.347	
Tracker Lift Beam <sup>1</sup>	Off-Road	54.347		54.347	
<b>Substation Construction</b>					
Cranes	Off-Road	124.887		124.887	
Aerial Lifts	Off-Road	34.691		34.691	
Excavators	Off-Road	119.501		119.501	
Forklifts	Off-Road	54.347		54.347	
<b>O&amp;M Building Construction</b>					
Cranes	Off-Road	124.887		124.887	
Forklifts	Off-Road	54.347		54.347	
<b>Gen-Tie Line Construction</b>					
Crawler Tractors	Off-Road	113.875		113.875	
Excavators	Off-Road	119.501		119.501	
Graders	Off-Road	132.631		132.631	
Rollers	Off-Road	66.991		66.988	
Bore/Drill Rigs	Off-Road	161.660		161.656	
Cranes	Off-Road	124.887		124.887	

Source (Emission Factors): OFFROAD2007 -CO2.

1. Forklift emission factors were utilized as representative factors for module suction lifters and tracker lift beams

**Tierra del Sol Solar Farm Project  
On Road Equipment Emissions**

**2014 EMISSIONS**

Vehicle Type	Trips/Day	No. of Units	Distance (mi)	Duration (days)	Category	2014 Emissions (lb/day)	2014 Emissions (lbs/month)
						CO2	CO2
<b>April</b>							
<i>Gen-Tie Line</i>							
Worker Vehicles <sup>1</sup>	8	4	35.0	12	On-Road	250.26	3,003.07
Delivery Trucks <sup>2</sup>	8		67.0	12	On-Road	2,156.10	25,873.23
Water Trucks <sup>3</sup>		1	30.0	12	On-Road	120.68	1,448.13
Concrete Trucks <sup>4</sup>	16		7.0	12	On-Road	450.53	5,406.35
<b>May</b>							
<i>Gen-Tie Line</i>							
Worker Vehicles <sup>1</sup>	8	4	35.0	26	On-Road	250.26	6,506.64
Delivery Trucks <sup>2</sup>	8		67.0	26	On-Road	2,156.10	56,058.67
Water Trucks <sup>3</sup>		1	30.0	26	On-Road	120.68	3,137.61
Concrete Trucks <sup>4</sup>	16		7.0	26	On-Road	450.53	11,713.75
<b>June</b>							
<i>Gen-Tie Line</i>							
Worker Vehicles <sup>1</sup>	30	15	35.0	26	On-Road	938.46	24,399.91
Bucket Trucks <sup>5</sup>		8	20.0	26	On-Road	643.61	16,733.93
Pull Site Tensioners <sup>6</sup>		3	20.0	26	On-Road	241.35	6,275.22
Water Trucks <sup>3</sup>		1	30.0	26	On-Road	120.68	3,137.61
<b>July</b>							
Worker Vehicles <sup>1</sup>	18		35.0	26	On-Road	563.07	14,639.94
Delivery Trucks <sup>7</sup>	8		85.0	26	On-Road	2,735.35	71,119.21
Water Trucks (On-Site) <sup>8</sup>		2	120.0	26	On-Road	965.42	25,100.90
Water Trucks (Off-Site) <sup>9</sup>	118		11.0	26	On-Road	5,221.31	135,754.01
Dump Trucks <sup>10</sup>		4	60.0	26	On-Road	965.42	25,100.90
<b>August</b>							
Worker Vehicles <sup>1</sup>	180		35.0	26	On-Road	5,630.75	146,399.44
Delivery Trucks <sup>7</sup>	40		85.0	26	On-Road	13,676.77	355,596.03
Water Trucks (On-Site) <sup>8</sup>		2	120.0	26	On-Road	965.42	25,100.90
Water Trucks (Off-Site) <sup>9</sup>	118		11.0	26	On-Road	5,221.31	135,754.01
Concrete Trucks <sup>4</sup>	10		7.0	26	On-Road	281.58	7,321.09
Commissioning Trips <sup>11</sup>	8		35.0	26	On-Road	250.26	6,506.64
<b>September</b>							
Worker Vehicles <sup>1</sup>	180		35.0	26	On-Road	5,630.75	146,399.44
Delivery Trucks <sup>7</sup>	48		85.0	26	On-Road	16,412.12	426,715.23
Water Trucks (On-Site) <sup>8</sup>		2	120.0	26	On-Road	965.42	25,100.90
Water Trucks (Off-Site) <sup>9</sup>	118		11.0	10	On-Road	5,221.31	52,213.08
Dump Trucks <sup>10</sup>		4	60.0	26	On-Road	965.42	25,100.90
Commissioning Trips <sup>11</sup>	8		35.0	26	On-Road	250.26	6,506.64
Concrete Trucks <sup>4</sup>	10		7.0	26	On-Road	281.58	7,321.09

**Tierra del Sol Solar Farm Project  
On Road Equipment Emissions**

<b>October</b>							
Worker Vehicles <sup>1</sup>	180		35.0	26	On-Road	5,630.75	146,399.44
Delivery Trucks <sup>7</sup>	48		85.0	26	On-Road	16,412.12	426,715.23
Commissioning Trips <sup>11</sup>	8		35.0	26	On-Road	250.26	6,506.64
Water Trucks (On-Site) <sup>8</sup>		1	60.0	26	On-Road	241.35	6,275.22
Dump Trucks <sup>10</sup>		4	60.0	26	On-Road	965.42	25,100.90
Concrete Trucks <sup>4</sup>	10		7.0	26	On-Road	281.58	7,321.09
<b>November</b>							
Worker Vehicles <sup>1</sup>	180		35.0	26	On-Road	5,630.75	146,399.44
Delivery Trucks <sup>7</sup>	48		85.0	26	On-Road	16,412.12	426,715.23
Commissioning Trips <sup>11</sup>	8		35.0	26	On-Road	250.26	6,506.64
Water Trucks (On-Site) <sup>8</sup>		1	60.0	26	On-Road	241.35	6,275.22
Dump Trucks <sup>10</sup>		4	60.0	26	On-Road	965.42	25,100.90
Concrete Trucks <sup>4</sup>	10		7.0	26	On-Road	281.58	7,321.09
<b>December</b>							
Worker Vehicles <sup>1</sup>	136		35.0	26	On-Road	4,254.34	110,612.91
Delivery Trucks <sup>7</sup>	30		85.0	26	On-Road	10,257.58	266,697.02
Commissioning Trips <sup>11</sup>	4		35.0	26	On-Road	563.16	14,642.19
Water Trucks (On-Site) <sup>8</sup>		1	60.0	26	On-Road	241.35	6,275.22
Dump Trucks <sup>10</sup>		4	60.0	26	On-Road	965.42	25,100.90
Concrete Trucks <sup>4</sup>	6		7.0	26	On-Road	168.95	4,392.66
						<b>TOTAL 2014</b>	<b>3465802.40</b>

**Tierra del Sol Solar Farm Project  
On Road Equipment Emissions**

**2015 EMISSIONS**

Vehicle Type	Trips/Day	No. of Units	Distance (mi)	Duration (days)	Category	2015 Emissions (lb/day)	2015 Emissions (lbs/month)
						CO2	CO2
<b>January</b>							
Worker Vehicles <sup>1</sup>	34		35.0	26	On-Road	1,063.47	27,650.24
Delivery Trucks <sup>7</sup>	4		85.0	26	On-Road	1,366.57	35,530.71
Water Trucks (On-Site) <sup>8</sup>		1	60.0	26	On-Road	241.16	6,270.12
<b>February</b>							
Worker Vehicles <sup>1</sup>	136		35.0	26	On-Road	4,253.88	110,600.96
Delivery Trucks <sup>7</sup>	18		85.0	26	On-Road	6,149.55	159,888.19
Concrete Trucks <sup>4</sup>	6		7.0	26	On-Road	168.95	4,392.66
Commissioning Trips <sup>11</sup>	4		35.0	26	On-Road	125.11	3,252.97
Water Trucks (On-Site) <sup>8</sup>		1	60.0	26	On-Road	241.16	6,270.12
<b>March</b>							
Worker Vehicles <sup>1</sup>	136		35.0	26	On-Road	4,253.88	110,600.96
Delivery Trucks <sup>7</sup>	18		85.0	26	On-Road	6,149.55	159,888.19
Concrete Trucks <sup>4</sup>	6		7.0	26	On-Road	168.95	4,392.66
Commissioning Trips <sup>11</sup>	4		35.0	26	On-Road	125.11	3,252.97
Water Trucks (On-Site) <sup>8</sup>		1	60.0	26	On-Road	241.16	6,270.12
<b>April</b>							
Worker Vehicles <sup>1</sup>	136		35.0	26	On-Road	4,253.88	110,600.96
Delivery Trucks <sup>7</sup>	18		85.0	26	On-Road	6,149.55	159,888.19
Concrete Trucks <sup>4</sup>	6		7.0	26	On-Road	168.95	4,392.66
Commissioning Trips <sup>11</sup>	4		35.0	26	On-Road	125.11	3,252.97
Dump Trucks <sup>10</sup>		4	60.0	26	On-Road	964.63	25,080.50
Water Trucks (On-Site) <sup>8</sup>		1	60.0	26	On-Road	241.16	6,270.12
<b>TOTAL 2015</b>							<b>947,746.27</b>

1. Trips per day - assumes 85% of total worker trips due to carpooling

Employee commute distance of 35 miles is assumed based on local workforce from Alpine and Boulevard

2. Gen-tie materials delivery coming from San Diego

3. Assumes water trucks during gen-tie construction will be operating at 15 mph for 2 hours per day = 30 mi/day

4. Assumes concrete trucks will be coming from Rugged solar site where concrete batch plant is located (approximately 7 miles)

5. Assumes bucket trucks will be operating intermittently at 10 mph for an equivalent of 2 hours per day = 20 mi/day

6. Assumes tensioners will be operating intermittently at 10 mph for an equivalent of 2 hours per day = 20 mi/day

7. Materials delivery coming from Rancho Bernardo, San Diego

8. Assumes on-site water trucks will be operating at 15 mph for 8 hours per day during site preparation (120 mi/day), and 4 hours per day following site preparation activities (60 mi/day)

9. Assumes 444,476 gallons/day of water is imported from Jacumba Community Services District (approx. 11 miles) during August, September, and October for site preparation and road construction

10. Assumes dump trucks will be operating at 15 mph for 4 hours per day = 60 mi/day

11. Employee commute distance of 35 miles is assumed based on local workforce from Alpine and Boulevard

Water for grub/grind/grading 444,476 gal//day

Source: AECOM Water Estimation Sheet

**Tierra del Sol Solar Farm Project  
EMFAC2011 Modeling Results and Emission Factor Calculations**

**LDA**

CALYR	VMT/1000	Fuel	POLLUTANT	PROCESS	EMISSIONS	BASIS
2013	43117	GAS	ROG	Total	11.423	Day
2013	186	DSL	ROG	Total	0.011	Day
2013	43117	GAS	NOx	Total Ex	9.855	Day
2013	186	DSL	NOx	Total Ex	0.144	Day
2013	43117	GAS	CO	Total Ex	108.227	Day
2013	186	DSL	CO	Total Ex	0.057	Day
2013	43117	GAS	SOx	Total Ex	0.176	Day
2013	186	DSL	SOx	Total Ex	0.001	Day
2013	43117	GAS	PM10	Total	2.257	Day
2013	186	DSL	PM10	Total	0.017	Day
2013	43117	GAS	PM2.5	Total	0.962	Day
2013	186	DSL	PM2.5	Total	0.011	Day
2013	43117	GAS	CO2	Total Ex	17435.790	Day
2013	186	DSL	CO2	Total Ex	76.436	Day
<b>2014</b>						
2014	43614	GAS	ROG	Total	10.173	Day
2014	190	DSL	ROG	Total	0.009	Day
2014	43614	GAS	NOx	Total Ex	8.915	Day
2014	190	DSL	NOx	Total Ex	0.133	Day
2014	43614	GAS	CO	Total Ex	97.134	Day
2014	190	DSL	CO	Total Ex	0.051	Day
2014	43614	GAS	SOx	Total Ex	0.178	Day
2014	190	DSL	SOx	Total Ex	0.001	Day
2014	43614	GAS	PM10	Total	2.271	Day
2014	190	DSL	PM10	Total	0.016	Day
2014	43614	GAS	PM2.5	Total	0.962	Day
2014	190	DSL	PM2.5	Total	0.010	Day
2014	43614	GAS	CO2	Total Ex	17646.734	Day
2014	190	DSL	CO2	Total Ex	78.503	Day
<b>2015</b>						
2015	44100	GAS	ROG	Total	9.172	Day
2015	194	DSL	ROG	Total	0.008	Day
2015	44100	GAS	NOx	Total Ex	8.145	Day
2015	194	DSL	NOx	Total Ex	0.123	Day
2015	44100	GAS	CO	Total Ex	87.928	Day
2015	194	DSL	CO	Total Ex	0.046	Day
2015	44100	GAS	SOx	Total Ex	0.180	Day
2015	194	DSL	SOx	Total Ex	0.001	Day
2015	44100	GAS	PM10	Total	2.287	Day
2015	194	DSL	PM10	Total	0.015	Day
2015	44100	GAS	PM2.5	Total	0.966	Day
2015	194	DSL	PM2.5	Total	0.009	Day
2015	44100	GAS	CO2	Total Ex	17836.977	Day
2015	194	DSL	CO2	Total Ex	80.267	Day

**Tierra del Sol Solar Farm Project  
EMFAC2011 Modeling Results and Emission Factor Calculations**

**LDT1**

CALYR	VMT/1000	VEH TECH	POLLUTANT	PROCESS	EMISSIONS	BASIS
2013	6258	GAS	ROG	Total	3.295	Day
2013	7	DSL	ROG	Total	0.001	Day
2013	6258	GAS	NOx	Total Ex	2.706	Day
2013	7	DSL	NOx	Total Ex	0.006	Day
2013	6258	GAS	CO	Total Ex	29.394	Day
2013	7	DSL	CO	Total Ex	0.003	Day
2013	6258	GAS	SOx	Total Ex	0.030	Day
2013	7	DSL	SOx	Total Ex	0.000	Day
2013	6258	GAS	PM10	Total	0.346	Day
2013	7	DSL	PM10	Total	0.001	Day
2013	6258	GAS	PM2.5	Total	0.156	Day
2013	7	DSL	PM2.5	Total	0.001	Day
2013	6258	GAS	CO2	Total Ex	2915.62	Day
2013	7	DSL	CO2	Total Ex	2.75	Day
<b>2014</b>						
2014	6327	GAS	ROG	Total	3.052	Day
2014	7	DSL	ROG	Total	0.001	Day
2014	6327	GAS	NOx	Total Ex	2.478	Day
2014	7	DSL	NOx	Total Ex	0.006	Day
2014	6327	GAS	CO	Total Ex	26.716	Day
2014	7	DSL	CO	Total Ex	0.003	Day
2014	6327	GAS	SOx	Total Ex	0.030	Day
2014	7	DSL	SOx	Total Ex	0.000	Day
2014	6327	GAS	PM10	Total	0.346	Day
2014	7	DSL	PM10	Total	0.001	Day
2014	6327	GAS	PM2.5	Total	0.155	Day
2014	7	DSL	PM2.5	Total	0.001	Day
2014	6327	GAS	CO2	Total Ex	2951.180	Day
2014	7	DSL	CO2	Total Ex	2.890	Day
<b>2015</b>						
2015	6386	GAS	ROG	Total	2.849	Day
2015	7	DSL	ROG	Total	0.001	Day
2015	6386	GAS	NOx	Total Ex	2.276	Day
2015	7	DSL	NOx	Total Ex	0.005	Day
2015	6386	GAS	CO	Total Ex	24.337	Day
2015	7	DSL	CO	Total Ex	0.002	Day
2015	6386	GAS	SOx	Total Ex	0.030	Day
2015	7	DSL	SOx	Total Ex	0.000	Day
2015	6386	GAS	PM10	Total	0.347	Day
2015	7	DSL	PM10	Total	0.001	Day
2015	6386	GAS	PM2.5	Total	0.154	Day
2015	7	DSL	PM2.5	Total	0.001	Day
2015	6386	GAS	CO2	Total Ex	2981.868	Day
2015	7	DSL	CO2	Total Ex	3.010	Day

**Tierra del Sol Solar Farm Project  
EMFAC2011 Modeling Results and Emission Factor Calculations**

**LDT2**

CALYR	VMT/1000	VEH TECH	POLLUTANT	PROCESS	EMISSIONS	BASIS
2013	16353	GAS	ROG	Total	4.429	Day
2013	7	DSL	ROG	Total	0.000	Day
2013	16353	GAS	NOx	Total Ex	5.697	Day
2013	7	DSL	NOx	Total Ex	0.006	Day
2013	16353	GAS	CO	Total Ex	46.750	Day
2013	7	DSL	CO	Total Ex	0.003	Day
2013	16353	GAS	SOx	Total Ex	0.091	Day
2013	7	DSL	SOx	Total Ex	0.000	Day
2013	16353	GAS	PM10	Total	0.852	Day
2013	7	DSL	PM10	Total	0.001	Day
2013	16353	GAS	PM2.5	Total	0.362	Day
2013	7	DSL	PM2.5	Total	0.001	Day
2013	16353	GAS	CO2	Total Ex	9017.60	Day
2013	7	DSL	CO2	Total Ex	2.76	Day
<b>2014</b>						
2014	16522	GAS	ROG	Total	4.125	Day
2014	7	DSL	ROG	Total	0.000	Day
2014	16522	GAS	NOx	Total Ex	5.104	Day
2014	7	DSL	NOx	Total Ex	0.006	Day
2014	16522	GAS	CO	Total Ex	42.486	Day
2014	7	DSL	CO	Total Ex	0.002	Day
2014	16522	GAS	SOx	Total Ex	0.092	Day
2014	7	DSL	SOx	Total Ex	0.000	Day
2014	16522	GAS	PM10	Total	0.858	Day
2014	7	DSL	PM10	Total	0.001	Day
2014	16522	GAS	PM2.5	Total	0.363	Day
2014	7	DSL	PM2.5	Total	0.000	Day
2014	16522	GAS	CO2	Total Ex	9110.407	Day
2014	7	DSL	CO2	Total Ex	2.967	Day
<b>2015</b>						
2015	16700	GAS	ROG	Total	3.851	Day
2015	7	DSL	ROG	Total	0.000	Day
2015	16700	GAS	NOx	Total Ex	4.568	Day
2015	7	DSL	NOx	Total Ex	0.005	Day
2015	16700	GAS	CO	Total Ex	38.554	Day
2015	7	DSL	CO	Total Ex	0.002	Day
2015	16700	GAS	SOx	Total Ex	0.093	Day
2015	7	DSL	SOx	Total Ex	0.000	Day
2015	16700	GAS	PM10	Total	0.865	Day
2015	7	DSL	PM10	Total	0.001	Day
2015	16700	GAS	PM2.5	Total	0.365	Day
2015	7	DSL	PM2.5	Total	0.000	Day
2015	16700	GAS	CO2	Total Ex	9209.495	Day
2015	7	DSL	CO2	Total Ex	2.978	Day

**Tierra del Sol Solar Farm Project  
EMFAC2011 Modeling Results and Emission Factor Calculations**

**HHDT**

CALYR	VMT/1000	VEH TECH	POLLUTANT	PROCESS	EMISSIONS	BASIS
2013	1640	DSL	ROG	Total	0.947	Day
2013	1640	DSL	NOx	Total Ex	18.545	Day
2013	1640	DSL	CO	Total Ex	4.299	Day
2013	1640	DSL	SOx	Total Ex	0.031	Day
2013	1640	DSL	PM10	Total	0.696	Day
2013	1640	DSL	PM2.5	Total	0.544	Day
2013	1640	DSL	CO2	Total Ex	3283.86	Day
<b>2014</b>						
2014	1718	DSL	ROG	Total	0.740	Day
2014	1718	DSL	NOx	Total Ex	16.866	Day
2014	1718	DSL	CO	Total Ex	3.452	Day
2014	1718	DSL	SOx	Total Ex	0.033	Day
2014	1718	DSL	PM10	Total	0.484	Day
2014	1718	DSL	PM2.5	Total	0.344	Day
2014	1718	DSL	CO2	Total Ex	3455.453	Day
<b>2015</b>						
2015	1796	DSL	ROG	Total	0.697	Day
2015	1796	DSL	NOx	Total Ex	15.163	Day
2015	1796	DSL	CO	Total Ex	3.265	Day
2015	1796	DSL	SOx	Total Ex	0.034	Day
2015	1796	DSL	PM10	Total	0.422	Day
2015	1796	DSL	PM2.5	Total	0.283	Day
2015	1796	DSL	CO2	Total Ex	3609.401	Day

Source: EMFAC2011 online results for San Diego County

### 2013 Emission Factors

<b>Reactive Organic Gases</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker/Commissioning Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,302	6,265	16,359	65,926	1,640
ROG	tons/day	11.43	3.30	4.43	19.16	0.95
	g/mi	0.24	0.48	0.25	0.26	0.52

<b>Oxides of Nitrogen</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,302	6,265	16,359	65,926	1,640
NOx	tons/day	10.00	2.71	5.70	18.42	18.54
	g/mi	0.21	0.39	0.32	0.25	10.26

<b>Carbon Monoxide</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,302	6,265	16,359	65,926	1,640
CO	tons/day	108.28	29.40	46.75	184.43	4.30
	g/mi	2.27	4.26	2.59	2.54	2.38

<b>Sulfur Oxides</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,302	6,265	16,359	65,926	1,640
SOx	tons/day	0.18	0.03	0.09	0.30	0.03
	g/mi	0.00	0.00	0.01	0.00	0.02

<b>Particulate Matter (PM10)</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,302	6,265	16,359	65,926	1,640
PM10	tons/day	2.27	0.35	0.85	3.47	0.70
	g/mi	0.05	0.05	0.05	0.05	0.38

<b>Particulate Matter (PM2.5)</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,302	6,265	16,359	65,926	1,640
PM2.5	tons/day	0.97	0.16	0.36	1.49	0.54
	g/mi	0.02	0.02	0.02	0.02	0.30

<b>Carbon Dioxide</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,302	6,265	16,359	65,926	1,640
CO2	tons/day	17,512.23	2,918.36	9,020.36	29,450.95	3,283.86
	g/mi	366.89	422.60	500.22	405.27	1,816.26

### 2014 Emission Factors

<b>Reactive Organic Gases</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,804	6,334	16,529	66,667	1,718
ROG	tons/day	10.18	3.05	4.13	17.36	0.74
	g/mi	0.21	0.44	0.23	0.24	0.39

<b>Oxides of Nitrogen</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,804	6,334	16,529	66,667	1,718
NOx	tons/day	9.05	2.48	5.11	16.64	16.87
	g/mi	0.19	0.36	0.28	0.23	8.91

<b>Carbon Monoxide</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,804	6,334	16,529	66,667	1,718
CO	tons/day	97.19	26.72	42.49	166.39	3.45
	g/mi	2.01	3.83	2.33	2.26	1.82

<b>Sulfur Oxides</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,804	6,334	16,529	66,667	1,718
SOx	tons/day	0.18	0.03	0.09	0.30	0.03
	g/mi	0.00	0.00	0.01	0.00	0.02

<b>Particulate Matter (PM10)</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,804	6,334	16,529	66,667	1,718
PM10	tons/day	2.29	0.35	0.86	3.49	0.48
	g/mi	0.05	0.05	0.05	0.05	0.26

<b>Particulate Matter (PM2.5)</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,804	6,334	16,529	66,667	1,718
PM2.5	tons/day	0.97	0.16	0.36	1.49	0.34
	g/mi	0.02	0.02	0.02	0.02	0.18

<b>Carbon Dioxide</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	43,804	6,334	16,529	66,667	1,718
CO2	tons/day	17,725.24	2,954.07	9,113.37	29,792.68	3,455.45
	g/mi	367.10	423.10	500.18	405.41	1,824.64

### 2015 Emission Factors

<b>Reactive Organic Gases</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	44,294	6,393	16,707	67,394	1796
ROG	tons/day	9.18	2.85	3.85	15.88	0.70
	g/mi	0.19	0.40	0.21	0.21	0.35

<b>Oxides of Nitrogen</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	44,294	6,393	16,707	67,394	1796
NOx	tons/day	8.27	2.28	4.57	15.12	15.16
	g/mi	0.17	0.32	0.25	0.20	7.66

<b>Carbon Monoxide</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	44,294	6,393	16,707	67,394	1796
CO	tons/day	87.97	24.34	38.56	150.87	3.26
	g/mi	1.80	3.45	2.09	2.03	1.65

<b>Sulfur Oxides</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	44,294	6,393	16,707	67,394	1796
SOx	tons/day	0.18	0.03	0.09	0.30	0.03
	g/mi	0.00	0.00	0.01	0.00	0.02

<b>Particulate Matter (PM10)</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	44,294	6,393	16,707	67,394	1796
PM10	tons/day	2.30	0.35	0.87	3.52	0.42
	g/mi	0.05	0.05	0.05	0.05	0.21

<b>Particulate Matter (PM2.5)</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	44,294	6,393	16,707	67,394	1796
PM2.5	tons/day	0.97	0.16	0.37	1.50	0.28
	g/mi	0.02	0.02	0.02	0.02	0.14

<b>Carbon Dioxide</b>		LDA	LDT1	LDT2	LDA+LDT1+LDT2 Total	HHDT
					(Worker Trucks)	(Delivery Trucks)
VMT	1000 mi/day	44,294	6,393	16,707	67,394	1796
CO2	tons/day	17,917.24	2,984.88	9,212.47	30,114.59	3,609.40
	g/mi	366.96	423.56	500.23	405.37	1,823.16

**Tierra del Sol Solar Farm Project  
Diesel Engine-Generator Emissions**

No. of Units	2
Engine Rating	680 kW 960 HP
Operating Schedule (per unit)*	1.0 hr/day 50.0 hr/year

	CO <sub>2</sub>
gm/BHP-hr	526.18
Data Source	1
Pounds/hour	2,227
Pounds/day	2,227
Pounds/year	111,360
Metric tons/year	50.5

Notes:

\* Assumed 50 hours per year for testing and maintenance.

Sources:

1. AP-42, Section 3.4, Table 3.4-1.

## Tierra del Sol Solar Farm Project Operational Emissions<sup>1</sup>

					2015 Emissions (lbs/day) tons/year <sup>4</sup>	
					CO2	CO2
	Trips/day	# of Units	Distance (mi)	Vehicle Type		
<b>Solar Farm</b>						
Worker Vehicles <sup>2</sup>	10		35.0	LDA/LDT	625.57	82.58
Personnel Transport Vehicles <sup>3</sup>		2	10.0	LDT2	22.06	2.91
Washing Vehicles <sup>3</sup>		1	10.0	HHDT	40.19	0.72
Satellite Washing Vehicles <sup>3</sup>		2	10.0	LDT2	22.06	2.91
Service Trucks <sup>3</sup>		1	10.0	LDT2	11.03	1.46
Emergency Generators		2		N/A	2,227.20	55.68
<b>Gen-Tie Line</b>						
Pole/Structure Brushing <sup>2</sup>	6	3	41.0	LDA/LDT	439.69	5.28
Herbicide Application <sup>2</sup>	6	3	41.0	LDA/LDT	439.69	5.28
Equipment Repair <sup>2</sup>	8	3	41.0	LDA/LDT	586.25	7.03
Equipment Repair <sup>2</sup>		3	41.0	HHDT	494.38	8.90
Helicopter Inspection	2	1	67.0	Helicopter	7,614.46	3.81
<b>Total</b>					<b>176.55</b>	

1. Operational Emissions would result primarily from mobile sources including all operation and maintenance vehicles. It was assumed operation of the O&M building and Substation would not result in area source emissions generated from natural gas or landscaping.

2. Conservatively estimated employees for O&M would be coming from Alpine + length of the gen-tie line = 41 miles one-way

3. Patrick Rowe, Soitec; correspondence with Jason Paukovits - AECOM

4. Assumed 22 work days per month for 12 months = 264 days/year for worker vehicles

Assumed washing would occur every 6-8 weeks or 9 washings per year, 4 days/wash = 36 days/year for washing vehicles

### Helicopter GHG Emissions

Model <sup>5</sup>	Fuel Consumption <sup>6</sup> (gal/hr)	Emission Factor (kg CO2/gal) <sup>7</sup>	CO2 Emissions (lbs/hr)	Useage (hrs/day)	Useage (days/yr)
<b>Bell 206</b>	<b>26</b>	<b>8.32</b>	<b>475.904</b>	<b>8</b>	<b>2</b>

5. Bell 206 helicopter is representative of type of helicopter for use during operation and maintenance

6. Source: Interagency Aviation Training. 2010. Aircraft Identification Library. ([https://www.iat.gov/aircraft\\_library/index.asp](https://www.iat.gov/aircraft_library/index.asp)). U.S. Department of Interior, National Business Center, Aviation Management Directive accessed November 28, 2012 at (<http://amd.nbc.gov/akro/akflight/pdf/ex2.pdf>)

7. Source: California Climate Action Registry. 2009. *General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.1, Tables C.3 and C.6.*

**Tierra del Sol Solar Farm Project  
GHG Emissions Summary**

	<b>CO<sub>2</sub></b> <b>(tons/yr)</b>	<b>CO<sub>2</sub>E</b> <b>(Mtons/yr)</b>
<b>CONSTRUCTION</b>		
<b>2014</b>		
Off-Road Diesel	1,302.08	1,192.04
Diesel Trucks	1,347.51	1,223.80
Passenger Vehicles	385.39	368.03
<b>Total for 2014</b>	<b>3,034.98</b>	<b>2,783.86</b>
<b>2015</b>		
Off-Road Diesel	205.33	187.98
Diesel Trucks	289.27	262.71
Passenger Vehicles	184.61	176.29
<b>Total for 2015</b>	<b>679.20</b>	<b>626.98</b>
<i>Amortized Construction Emissions</i>		<i>113.69</i>
<b>OPERATION</b>		
Light-Duty Vehicles	107.44	102.60
Heavy-Duty Diesel Trucks	9.62	8.74
Helicopter	3.81	3.53
Emergency Generators	55.68	50.97
Electrical Generation		275.04
Water Supply		1.96
Wastewater		0.09
<b>Total Operational</b>	<b>176.55</b>	<b>442.94</b>

**Tierra del Sol Solar Farm Project  
CO<sub>2</sub>-to-CO<sub>2</sub> Equivalent Factors**

	<b>Source</b>	<b>Units</b>	<b>CO<sub>2</sub></b>	<b>CH<sub>4</sub></b>	<b>N<sub>2</sub>O</b>	<b>CO<sub>2</sub>E/CO<sub>2</sub></b>
Global Warming Potential			1	21	310	
Diesel Equipment	1	kg/gal	10.15	0.00058	0.00026	1.009
Diesel Trucks	2	g/mi	1,450.00	0.0051	0.0048	1.001
Passenger Vehicles	3					1.053
Helicopters	4	g/gal	8,320.00	7.04	0.11	1.022
Electrical Generation	5	lb/MWh	550.18	0.0302	0.0081	1.006

Serving Utility:                   SDG&E

1. California Climate Action Registry. 2009. *General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions*, Version 3.1, Tables C.6 and C.7.
2. California Climate Action Registry. 2009. *General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions*, Version 3.1, Tables C.3 and C.4.
3. US EPA, Office of Transportation and Air Quality. 2005. *Greenhouse Gas Emissions from a Typical Passenger Vehicle* (EPA420-F-05-004), p. 4.
4. California Climate Action Registry. 2009. *General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions*, Version 3.1, Tables C.3 and C.6.
5. San Diego Gas & Electric. 2010. Annual Entity Emissions: Electric Power Generation/Electric Utility Sector. [http://www.climateregistry.org/CarrotDocs/35/2009/2008\\_SDGE\\_PUP\(March 26\).xls](http://www.climateregistry.org/CarrotDocs/35/2009/2008_SDGE_PUP(March 26).xls) adjusted to reflect an increase in renewables from 10% in 2009 to 33% in 2020 and California Climate Action Registry. 2009. *General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions*, Version 3.1, Table C.2.

**Tierra del Sol Solar Farm Project  
Greenhouse Gas Emissions from Project Electrical Demand**

<b>Land Use</b>	<b>Units</b>	<b>Electrical Demand Factor<sup>1</sup> (kW-hr/unit/yr)</b>	<b>Electric Demand (kW-hr/yr)</b>	<b>CO<sub>2</sub>E Emission Factor<sup>2</sup> (lbs CO<sub>2</sub>E/kW-hr)</b>	<b>Annual CO<sub>2</sub>E Emissions (Mtons CO<sub>2</sub>E/yr)</b>
Miscellaneous (O&M Bldg.)	7.50 ksf	9,720	72,900	0.553	18.30
Trackers/Inverters/Other			1,022,959	0.553	256.75
<b>Total</b>			<b>1,095,859</b>		<b>275.04</b>

Utility Region: SDG&E

Sources:

1. Itron, Inc. 2006. *California Commercial End-Use Survey*. Prepared for California Energy Commission, CEC-400-2006-005. March.
2. San Diego Gas & Electric. 2010. Annual Entity Emissions: Electric Power Generation/Electric Utility Sector. [http://www.climateregistry.org/CarrotDocs/35/2009/2008\\_SDGE\\_PUP\(March 26\).xls](http://www.climateregistry.org/CarrotDocs/35/2009/2008_SDGE_PUP(March 26).xls)  
adjusted to reflect an increase in renewables from 10% in 2009 to 33% in 2020 and California Climate Action Registry. 2009. *General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions*, Version 3.1, Table C.2.

Notes:

CO<sub>2</sub>E      Carbon dioxide equivalent  
kW-hr      kilowatt-hour  
MT          metric tons (= 2,204.623 lbs)

**Tierra del Sol Solar**  
**Other Operational Electricity Usage**

Equipment (per tracker)	Electrical Draw (watts)	Notes	Daily Operating Hours	Annual Electricity Usage (kWh)
Tracker Control Unit	50	Control unit uses energy during sunlight hours only.	12	219
Tracker Motor	250	Tracker motor runs for 1 minute every hour	12	18
Air Drying Unit	192	Air drying unit runs 1 hour per day and 10 hours every 3 weeks		103
<b>Total per Tracker</b>				<b>341</b>
Number of Trackers	2,657			
<b>Total Annual Electricity Usage</b>				<b>905,001</b>
Equipment (per Building Block)	Electrical Draw (watts)	Notes	Daily Operating Hours	Annual Energy Usage (kWh)
Field Communications	300	Operates during sunlight hours	12	1,314
Inverters	100	Operates at night	12	438
PV Box Ventilation	173	Operates during sunlight hours	12	758
<b>Total per Building Block</b>				<b>2,510</b>
Number of Building Blocks	47			
<b>Total Annual Electricity Usage</b>				<b>117,958</b>
<b>Grand Total Annual Electricity</b>				<b>1,022,959</b>

**Tierra del Sol Solar Farm Project  
Greenhouse Gas Emissions from Project Water Supply**

<b>Land Use</b>	<b>Units</b>	<b>Acre-Feet per Year<sup>1</sup></b>	<b>Electrical Demand Factor<sup>2</sup> (kW-hr/AF)</b>	<b>Electric Demand (kW-hr/yr)</b>	<b>CO<sub>2</sub>E Emission Factor<sup>3</sup> (lbs CO<sub>2</sub>E/kW-hr)</b>	<b>Annual CO<sub>2</sub>E Emissions (Mtons CO<sub>2</sub>E/yr)</b>
N/A	N/A	3.68	2,117	7,791	0.553	1.96

Sources:

1. Project Description for the Tierra del Sol Solar Project - Average monthly water usage is 10,472 gallons  
<http://www.sandiego.gov/water/conservation/tips.shtml>
2. California Energy Commission. 2006. *Refining Estimates of Water Related Energy Use in California*.  
(Northern California factor for water supply and conveyance for local (non-SWP) water)  
<http://www.energy.ca.gov/2006publications/CEC-500-2006-118/CEC-500-2006-118.PDF>
3. San Diego Gas & Electric. 2010. Annual Entity Emissions: Electric Power Generation/Electric Utility Sector.  
[http://www.climateregistry.org/CarrotDocs/35/2009/2008\\_SDGE\\_PUP\(March 26\).xls](http://www.climateregistry.org/CarrotDocs/35/2009/2008_SDGE_PUP(March 26).xls)  
and California Climate Action Registry. 2009. *General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions*  
Version 3.1, Table C.2.

Notes:

CO<sub>2</sub>E      Carbon dioxide equivalent  
kW-hr      kilowatt-hour  
Mtons      metric tons (= 2,204.62 lbs)

**Tierra del Sol Solar Farm Project  
Greenhouse Gas Emissions from Project Wastewater Treatment**

<b>Gallons/Day</b>	<b>Liters/Day</b>	<b>Liter/Year</b>	<b>CH<sub>4</sub> Emission Factor<sup>2</sup> (MT/liter)</b>	<b>Annual CH<sub>4</sub> Emissions (Mton CH<sub>4</sub>/yr)</b>	<b>Annual CO<sub>2</sub>E Emissions (Mtons CO<sub>2</sub>E/yr)</b>
75	284	74,943	6.00E-08	0.004	0.09

Sources:

1. Daily wastewater generation from County of San Diego. 2010. Design Manual for Onsite Wastewater Treatment Systems, p. 38. (5 gal/person for day workers at offices per shift, 5 employees)
2. CH<sub>4</sub> emission factor from Environ. 2011. CalEEMod User's Guide, p. 33.

Notes:

CH<sub>4</sub>            methane  
CO<sub>2</sub>E         Carbon dioxide equivalent  
Mtons         metric tons (= 2,204.62 lbs)

### Tierra del Sol GHG Emissions Offset

Maximum Installed Capacity (MW <sub>DC</sub> )	kWh <sub>AC</sub> per Installed kW <sub>DC</sub>	Annual Output (kWh/yr)	
80	2,083	166,640,000	
CO <sub>2</sub> Emission Factor (lb/kWh)	CH <sub>4</sub> Emission Factor (lb/kWh)	N <sub>2</sub> O Emission Factor (lb/kWh)	Annual GHG Offset (MT CO <sub>2</sub> E/yr)
1.071	0.000029	0.000014	81,334

**Notes:**

CO<sub>2</sub> emission factor based on 739.05 lb/MWh in 2008 and adjustment for 10% renewables/3% large hydro/18% nuclear in 2009 (no Power Content Label available for 2008)  
[http://www.sdge.com/sites/default/files/FINAL092610\\_PowerLabel.pdf](http://www.sdge.com/sites/default/files/FINAL092610_PowerLabel.pdf)

**Greenhouse Gas Analysis  
Tierra del Sol Solar Farm Project  
Major Use Permit 3300-12-010  
Rezone 3600-12-005  
Boulevard, San Diego County, California**

*Project Proponent:*

**Tierra del Sol LLC**  
c/o Soitec Solar Development LLC  
4250 Executive Square, Suite 770  
San Diego, California 92037

*Prepared by:*

**DUDEK**  
605 Third Street  
Encinitas, California 92024  
Contact: David Deckman

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~~DECEMBER~~ FEBRUARY 2012 2013



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## GLOSSARY OF TERMS AND ACRONYMS

<a href="#">AB</a>	<a href="#">Assembly Bill</a>
<a href="#">CAFE</a>	<a href="#">Corporate Average Fuel Economy</a>
<a href="#">CAP</a>	<a href="#">Climate Action Plan</a>
<a href="#">CAPCOA</a>	<a href="#">California Air Pollution Control Officers Association</a>
CARB	California Air Resources Board
<a href="#">CCAR</a>	<a href="#">California Climate Action Registry</a>
<a href="#">CDFW</a>	<a href="#">California Department of Fish and Wildlife</a>
CEC	California Energy Commission
<a href="#">CEQA</a>	<a href="#">California Environmental Quality Act</a>
CO <sub>2</sub>	<a href="#">cCarbon dioxide</a>
CO <sub>2</sub> E	<a href="#">cCarbon dioxide equivalent</a>
<a href="#">CPUC</a>	<a href="#">California Public Utilities Commission</a>
<a href="#">CPV</a>	<a href="#">concentrating photovoltaic</a>
CH <sub>4</sub>	<a href="#">mMethane</a>
CEQA	California Environmental Quality Act
EPA	Environmental Protection Agency
<a href="#">GHG</a>	<a href="#">greenhouse gas</a>
<a href="#">GWP</a>	<a href="#">global warming potential</a>
<a href="#">HFC</a>	<a href="#">hydrofluorocarbon</a>
kW	<a href="#">kKilowatts</a>
<a href="#">mpg</a>	<a href="#">miles per gallon</a>
<a href="#">MUP</a>	<a href="#">Major Use Permit</a>
<a href="#">MSCP</a>	<a href="#">Multiple Species Conservation Program</a>
MW	<a href="#">mMegawatts</a>
<a href="#">NF<sub>3</sub></a>	<a href="#">nitrogen trifluoride</a>
<a href="#">NHTSA</a>	<a href="#">National Highway Traffic Safety Administration</a>
N <sub>2</sub> O	nitrous oxide
<a href="#">O<sub>3</sub></a>	<a href="#">ozone</a>
<a href="#">O&amp;M</a>	<a href="#">operations and maintenance</a>
<a href="#">OPR</a>	<a href="#">Governor's Office of Planning and Research</a>
<a href="#">PFC</a>	<a href="#">perfluorocarbon</a>
<a href="#">RFS</a>	<a href="#">Renewable Fuel Standard</a>
<a href="#">SDG&amp;E</a>	<a href="#">San Diego Gas &amp; Electric</a>
SDAPCD	San Diego County Air Pollution Control District
<a href="#">SDCGHGI</a>	<a href="#">San Diego County Greenhouse Gas Inventory</a>
<a href="#">SF<sub>6</sub></a>	<a href="#">sulfur hexafluoride</a>

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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<u>U.S.</u>	<u>United States</u>
<u>USFWS</u>	<u>U.S. Fish and Wildlife Service</u>
<u>USGS</u>	<u>U.S. Geological Survey</u>
<u>V</u>	<u>volt</u>
<u>VMT</u>	<u>vehicle miles traveled</u>

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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## EXECUTIVE SUMMARY

The proposed Tierra Del Sol Solar Farm Project (project) would produce up to 60 megawatts (MW) (alternating current) of electricity and would consist of approximately 2,657 concentrating photovoltaic (CPV) trackers on 420 acres in southeastern San Diego County near the unincorporated community of Boulevard, California. As proposed, the project will be developed in two phases. Phase I would include the construction and operation of 45 MW on approximately 330 acres. Phase II would consist of the construction and operation of 15 MW on approximately 90 acres.

The greenhouse gas (GHG) analysis evaluates the potential for significant adverse impacts related to GHG emissions and climate change as a result of the proposed project's construction and operational emissions.

GHG emissions generated by the proposed project associated with construction equipment and vehicles, operations and maintenance vehicular traffic, electrical generation, and water supply were estimated. The amortized annual construction emissions are included in the overall GHG emission estimates. The estimated GHG emissions would be ~~557~~<sup>505</sup> metric tons carbon dioxide equivalent (CO<sub>2</sub>E) per year. As such, project emissions would not exceed the 900-metric-ton threshold as indicated in the County of San Diego's DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan (County of San Diego 2010a), which was used as guidance for determining significance of GHG emissions from project implementation.

Based on estimates by the project proponent, the project would generate 2,083 kilowatt-hours alternating current annually per installed kilowatt (based on the direct current capacity of the CPV trackers). This factor reflects the available daylight hours, conversion of direct current to alternating current, and various system losses. Using the installed CPV capacity of 80 MW (80,000 kilowatts) direct current, the project is anticipated to generate 166,640,000 kilowatts per year. ~~Based on reported CO<sub>2</sub> emissions per kilowatt hour for San Diego Gas & Electric (SDG&E) in 2008 (SDG&E 2010), and an adjustment to reflect electricity from renewable energy, large hydroelectric, and nuclear sources in 2009 (SDG&E n.d.), which do not generate GHG emissions, the potential CO<sub>2</sub> reduction would be 1.071 pounds CO<sub>2</sub> per kilowatt hour. Thus, †~~The proposed project would provide a potential reduction of 81,334 metric tons CO<sub>2</sub>E per year if the electricity generated by the proposed ~~product-project~~ were to be used instead of electricity generated by fossil-fuel sources. After accounting for the amortized construction and annual operational emissions of ~~505-557~~ metric tons CO<sub>2</sub>E per year, the net reduction in GHG emissions would be 80, ~~829-777~~ metric tons CO<sub>2</sub>E per year. This reduction is not considered in the significance determination of the proposed project's GHG emissions but is provided for disclosure purposes.

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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## 1.0 INTRODUCTION

### 1.1 Purpose of the Report

The purpose of this report is to estimate and evaluate the greenhouse gas (GHG) emission impacts associated with construction and operation of the proposed project and their potential contribution to climate change. Impacts relative to climate change are evaluated based on guidance provided in the County of San Diego's (County's) *DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan* (County of San Diego 2010[a](#)).

### 1.2 Project Location and Description

#### Solar Farm

The proposed project is situated south of Tierra Del Sol Road and immediately north of the US/Mexico International Border, approximately 3.5 miles south of SR-94 in the eastern portion of unincorporated San Diego County. Figure 1, Regional Map, shows the project's relationship within San Diego County. Figure 2, Vicinity Map, shows the project's relationship to the surrounding unincorporated community of Boulevard.

The proposed Tierra Del Sol Solar Farm Project (project) would produce up to 60 megawatts (MW) (alternating current) of solar energy and would consist of approximately 2,657 concentrating photovoltaic (CPV) trackers on 420 acres in southeastern San Diego County near the unincorporated community of Boulevard, California. As proposed, the project will be developed in two phases. Phase I would include the construction and operation of 45 MW (1,993 CPV trackers) on approximately 330 acres. Phase II would consist of the construction and operation of 15 MW (664 CPV trackers) on approximately 90 acres (Figure 3, Preliminary Site Plan). The project includes a Major Use Permit (MUP) to authorize a Major Impact Utility Pursuant to Sections 1350, 2705, and 2926 of the Zoning Ordinance. The project will also require a Rezone to remove Special Area Designator "A" and ensure compliance with Section 5100 of the Zoning Ordinance. An Agricultural Preserve Disestablishment will also be required to develop the project site as proposed.

Individual tracker dimensions are approximately 48 feet across by 25 feet tall. Each CPV Tracker unit would be mounted on a 28-inch steel mast (steel pole), which would be supported by either (i) extending it into the ground up to 20 feet and encasing it in concrete, or (ii) attaching it to a concrete foundation sized to be suitable to adequately support the CPV Tracker based on wind loading and soil conditions at the site. The preferred method would be to set the mast by vibratory pile driving methods depending upon soil conditions.

## Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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In its most vertical position and depending on foundation design, the top of each tracker would not exceed 30 feet above grade, and the lower edge would not be less than 1 foot above ground level. In its horizontal “stow” mode (for high winds), each tracker would have a minimum ground clearance of 13 feet 6 inches.

Power from the CPV system in each building block would be delivered from each tracker to a conversion station through a 1,000 volt (V) DC underground collection system. The underground 1,000 V DC collection system construction footprint would include a trench of 1 to 2 feet in width and a depth of up to approximately 4 feet. It is anticipated that power from the CPV systems on site would be separated into three 34.5-kilovolt (kV) underground collection circuits, each delivering approximately 20 MW of power to the project substation.

Each 34.5 kV underground branch circuit associated with Phase I would connect to a 34.5 kV overhead trunk line on the project site for delivery to the project substation. These two collection circuits for Phase I would be run overhead on an above ground trunk line adjacent to the south side of the Southwest Power Link right of way. This trunk line would be approximately 1.2 miles long and would have two 34.5 kV circuits and deliver a total of 45 MW. The above ground trunk line would utilize steel poles and would be approximately 50 to 75 feet high and spaced about 300 to 500 feet apart. The minimum ground clearance of the 34.5 kV lines would be 30 feet. The maximum hole dimensions for steel pole foundations would be 24 inches in diameter and approximately 20 feet deep. Phase 2 will connect to the project substation entirely via one 34.5 kV underground branch circuit and the underground 34.5 kV collection system construction footprint would include a trench of three to four feet in width and a depth of up to approximately four feet. Base material would be installed in all trenches to (i) ensure adequate drainage, and (ii) to ensure sufficient thermal conductivity and electrical insulating characteristics below and above collection system cables.

The project will include construction of a 34.5/138 kV step-up substation site (located within the northeast corner of the project site and adjacent to the [operations and maintenance \(O&M\)](#) annex site), which would increase the voltage received from the overhead and underground collector system from 34.5 to 138 kV. Switching and transformer equipment as well as a control house and a parking area for utility vehicles would be located within the 3-acre substation site and for security purposes (and to allow for nighttime inspections) lighting would be installed near substation equipment, the control shelter, and on the entrance gates.

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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Figure 1 Regional Map

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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Figure 2 Vicinity Map

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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Figure 3 Preliminary Site Plan

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## Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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A backup power and storm positioning system would bring the CPV system into the horizontal position (“storm position”) in case the electrical power is cut or if there is an approaching storm that could be damaging to the CPV System. The backup power and storm positioning system would consist of two redundant systems: (1) two independent sets of emergency generators, or (2) two independent sources of utility-supplied power. If emergency generators would be used, they would be nominally rated at 680 kilowatts (kW) each.

A 4-acre ~~operations and maintenance (O&M)~~ annex site would be located adjacent to the substation site and would house operations and maintenance supplies, telecommunications equipment and rest facilities all within a 7,500-square-foot, single-story building. It is anticipated that in-place tracker washing would occur every 6 to 8 weeks by mobile crews who will also be available for dispatch whenever on-site repairs or other maintenance are required. Tracker washing will be undertaken using a tanker truck and smaller “satellite” tracker washing trucks. On-site water storage tanks may be installed to facilitate washing.

Project construction would consist of several phases including site preparation, development of staging areas and site access roads, solar CPV assembly and installation, and construction of electrical transmission facilities. The project would require a total of approximately 352 acres of site preparation activities prior to solar CPV installation, in addition to approximately 66 acres of fire buffer preparation involving non-motorized brush clearing techniques. After site preparation, initial project construction would include the development of the staging and assembly areas, and the grading of site access roads for initial CPV installation. The project would be constructed over a period of up to approximately 12 months, which includes both Phase I and II.

### Gen-Tie Line

Power from the on-site private substation would be delivered to the 138 kV bus at SDG&E’s rebuilt Boulevard Substation via an approximate 6.5-mile 138 kV transmission line or gen-tie line within a 125-foot private right-of-way. The 138 kV transmission line would travel in a roughly northeasterly direction over private land from the on-site private substation to SDG&E’s rebuilt Boulevard Substation.

The gen-tie alignment would require the setting of new steel transmission poles and conductor installed along the poles to deliver power from the project site to the nearest substation. Access to each steel pole location would be constructed prior to clearing activities. Once access has been established, temporary work area measuring 80 feet x 80 feet around each steel pole location would be cleared of vegetation in order to assist in pole installation.

## Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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Each transmission line pole would have a maximum height of 97 feet depending upon location. The span lengths between poles would be dependent on terrain. The cable span lengths would generally be 650 feet. Given the project alignment is approximately 6 miles it is anticipated the gen-tie would require construction of approximately 49 steel poles.

Several of the pole site locations are accessible from existing dirt access roads; however, new access roads will need to be constructed at some pole locations. Based on a preliminary design, it is anticipated that approximately 1.5 miles of new access roads will be required for construction of the steel poles. The total disturbance associated with access roads, pull sites and staging areas is anticipated to be approximately 18.2 acres.

To install the steel poles for the gen-tie, access roads will need to be constructed to access pole locations where existing access roads are not present. Steel poles will be installed into the excavation which is likely to be around 10 to 20 feet deep, depending on the soils and height of the pole. Holes will be formed via use of a truck-mounted auger and will excavate between 8 to 12 cubic yards of soil. Poles will then be delivered to the site via a flat-bed truck and lifted into place with a crane. The gap between the excavation and steel pole will then be backfilled with concrete.

Conductor wire stringing will be completed following pole installation. The work will be primarily completed from bucket trucks and pull sites located along the right of way. Rollers will be temporarily attached to the lower end of the insulators to allow the conductor to be pulled along the line. A rope will then be pulled onto the rollers from structure to structure. Once the rope is in place, it will be attached to a steel cable and pulled back through the sheaves. The conductor will then be attached and pulled back through the sheaves and into place using conventional tractor-trailer pulling equipment located at pull and tension sites along the line. The pulling through each structure will be done under a controlled tension to keep it elevated and away from obstacles.

Construction of the gen-tie alignment is anticipated to take place over a 6-month period, commencing immediately after the first construction phase, which includes site demolition, clearing, grubbing, grinding, and road construction. Access road construction will occur for the first 2 months of construction followed by pole foundation excavation and installation for 2 months and conductor stringing for 2 months.

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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## 2.0 EXISTING CONDITIONS

### 2.1 Existing Setting

#### Project Site

The project is situated south of Tierra Del Sol Road and immediately north of the United States (U.S.)–Mexico International Border and is traversed by San Diego Gas & Electric’s 500 kV Southwest Power Link, which consists of 4 lattice steel towers. The site area lies within the Tierra Del Sol U.S. Geological Survey (USGS) 7.5-minute quadrangle, Township 18 South, Range 6 East, Section 13.

The project site is undeveloped but has remnants of some small structures associated with previous ranching activities located near the western portion and middle of the project site that would be demolished during construction. The entire project site is fenced. The U.S.–Mexico border fence is located adjacent to the southern portion of the project site. The area is accessed through locked gates and dirt roads that traverse the project site. Nearby sensitive receptors include single-family residences located adjacent to the project site.

The project site is located in a desert transition zone dominated by the chaparral plant community. The site was previously utilized for an active ranching operation. The project site is within the Boulevard Community Planning Area of San Diego County’s General Plan; the land use designation is Rural with a permitted density of 1 dwelling unit per 80 acres. Existing zoning is General Rural (S92) and Agriculture (A72). The Boulevard planning area requires a minimum lot size of 1 unit per eight acres due to the County’s Groundwater Ordinance. The site is located at an elevation of approximately 3,700 to 3,566 feet above mean sea level. The project site is located within San Diego County’s draft East County Multiple Species Conservation Program (MSCP) Plan Area. The majority of the project site was previously disturbed by extensive grazing activities; however, chaparral vegetation has become more established which provides moderate value for wildlife species.

### 2.2 The Greenhouse Effect and Greenhouse Gases

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind, lasting for an extended period (decades or longer).

Gases that trap heat in the atmosphere are often called “greenhouse gases” (GHGs). The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long-wave radiation; and GHGs in the upper atmosphere absorb this long-wave

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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radiation and emit it into space and toward the Earth. This “trapping” of the long-wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect. Principal GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), ozone (O<sub>3</sub>), and water vapor (H<sub>2</sub>O). Some GHGs, such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO<sub>2</sub> and CH<sub>4</sub> are emitted in the greatest quantities from human activities. Emissions of CO<sub>2</sub> are largely byproducts of fossil fuel combustion, whereas CH<sub>4</sub> results mostly from off-gassing associated with agricultural practices and landfills. Man-made GHGs, which have a much greater heat-absorption potential than CO<sub>2</sub>, include fluorinated gases, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>), which are associated with certain industrial products and processes (CAT 2006).

The greenhouse effect is a natural process that contributes to regulating the earth’s temperature. Without it, the temperature of the Earth would be about 0°F (–18°C) instead of its present 57°F (14°C). Global climate change concerns are focused on whether human activities are leading to an enhancement of the greenhouse effect (National Climatic Data Center 2009).

The effect each GHG has on climate change is measured as a combination of the mass of its emissions and the potential of a gas or aerosol to trap heat in the atmosphere, known as its “global warming potential” (GWP). GWP varies between GHGs; for example, the GWP of CH<sub>4</sub> is 21, and the GWP of N<sub>2</sub>O is 310. Total GHG emissions are expressed as a function of how much warming would be caused by the same mass of CO<sub>2</sub>. Thus, GHG gas emissions are typically measured in terms of pounds or tons of “CO<sub>2</sub> equivalent” (CO<sub>2</sub>E).<sup>1</sup>

## 2.3 Contributions to Greenhouse Gas Emissions

In 2010, the United States produced 6,822 million metric tons of CO<sub>2</sub>E (MMT CO<sub>2</sub>E) (EPA 2012). The primary GHG emitted by human activities in the United States was CO<sub>2</sub>, representing approximately 84% of total GHG emissions. The largest source of CO<sub>2</sub>, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 94% of the CO<sub>2</sub> emissions and 78% of overall GHG emissions.

According to the 2009 GHG inventory data compiled by the California Air Resources Board (CARB) for the California Greenhouse Gas Inventory for 2000–2009, California emitted 457 MMT CO<sub>2</sub>E of GHGs, including emissions resulting from out-of-state electrical generation (CARB 2011). The primary contributors to GHG emissions in California are transportation,

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<sup>1</sup> The CO<sub>2</sub> equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, such that MTCO<sub>2</sub>E = (metric tons of a GHG) x (GWP of the GHG). For example, the GWP for CH<sub>4</sub> is 21. This means that emissions of 1 metric ton of methane are equivalent to emissions of 21 metric tons of CO<sub>2</sub>.

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electric power production from both in-state and out-of-state sources, industry, agriculture and forestry, and other sources, which include commercial and residential activities. These primary contributors to California's GHG emissions and their relative contributions in 2009 are presented in Table 1, GHG Sources in California.

**Table 1**  
**GHG Sources in California**

Source Category	Annual GHG Emissions (MMT CO <sub>2</sub> E)	% of Total
Agriculture	32.13	7.03%
Commercial and residential	42.95	9.40%
Electricity generation	103.58a	22.68%
Forestry (excluding sinks)	0.19	0.04%
Industrial uses	81.36	17.81%
Recycling and waste	7.32	1.60%
Transportation	172.92	37.86%
High-GWP substances	16.32	3.57%
<b>Totals</b>	<b>456.77</b>	<b>100.00%</b>

Source: CARB 2011.

Notes: <sup>a</sup>Includes emissions associated with imported electricity, which account for 48.05 MMTCO<sub>2</sub>E annually.

### 2.4 Potential Effects of Human Activity on Climate Change

According to ~~the California Air Resources Board (CARB)~~, some of the potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high O<sub>3</sub> days, more large forest fires, and more drought years (CARB 2006). Several recent studies have attempted to explore the possible negative consequences that climate change, left unchecked, could have in California. These reports acknowledge that climate scientists' understanding of the complex global climate system, and the interplay of the various internal and external factors that affect climate change, remains too limited to yield scientifically valid conclusions on such a localized scale. Substantial work has been done at the international and national level to evaluate climatic impacts, but far less information is available on regional and local impacts.

The primary effect of global climate change has been a rise in average global tropospheric temperature of 0.2°C per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling using 2000 emission rates shows that further warming would occur, which would induce further changes in the global climate system during the current century. Changes to the global climate system and ecosystems and to California would include, but would not be limited to:

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- The loss of sea ice and mountain snowpack resulting in higher sea levels and higher sea surface evaporation rates with a corresponding increase in tropospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures (IPCC 2007)
- A rise in global average sea level primarily due to thermal expansion and melting of glaciers and ice caps and the Greenland and Antarctic ice sheets (IPCC 2007)
- Changes in weather that includes widespread changes in precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones (IPCC 2007)
- A decline of Sierra snowpack, which accounts for approximately half of the surface water storage in California, by 70% to as much as 90% over the next 100 years (CAT 2006)
- An increase in the number of days conducive to O<sub>3</sub> formation by 25% to 85% (depending on the future temperature scenario) in high O<sub>3</sub> areas of Los Angeles and the San Joaquin Valley by the end of the 21st century (CAT 2006)
- High potential for erosion of California's coastlines and sea water intrusion into the Delta and levee systems due to the rise in sea level (CAT 2006).

## 2.5 Regulatory Setting

### 2.5.1 Federal Activities

*Massachusetts vs. EPA.* On April 2, 2007, in *Massachusetts v. EPA*, the Supreme Court directed the U.S. Environmental Protection Agency (EPA) Administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the EPA Administrator is required to follow the language of Section 202(a) of the federal Clean Air Act. On December 7, 2009, the Administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- The Administrator found that elevated concentrations of GHGs—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the “endangerment finding.”
- The Administrator further found the combined emissions of GHGs—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the “cause or contribute finding.”

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These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

***Energy Independence and Security Act.*** On December 19, 2007, President Bush signed the Energy Independence and Security Act of 2007. Among other key measures, the Act would do the following, which would aid in the reduction of national GHG emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022
2. Set a target of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020 and directs National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks
3. Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

***EPA and NHTSA Joint Final Rule for Vehicle Standards.*** On April 1, 2010, the EPA and NHTSA announced a joint final rule to establish a national program consisting of new standards for light-duty vehicles model years 2012 through 2016. The joint rule is intended to reduce GHG emissions and improve fuel economy. The EPA is finalizing the first-ever national GHG emissions standards under the Clean Air Act, and NHTSA is finalizing Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act (EPA 2010). This final rule follows the EPA and Department of Transportation's joint proposal on September 15, 2009, and is the result of the President Obama's May 2009 announcement of a national program to reduce greenhouse gases and improve fuel economy (EPA 2011). The final rule became effective on July 6, 2010 (EPA and NHTSA 2010).

The EPA GHG standards require new passenger cars, light-duty trucks, and medium-duty passenger vehicles to meet an estimated combined average emissions level of 250 grams of CO<sub>2</sub> per mile in model year 2016, equivalent to 35.5 mpg if the automotive industry were to meet this CO<sub>2</sub> level through fuel economy improvements alone. The CAFE standards for passenger cars and light trucks will be phased in between 2012 and 2016, with the final standards equivalent to 37.8 mpg for passenger cars and 28.8 mpg for light trucks, resulting in an estimated combined average of 34.1 mpg. Together, these standards will cut GHG emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program. The rules will simultaneously reduce GHG

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emissions, improve energy security, increase fuel savings, and provide clarity and predictability for manufacturers (EPA 2011).

In 2011, the EPA and NHTSA approved the first-ever program to reduce GHG emissions and increase fuel efficiency for medium- and heavy-duty vehicles (EPA and NHTSA 2011). Effective November 14, 2011, the CO<sub>2</sub> emissions and fuel efficiency standards of this regulation apply to model year 2014 to 2018 combination tractors (i.e., semi-trucks), heavy-duty pickup trucks and vans, and vocational vehicles including transit and school buses. This regulation covers vehicles with a gross vehicle weight rating of 8,500 pounds or greater; medium-duty passenger vehicles are covered by the previous regulation for passenger cars and light-duty trucks. In addition, the EPA has adopted standards to control HFC leakage from air conditioning systems in combination tractors and heavy-duty pickup trucks and vans as well as CH<sub>4</sub> and N<sub>2</sub>O standards for heavy-duty engines, pickup trucks, and vans. Phased in through model year 2017, the CO<sub>2</sub> and fuel consumption standards for combination trailers depend on the weight class, cab type, and roof length. The CO<sub>2</sub> standards are expressed in grams CO<sub>2</sub> per ton-mile, while the fuel consumption standards are expressed in gallons per 1,000 ton-miles, each accounting for the carrying capacity of the tractor and trailer. These standards represent an overall fuel consumption and CO<sub>2</sub> emissions reduction of up to 23% when compared to a baseline 2010 model year. The CO<sub>2</sub> and fuel consumption standards for heavy-duty pickup trucks and vans are applied as corporate average values and are phased in with increasing stringency from model year 2014 to 2018. The final EPA standards for heavy-duty pickup trucks and vans for 2018 (including a separate standard to control air conditioning system leakage) represent a GHG reduction of 17% for diesel vehicles and 12% for gasoline vehicles compared to a 2010 baseline. Due to the variety of vocational vehicles, many of which involve a body installed on a chassis, the CO<sub>2</sub> and fuel consumption standards are applied to the chassis manufacturers. Like the CO<sub>2</sub> and fuel consumption standards for combination tractors, the standards for vocational vehicles are expressed in grams CO<sub>2</sub> per ton-mile and gallons per 1,000 ton-miles, respectively. Upon final implementation, the EPA standards for vocational vehicles, which apply initially to model year 2014 to 2016 and then to model year 2017 vehicles, are expected to reduce GHG emissions by 6 to 9% compared to a 2010 baseline.

In August 2012, the EPA and NHTSA approved a second round of GHG and CAFE standards for model years 2017 and beyond (EPA and NHTSA 2012). These standards will reduce motor vehicle GHG emissions to 163 grams of CO<sub>2</sub> per mile, which is equivalent to 54.5 mpg if this level were achieved solely through improvements in fuel efficiency, for cars and light-duty trucks by model year 2025. A portion of these improvements, however, will likely be made through improvements in air conditioning leakage and through use of alternative refrigerants, which would not contribute to fuel economy. The first phase of the CAFE standards, for model year 2017 to 2021, are projected to require, on an average industry fleet-wide basis, a range from

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40.3 to 41.0 mpg in model year 2021. The second phase of the CAFE program, for model years 2022 to 2025, are projected to require, on an average industry fleet-wide basis, a range from 48.7 to 49.7 mpg in model year 2025. The second phase of standards have not been finalized due to the statutory requirement that NHTSA set average fuel economy standards not more than five model years at a time. The regulations also include targeted incentives to encourage early adoption and introduction into the marketplace of advanced technologies to dramatically improve vehicle performance, including:

- Incentives for electric vehicles, plug-in hybrid electric vehicles, and fuel cells vehicles
- Incentives for hybrid technologies for large pickups and for other technologies that achieve high fuel economy levels on large pickups
- Incentives for natural gas vehicles
- Credits for technologies with potential to achieve real-world greenhouse gas reductions and fuel economy improvements that are not captured by the standards test procedures.

### 2.5.2 State of California

**Assembly Bill (AB) 1493.** In a response to the transportation sector accounting for more than half of California's CO<sub>2</sub> emissions, AB 1493 (Pavley) was enacted on July 22, 2002. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. When fully phased in, the near-term (2009–2012) standards will result in a reduction of about 22% in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term (2013–2016) standards will result in a reduction of about 30%.

Before these regulations could go into effect, the EPA had to grant California a waiver under the federal Clean Air Act, which ordinarily preempts state regulation of motor vehicle emission standards. The waiver was granted by Lisa Jackson, the EPA Administrator, on June 30, 2009. On March 29, 2010, the CARB Executive Officer approved revisions to the motor vehicle GHG standards to harmonize the state program with the national program for 2012–2016 model years (see “EPA and NHTSA Joint Final Rule for Vehicle Standards” above). The revised regulations became effective on April 1, 2010.

**Executive Order S-3-05.** In June 2005, Governor Schwarzenegger established California's GHG emissions reduction targets in Executive Order S-3-05. The Executive Order established the following goals: GHG emissions should be reduced to 2000 levels by 2010; GHG emissions

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should be reduced to 1990 levels by 2020; and GHG emissions should be reduced to 80% below 1990 levels by 2050. CalEPA Secretary is required to coordinate efforts of various agencies to collectively and efficiently reduce GHGs. The Climate Action Team is responsible for implementing global warming emissions reduction programs. Representatives from several state agencies comprise the Climate Action Team. The Climate Action Team fulfilled its report requirements through the March 2006 Climate Action Team Report to the governor and the legislature (CAT 2006). A second draft biennial report was released in April 2009.

The 2009 Draft Climate Action Team Report (CAT 2009) expands on the policy outlined in the 2006 assessment. The 2009 report provides new information and scientific findings regarding the development of new climate and sea-level projections using new information and tools that have recently become available and evaluates climate change within the context of broader soil changes, such as land use changes and demographics. The 2009 report also identifies the need for additional research in several different aspects that affect climate change in order to support effective climate change strategies. The aspects of climate change determined to require future research include vehicle and fuel technologies, land use and smart growth, electricity and natural gas, energy efficiency, renewable energy and reduced carbon energy sources, low GHG technologies for other sectors, carbon sequestration, terrestrial sequestration, geologic sequestration, economic impacts and considerations, social science, and environmental justice.

**AB 32.** In furtherance of the goals established in Executive Order S-3-05, the legislature enacted AB 32 (Núñez and Pavley), the California Global Warming Solutions Act of 2006, which Governor Schwarzenegger signed on September 27, 2006. The GHG emissions limit is equivalent to the 1990 levels, which are to be achieved by 2020.

CARB has been assigned to carry out and develop the programs and requirements necessary to achieve the goals of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions. This program will be used to monitor and enforce compliance with the established standards. CARB is also required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 allows CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

The first action under AB 32 resulted in the adoption of a report listing early action GHG emission reduction measures on June 21, 2007. The early actions include three specific GHG control rules. On October 25, 2007, CARB approved an additional six early action GHG reduction measures under AB 32. The three original early-action regulations meeting the narrow legal definition of “discrete early action GHG reduction measures” include:

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1. A low-carbon fuel standard to reduce the “carbon intensity” of California fuels
2. Reduction of refrigerant losses from motor vehicle air conditioning system maintenance to restrict the sale of “do-it-yourself” automotive refrigerants
3. Increased methane capture from landfills to require broader use of state-of-the-art methane capture technologies.

The additional six early-action regulations, which were also considered “discrete early action GHG reduction measures,” consist of:

1. Reduction of aerodynamic drag, and thereby fuel consumption, from existing trucks and trailers through retrofit technology
2. Reduction of auxiliary engine emissions of docked ships by requiring port electrification
3. Reduction of PFCs from the semiconductor industry
4. Reduction of propellants in consumer products (e.g., aerosols, tire inflators, and dust removal products)
5. Requirements that all tune-up, smog check and oil change mechanics ensure proper tire inflation as part of overall service in order to maintain fuel efficiency
6. Restriction on the use of SF<sub>6</sub> from non-electricity sectors if viable alternatives are available.

As required under AB 32, on December 6, 2007, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was set at 427 million metric tons CO<sub>2</sub>E. In addition to the 1990 emissions inventory, CARB also adopted regulations requiring mandatory reporting of GHGs for large facilities that account for 94% of GHG emissions from industrial and commercial stationary sources in California. About 800 separate sources fall under the new reporting rules and include electricity generating facilities, electricity retail providers and power marketers, oil refineries, hydrogen plants, cement plants, cogeneration facilities, and other industrial sources that emit CO<sub>2</sub> in excess of specified thresholds.

On December 11, 2008, CARB approved the Climate Change Proposed Scoping Plan: A Framework for Change (Scoping Plan; CARB 2008) to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program.

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The key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards
- Achieving a statewide renewables energy mix of 33%
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long term commitment to AB 32 implementation.

**SB 1368.** In September 2006, Governor Schwarzenegger signed SB 1368, which requires the California Energy Commission (CEC) to develop and adopt regulations for GHG emissions performance standards for the long-term procurement of electricity by local publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission (CPUC). This effort will help protect energy customers from financial risks associated with investments in carbon-intensive generation by allowing new capital investments in power plants whose GHG emissions are as low or lower than new combined-cycle natural gas plants, by requiring imported electricity to meet GHG performance standards in California, and by requiring that the standards be developed and adopted in a public process.

**SB 97.** In August 2007, the legislature enacted SB 97 (Dutton), which directs the Governor's Office of Planning and Research (OPR) to develop guidelines under the California Environmental Quality Act (CEQA) for the mitigation of GHG emissions. OPR was to develop proposed guidelines by July 1, 2009, and the Natural Resources Agency was directed to adopt the guidelines by January 1, 2010.

On June 19, 2008, OPR issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents (OPR 2008). The advisory indicated that a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities, should be identified and estimated. The advisory further recommended that the lead agency determine significance of the impacts and impose all mitigation measures that are necessary to reduce GHG emissions to a level that is less than significant.

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The Natural Resources Agency adopted the CEQA Guidelines Amendments on December 30, 2009. The amendments became effective on March 18, 2010. The amended guidelines establish several new CEQA requirements concerning the analysis of GHGs, including the following:

- Requiring a lead agency to “make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project” (Section 15064(a))
- Providing a lead agency with the discretion to determine whether to use quantitative or qualitative analysis or performance standards to determine the significance of GHG emissions resulting from a particular project (Section 15064.4(a))
- Requiring a lead agency to consider the following factors when assessing the significant impacts from greenhouse gas emissions on the environment:
  - The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
  - Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
  - The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. (Section 15064.4(b))
- Allowing lead agencies to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures, including offsets that are not otherwise required (Section 15126.4(c)).

The amended guidelines also establish two new guidance questions regarding GHG emissions in the Environmental Checklist set forth in CEQA Guidelines Appendix G:

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The adopted amendments do not establish a GHG emission threshold, and instead allow a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by

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other agencies or experts.<sup>2</sup> The Natural Resources Agency also acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions.<sup>3</sup>

**Executive Order S-14-08.** On November 17, 2008, Governor Schwarzenegger issued Executive Order S-14-08. This Executive Order focuses on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. The governor's order requires that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. Furthermore, the order directs state agencies to take appropriate actions to facilitate reaching this target. The Resources Agency, through collaboration with the CEC and California Department of Fish and [Game-Wildlife](#) (CDFWG), is directed to lead this effort. Pursuant to a Memorandum of Understanding between the CEC and CDFWG creating the Renewable Energy Action Team, these agencies will create a "one-stop" process for permitting renewable energy power plants.

**SB XI 2.** On April 12, 2011, Governor Jerry Brown signed SB XI 2 in the First Extraordinary Session, which would expand the RPS by establishing a goal of 20% of the total electricity sold to retail customers in California per year, by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current and that meets other specified requirements with respect to its location. In addition to the retail sellers covered by SB 107, SB XI 2 adds local publicly owned electric utilities to the RPS. By January 1, 2012, the CPUC is required to establish the quantity of electricity products from eligible renewable energy resources to be procured by retail sellers in order to achieve targets of 20% by December 31, 2013; 25% by December 31, 2016; and 33% by December 31, 2020. The statute also requires that the governing boards for local publicly owned electric utilities establish the same targets, and the governing boards would be responsible for ensuring compliance with these targets. The CPUC

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<sup>2</sup> "The CEQA Guidelines do not establish thresholds of significance for other potential environmental impacts, and SB 97 did not authorize the development of a statement threshold as part of this CEQA Guidelines update. Rather, the proposed amendments recognize a lead agency's existing authority to develop, adopt and apply their own thresholds of significance or those developed by other agencies or experts" (California Natural Resources Agency 2009, p. 84).

<sup>3</sup> "A project's compliance with regulations or requirements implementing AB 32 or other laws and policies is not irrelevant. Section 15064.4(b)(3) would allow a lead agency to consider compliance with requirements and regulations in the determination of significance of a project's greenhouse gas emissions" (California Natural Resources Agency 2009, p. 100).

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will be responsible for enforcement of the RPS for retail sellers, while the CEC and CARB will enforce the requirements for local publicly owned electric utilities.

### 2.5.3 County of San Diego

#### County of San Diego Climate Action Plan

The County of San Diego Climate Action Plan (CAP), adopted June 2012, documents the County’s long-term strategy for addressing the adverse effects of climate change (County of San Diego 2012). The CAP outlines various mechanisms and measures for reducing GHG emissions at the County level, including those specific to water conservation, waste reduction, land use, and adaptation strategies to fulfill the obligations delineated in AB 32. The CAP includes County goals previously established under the County General Plan and County Strategic Energy Plan, and establishes reduction targets at 15% below 2005 levels by 2020 and 49% below 2005 levels by 2035. The CAP builds on long-standing efforts, including state initiatives, County staff recommendations, and regional planning strategies to enhance environmental sustainability and carbon neutrality, particularly unincorporated segments of the County. As shown in Table 2, GHG Sources in San Diego County, unincorporated San Diego County emitted approximately 4.51 MMT CO<sub>2</sub>E of GHGs in 2005. Similar to the statewide emissions inventory, the transportation sector was the largest contributor to GHG emissions in 2005 accounting for approximately 59% of total GHG emissions (more than 2.6 MMT CO<sub>2</sub>E). Emission sources and emission estimates by sector are shown in Table 2.

**Table 2  
GHG Sources in San Diego County**

Source Category	Annual GHG Emissions (MMT CO <sub>2</sub> E)	% of Total
Transportation	2.64	59%
Agriculture	0.19	4%
Solid Waste	0.14	3%
Wastewater	0.05	1%
Potable Water	0.24	5%
Other	0.13	3%
Energy	1.12	25%
<b>Totals</b>	<b>4.51</b>	<b>100.00%</b>

Source: County of San Diego 2012.

#### San Diego County Greenhouse Gas Inventory

The University of San Diego School of Law’s Energy Policy Initiative Center (University of San Diego 2008) prepared a regional GHG inventory. This San Diego County Greenhouse Gas Inventory (SDCGHGI) consisted of a detailed inventory that took into account the unique characteristics of the

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region in calculating emissions. The study found that emissions of GHGs must be reduced by 33% below business as usual in order for San Diego County to achieve 1990 emission levels by 2020.

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## 3.0 SIGNIFICANCE CRITERIA AND ANALYSIS METHODOLOGIES

### 3.1 State of California

The State of California has developed guidelines to address the significance of climate change impacts based on Appendix G of the CEQA Guidelines, which provides guidance that a project would have a significant environmental impact if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Neither the State of California nor the [San Diego County Air Pollution Control District \(SDAPCD\)](#) has adopted emission-based thresholds for GHG emissions under CEQA. OPR's Technical Advisory titled *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review* states that "public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact" (OPR 2008, p. 4). Furthermore, the advisory document indicates in the third bullet item on page 6 that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice."

### 3.2 County Climate Change Analysis Screening Criteria

As indicated in the County's *DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otay Mesa Specific Plan* (County of San Diego 2010a), any commercial or light industrial use that exceeds a screening criteria threshold of 900 metric tons of carbon dioxide equivalent (CO<sub>2</sub>E)<sup>4</sup> per year would be required to prepare a Climate Change analysis. The 900-metric-ton threshold for determining when a more detailed climate change analysis is required was chosen based on available guidance from the California Air Pollution Control Officers

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<sup>4</sup> The CO<sub>2</sub> equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, such that metric tons CO<sub>2</sub>E = (metric tons of a GHG) x (GWP of the GHG). For example, the GWP for CH<sub>4</sub> is 21. This means that emissions of 1 metric ton of methane are equivalent to emissions of 21 metric tons of CO<sub>2</sub>.

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Association (CAPCOA) white paper on addressing GHG emissions under CEQA (CAPCOA 2008). The CAPCOA white paper references a 900-metric-ton guideline as a conservative threshold for requiring further analysis and mitigation. Table 3, Project Size Thresholds, shows the general sizes of projects that would generally require a more detailed climate change analysis based on the 900-metric-ton threshold.

**Table 3**  
**Project Size Thresholds**

Project Type	Size
Single-Family Residential	50 units
Apartments / Condominiums	70 units
General Commercial Office Space	35,000 square feet
Retail Space	11,000 square feet
Supermarket / Grocery Space	6,300 square feet

Source: County of San Diego DPLU 2010

If a project meets the above size criteria or does not exceed 900 metric tons CO<sub>2</sub>e per year, then the climate change impacts would be considered less than significant.

For project's whose emissions exceed the screening threshold, the project needs to demonstrate that it would reduce overall GHG emissions to 33% below business as usual. The 33% reductions should be an overall reduction for operational emissions, construction-related emissions, and vehicular-related GHG emissions (County of San Diego 2010a). Construction emissions are to be amortized over a project life of 30 years and added to the operational emissions. Business as usual is defined as the emissions that would be generated prior to AB 32 related emission restrictions.

This approach ensures that new development with the potential to make cumulatively considerable contributions to climate change will incorporate appropriate mitigation measures and not result in a conflict with the goals of AB 32.

# Greenhouse Gas Analysis Technical Report for the Tierra del Sol Solar Farm Project

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## 4.0 PROJECT IMPACT ANALYSIS

The significance criteria described in Section 3.0 were used to evaluate impacts associated with the construction and operation of the proposed project.

### 4.1 Significance of Impacts Prior to Mitigation

The project proponent has stated that the project is scheduled to commence construction in ~~August 2013~~ April 2014 and would be completed within approximately 1 year for both Phase I and Phase II. Construction phases and associated durations were provided by the project proponent and include the following subphases:

- Site demolition and clearing, grubbing, grinding, and road construction (10 weeks)
- Underground electric/communications cable installation (17 weeks)
- Tracker installation – 45 MW (20 weeks)
- Tracker installation – 15 MW (7 weeks)
- Substation construction (~~23~~17 weeks)
- Operations and maintenance building construction (~~4~~13 weeks)
- Gen-tie (~~23-10~~ weeks, commencing following-prior to site demolition/clearing/grubbing/grinding/road construction).

Project completion is anticipated in ~~August 2014~~ April 2015, although construction of Phase II could be completed at a later date. Details of the construction schedule including heavy construction equipment hours of operation and duration, worker trips, and equipment mix are included in Appendix A.

The equipment mix anticipated for construction activity was based on information provided by the applicant and best engineering judgment. The equipment mix is meant to represent a reasonably conservative estimate of construction activity.

Operation of the project would involve in-place tracker washing that would occur every 6 to 8 weeks by mobile crews who will also be available for dispatch whenever on-site repairs or other maintenance are required. Tracker washing will be undertaken using a tanker truck and smaller “satellite” tracker washing trucks. On-site water storage tanks may be installed to facilitate washing. A 4-acre ~~operations and maintenance (O&M)~~ annex site would be located adjacent to

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the substation site and would house operations and maintenance supplies, telecommunications equipment and rest facilities all within a single-story building.

Maintenance and repair activities for transmission facilities would include both routine preventive maintenance and emergency procedures conducted to maintain system integrity, as well as vegetation clearing. Activities anticipated to occur are described in more detail below.

*Pole or Structure Brushing.* Certain poles or structures would require the removal of vegetation to increase aerial patrol effectiveness or to reduce fire danger. Vegetation would be removed using mechanical equipment, such as chainsaws, weed trimmers, rakes, shovels, and brush hooks. A crew of three workers would typically conduct this work. A 100-foot-diameter area around each transmission structure would be required. Poles are typically inspected on an annual basis to determine if vegetation removal around poles is required.

*Application of Herbicides.* To prevent vegetation from reoccurring around structures, Soitec may use herbicides in accordance with SDG&E's Herbicides and Application Procedures. The utility SDG&E normally utilizes one or more of 16 herbicides. These herbicides are identified in a U.S. Fish and Wildlife Service (USFWS) letter to SDG&E, along with their recommendations. The application of herbicides generally requires one person and takes only minutes to spray around the base of the pole within a radius of approximately 10 feet. The employee would either walk from the nearest access road to apply the herbicide or drive a pick-up truck directly to each pole location as access permits.

*Equipment Repair and Replacement.* Poles or structures support a variety of equipment, such as conductors, insulators, switches, transformers, lightning arrest devices, line junctions, and other electrical equipment. In order to maintain uniform, adequate, safe, and reliable service, electrical equipment may need to be added, repaired, or replaced during operations. An existing transmission structure may be removed and replaced with a larger/stronger structure at the same location or a nearby location, due to damage or changes in conductor size. Equipment repair or replacement generally requires a crew to gain access to the location of the equipment to be repaired or replaced. The crew normally consists of four people with two to three trucks, a boom or line truck, an aerial-lift truck, and an assist truck. If no vehicle access exists, the crew and material are flown in by helicopter.

*Insulator Washing.* The 138 kV transmission line would use polymer insulators that do not require washing.

*Use of Helicopters.* Each electric transmission line is inspected several times a year via helicopter. Helicopters may also be used to deliver equipment, position poles and structures, string lines, and position aerial markers, as required by Federal Aviation Administration regulations.

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## 4.2 Construction GHG Emissions

GHG emissions would be associated with the construction phase of the proposed project (solar farm and gen-tie line) through use of construction equipment and vehicle trips. Emissions of CO<sub>2</sub> from off-road equipment used the construction phase of the project were estimated using emission rates derived using CARB's offroad equipment model, OFFROAD2007, available online (<http://www.arb.ca.gov/msei/offroad/offroad.htm>). Emissions of all pollutants from on-road trucks and passenger vehicles were estimated using emission factors derived using CARB's motor vehicle emission inventory program, EMFAC2011, available online (<http://www.arb.ca.gov/msei/modeling.htm>).

Vehicle miles traveled (VMT) for paved road travel by workers are based on ~~default value (16.8 miles one-way) from the URBEMIS 2007, Version 9.2.4, land use and air emission model (Jones & Stokes 2007)~~a 35-mile commute distance from Alpine, El Centro, and surrounding areas<sup>5</sup>, and equipment delivery truck VMT are based on 85-mile one-way routes from Rancho Bernardo where equipment deliveries would originate.<sup>6</sup>

The results were adjusted to estimate CH<sub>4</sub> and N<sub>2</sub>O emissions in addition to CO<sub>2</sub>. The CO<sub>2</sub> emissions from off-road equipment and vehicles and delivery trucks, which are assumed to be diesel fueled, were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for diesel fuel as reported in the California Climate Action Registry's (CCAR) General Reporting Protocol for transportation fuels and the global warming potential for each GHG (CCAR 2009). The CO<sub>2</sub> emissions associated with construction worker trips were multiplied by a factor based on the assumption that CO<sub>2</sub> represents 95% of the CO<sub>2</sub>E emissions associated with passenger vehicles (EPA 2005). The results were then converted from annual tons per year to metric tons per year. Table 4, Estimated Construction GHG Emissions, shows the estimated annual GHG construction emissions associated with the proposed project, as well as the 30-year amortized construction emissions.

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<sup>5</sup> [The average of the distances from Alpine and El Centro is 46 miles. This distance was reduced by 25% to reflect worker commute trips from local housing \(temporary or permanent\) for an average worker commute distance of 35 miles.](#)

<sup>6</sup> [VMT = one-way miles × 2 × number of trips](#)

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**Table 4**  
**Estimated Construction GHG Emissions (metric tons/year)**

Construction Year	CO <sub>2</sub> E Emissions
<a href="#">20132014</a>	<a href="#">1,267.702,783.86</a>
<a href="#">20142015</a>	<a href="#">1,395.49626.98</a>
30-year amortized emissions	<a href="#">88.77113.69</a>

Source: OFFROAD2007, EMFAC 2011. See Appendix A for complete results.

## 4.3 Operational GHG Emissions

The following section discusses the calculations of GHG emissions resulting from the primary sources of GHGs associated with the operation of the proposed project. Operation of the project would produce GHG emissions associated with worker vehicles, personnel transport vehicles, washing vehicles (heavy-duty diesel water trucks), [satellite washing vehicles \(light-duty diesel trucks\)](#), service trucks, ~~helicopters~~, emergency generators, electricity consumption, and water supply during operation and maintenance for the solar project. [Operation of the gen-tie would include pole/structure brushing, herbicide application, equipment repair using heavy-duty diesel trucks and light-duty diesel trucks, and biannual helicopter inspections.](#) GHG emissions from natural gas use and creation of solid waste are not associated with the proposed project. At the present time, [specific substation devices, such as transformers and circuit breakers, have not been identified; however,](#) the substation is not expected to include any equipment that uses ~~sulfur hexafluoride~~ [SF<sub>6</sub>](#), which is a GHG associated with high-voltage switching devices at some substations. [Should substation devices contain SF<sub>6</sub>, SDG&E has implemented maintenance and repair practices that have resulted in a system-wide average leakage rate of 0.29%, which would minimize SF<sub>6</sub> emissions. It is anticipated that the project proponent would employ similar practices.](#)

### 4.3.1 Motor Vehicles

The proposed project would impact air quality through the vehicular traffic generated by operations and maintenance vehicles including worker vehicles, on-site personnel transport vehicles, washing vehicles and a service truck. Worker trip distances for operation and maintenance of the solar farm were conservatively estimated for the model inputs as originating in Alpine, [El Centro, and surrounding areas](#) (approximately 35 miles one-way [as discussed in Section 4.2](#)). All other operation and maintenance vehicles were assumed to be staged at a location near the project site, resulting in an estimated 10 miles per day of maintenance activities per vehicle. Maintenance vehicles associated with the gen-tie line were assumed to originate in Alpine plus the length of the gen-tie line (6 miles) for a total of 41 miles one-way. Maintenance activities for the gen-tie line were assumed to occur twice a month, and periodic repair activities were assumed to occur one week (5 days) per year.

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Annual CO<sub>2</sub> emissions from motor vehicle trips associated with the proposed project were quantified using EMFAC2011. The CO<sub>2</sub> emissions from diesel-fueled washing vehicles were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for diesel fuel as reported in the CCAR's General Reporting Protocol for transportation fuels and the global warming potential for each GHG (CCAR 2009). CH<sub>4</sub> and N<sub>2</sub>O emissions from all other motor vehicles during operation of the project were accounted for by multiplying the estimated CO<sub>2</sub> emissions by a factor based on the assumption that CO<sub>2</sub> represents 95% of the CO<sub>2</sub>E emissions associated with passenger vehicles (EPA 2005). As summarized in Table 5, Estimated Operational GHG Emissions, total annual operational GHG emissions from motor vehicles would be 111.34279.29 metric tons CO<sub>2</sub>E per year. Additional detail regarding these calculations can be found in Appendix A.

### 4.3.2 Helicopters

Helicopters would be used for surveillance and inspection of the gen-tie line. To best represent helicopter emissions during maintenance and inspection activities, a [Robinson-44Bell 206](#) helicopter was used for the purposes of calculating annual CO<sub>2</sub> emissions. Annual CO<sub>2</sub> emissions from helicopter use were calculated based on fuel consumption of a [Robinson-44Bell 206](#) model aircraft and the CO<sub>2</sub> emission factor for aviation gasoline as reported in the [California Climate Action Registry's \(CCAR's\) General Reporting Protocol](#) for transportation fuels (CCAR 2009). The GHG emissions estimate is based on two inspections of the gen-tie line, each lasting approximately 8 hours. The CO<sub>2</sub> emissions from use of helicopters were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for aviation gasoline as reported in the [California Climate Action Registry's \(CCAR's\) General Reporting Protocol](#) for transportation fuels and the global warming potential for each GHG (CCAR 2009).

### 4.3.3 Diesel Generators

Operational emissions would result from intermittent use of two 680\_-kW diesel-powered emergency generators for maintenance and testing purposes. Each generator would be run for testing and maintenance approximately one hour each week for a total of 50 hours per year. Generator engines would meet the EPA standards for Tier 2 engines as required by the CARB Airborne Toxic Control Measure for new and in-use stationary diesel engines. The CO<sub>2</sub> emission factor was obtained from Section 3.4 (Large Stationary Diesel and All Stationary Dual-fuel Engines) of the EPA's *Compilation of Air Pollutant Emission Factors* (EPA 1996). The CO<sub>2</sub> emissions from diesel combustion were adjusted by a factor derived from the relative CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for natural gas as reported in the CCAR's *General Reporting Protocol* (CCAR 2009) for stationary combustion fuels and their GWPs. The estimated emissions from the emergency generator engines are shown in Table 5. Refer to Appendix A for additional information.

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## 4.3.4 Electrical Generation

Annual electricity use for the proposed O&M annex was based upon estimated generation rates for land uses in the [SDG&E San Diego Gas & Electric](#) service area (see Appendix A). In addition, the trackers (e.g., control units, motors) and other devices (e.g., inverters, field communications) common to each building block of trackers would use electricity to be provided by [SDG&E San Diego Gas & Electric](#) (see Appendix A). The project proponent provided the estimated ratings of the devices and their operating schedule. Annual usage was determined depending on the period that devices would operate (e.g., daylight hours only). The generation of electricity through combustion of fossil fuels typically results in emissions of CO<sub>2</sub> and to a smaller extent CH<sub>4</sub> and N<sub>2</sub>O. Annual electricity emissions were estimated using the reported CO<sub>2</sub> emissions per kilowatt-hour for [SDG&E San Diego Gas & Electric](#) (SDG&E 2010), which would provide electricity for the project, adjusted to reflect 33% renewable energy in 2020. The contributions of CH<sub>4</sub> and N<sub>2</sub>O for powerplants in California were obtained from the CCAR's General Reporting Protocol (CCAR 2009), which were adjusted for their GWPs. The proposed project would consume an estimated ~~1,050,095,306~~ ~~859~~ kilowatt-hours per year, generating approximately ~~263.6~~ ~~275.04~~ metric tons CO<sub>2</sub>E annually as shown in Table 5 (see Appendix A for complete results).

## 4.3.5 Water Supply [and Wastewater](#)

Water supplied to the proposed project would be obtained from an on-site well, which would require the use of electricity. Annual water use for the proposed project for the O&M annex and washing the CPV trackers was based upon information provided by the project proponent and would result in a water consumption rate of approximately 3.68 acre-feet per year. The estimated electrical usage associated with water supply was obtained from a CEC report on electricity associated with water supply in California (CEC 2006). An electricity usage factor representing supply and conveyance of locally supplied water in Northern California was assumed to be applicable (the factor for Southern California water assumes that water would be provided from the State Water Project, which is not the case for this project). GHG emissions from electrical generation were calculated as described in Section 4.3.3. As shown in Table 5, annual water use would result in approximately 1.96 metric tons CO<sub>2</sub>E per year (see Appendix A).

~~[GHG emissions associated with wastewater-related electricity consumption treatment using a septic tank were estimated based on data provided in the \*County of San Diego Design Manual for Onsite Wastewater Treatment Systems\* \(County of San Diego 2010b\) and a CH<sub>4</sub> emission factor derived from \*CalEEMod User's Guide\* \(Environ 2011\). Estimated annual wastewater treatment would result in approximately 0.09 metric tons CO<sub>2</sub>E per year \(see Appendix A\).](#)~~

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## 4.3.6 Summary of GHG Emissions

As shown in Table 5, total annual GHG emissions from construction and operation of the proposed project would be approximately ~~505~~ 556.63 metric tons CO<sub>2</sub>E per year.

**Table 5**  
**Estimated Operational GHG Emissions (metric tons/year)**

Source	CO <sub>2</sub> E Emissions
Motor Vehicles	<del>97.65</del> <u>111.34</u>
Helicopters	<del>2.04</del> <u>3.53</u>
Emergency Generators	50.97
Electrical Generation	<del>263.64</del> <u>275.04</u>
Water Supply	1.96
<u>Wastewater</u>	<u>0.09</u>
30-year amortized construction emissions	<del>88.77</del> <u>113.69</u>
<b>Total</b>	<del>505.00</del> <u>556.63</u>

Source: EMFAC2011; CCAR 2009; EPA 2005; CEC 2006 . See Appendix A for complete results.

Because the total project GHG emissions would not exceed the County’s screening threshold of 900 metric tons CO<sub>2</sub>E, the impact would be less than significant.

## 4.4 Project Design Features and Mitigation Measures

No mitigation measures would be required.

## 4.5 GHG Emission Benefits

In keeping with the renewable ~~energy~~ energy target under the Scoping Plan and as required by SB X1 2, the proposed project would provide a source of renewable energy to ~~assist~~ SDG&ESan Diego Gas & Electric achieve the Renewable Portfolio Standard of 33% by 2020. Renewable energy, in turn, potentially offsets GHG emissions generated by fossil-fuel power plants. ~~In 2010, 60% and 4% of SDG&ESan Diego Gas & Electric’s portfolio were generated from natural gas and coal, respectively (SDG&E n.d.).~~ Based on estimates by the project proponent, the project would generate 2,083 kilowatt-hours alternating current annually per installed kilowatt (based on the direct current capacity of the CPV trackers). This factor reflects the available daylight hours, conversion of direct current to alternating current, and various system losses. Using the installed CPV capacity of 80 MW (80,000 kilowatts~~kW~~) direct current, the project is anticipated to generate 166,640,000 kilowatts~~kW~~ per year. A GHG factor for fossil-fuel-generated electricity was developed ~~Based on reported CO<sub>2</sub> emissions per kilowatt-hour for SDG&ESan Diego Gas & Electric in 2008 (SDG&E 2010); and an adjustment to reflect electricity~~

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from renewable energy, large hydroelectric, and nuclear sources in 2009 (SDG&E n.d.), which do not generate GHG emissions. ~~The potential CO<sub>2</sub> reduction factor for fossil-fuel-generated electricity~~ would be 1.071 pounds CO<sub>2</sub> per kilowatt-hour. The contributions of CH<sub>4</sub> and N<sub>2</sub>O for powerplants in California were obtained from the CCAR's *General Reporting Protocol* (CCAR 2009), which were adjusted for their GWPs. Thus, the proposed project would provide a potential reduction of 81,334 metric tons CO<sub>2</sub>E per year if the electricity generated by the proposed ~~product project~~ were to be used instead of electricity generated by fossil-fuel sources. ~~Additional detail regarding these calculations can be found in Appendix A.~~ After accounting for the amortized construction and annual operational emissions of ~~745-557~~ metric tons CO<sub>2</sub>E per year, the net reduction in GHG emissions would be 80,829,777 metric tons CO<sub>2</sub>E ~~per year~~. This reduction is not considered in the significance determination of the proposed project's GHG emissions but is provided for disclosure purposes.

### 4.6 Conclusion

The proposed project's potential effect on global climate change was evaluated, and GHG emissions were estimated. The project is estimated to result in construction and operational GHG emissions of approximately ~~505-557~~ metric tons CO<sub>2</sub>E. As such, the proposed project would not exceed the 900-metric-ton threshold as described in the *DPLU Interim Guidance for Greenhouse Gas Analysis – Industrial Use/East Otoy Mesa Specific Plan*, and it is therefore not likely to impede the implementation of AB 32. The project would therefore have a less-than-significant impact on climate change.

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## 6.0 LIST OF PREPARERS

David Deckman	Director of Air Quality Services
Jennifer Longabaugh	Environmental Planner
Hannah Westwood	Publications Services

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APPENDIX A  
*Greenhouse Gas Emission Calculations*

