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February 20, 2013

Mr. Steve Wragg  
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**SUBJECT: Desert Green Photovoltaic Solar Farm Air Quality Conformance – County of San Diego, CA; Modification to MUP 09-012 (APN 141-230-26); ER. No. 09-05-001A**

Ldn Consulting have examined the proposed changes to the Desert Green Photovoltaic Solar Farm Project at your request. Desert Green Solar Farm LLC is requesting a MUP modification to previously-approved MUP P09-12 on the 288-acre parcel. The previously-approved project included the 288-acre parcel and the 104-acre parcel located directly adjacent to the south (APN 141-230-33; P09-14). The proposed Desert Green Solar Farm does not include the 104-acre parcel (P09-014) as part of the Project, and is instead limited to development of the 288-acre parcel and additional lands for access/utility easement purposes. The Project would involve the construction of an approximately 45-acre solar energy electrical generation facility to provide electricity for public consumption. The proposed facilities would have an overall capacity of approximately 6.5 megawatts (MW), serving the Borrego Valley area. Of the 288 acres, the proposed development area where the trackers would be installed, the underground portion of the 12kV Gen-tie line/access route, and the temporary construction laydown area would total 50.63 acres. An additional 2.61 acres on the 288-acre parcel would be affected to allow for a 15-foot wide trail easement along the northern and western property boundaries (no improvements proposed at this time); however, the trail easement is not included as part of the Major Use Permit boundary. Additionally, 124.68 (or approximately 125) acres of the 288-acre parcel would be dedicated as undisturbed onsite open space for biological mitigation purposes (to remain unfenced with intermittent small-scale signage installed along the perimeter). The remainder of the parcel (approximately 110 acres) would remain undeveloped and in its current natural state (unfenced). The new site plan is shown on Figure 1.

Overall, the proposed Project is a reduction in size to the originally approved Borrego Photovoltaic Solar Farm project. The operations and construction activities will be very similar in nature if not reduced. The Project's grading operations will be reduced and the concentrated photovoltaic (CPV) installation will require less time than the originally proposed PV panels. This is due to the size of the newly proposed CPV units requiring the installation of fewer units. The equipment that will operate on a daily basis will remain the same and therefore the air quality emissions during construction and CPV installation would be the same if not lower than the originally approved project air quality assessment, which had no impacts from an air quality standpoint (Source: Focused Air Quality Assessment Borrego Photovoltaic Solar Farm, Ldn Consulting 12-13-10).



Operationally, the Project has agreed as part of the design that all disturbed areas would be covered with gravel or a permeable soil binding agent to reduce dust once the project is constructed and operational. In order to control dust during the life of the project, a non-toxic, biodegradable agent or permeable rock material will be applied to all exposed surface areas. The binding agents would be suitable for both traffic and non-traffic areas. Permeable binding agents require a single initial application and periodic maintenance every 2-3 years. This is consistent with the original findings in the Project's approved focused air quality assessment and mitigated negative declaration (MND).

The proposed project modification is consistent with the features and findings identified in the original Project's Focused Air Quality Assessment prepared by Ldn Consulting dated December 13, 2010. A summary of the construction emissions from the original analysis is shown in Table 1 below.

**Table 1: Expected Construction Emissions Summary**

Year	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub> (Dust)	PM <sub>10</sub> (Exhaust)	PM <sub>10</sub> (Total)	PM <sub>2.5</sub> (Dust)	PM <sub>2.5</sub> (Exhaust)	PM <sub>2.5</sub> (Total)
2010 (lb/day) Unmitigated	14.28	116.17	63.12	0	145.02	5.99	151.01	30.29	5.51	35.80
<b>Significance Threshold (lb/day)</b>	75	250	550	250	-	-	100	-	-	55
<b>SDAPCD Impact?</b>	No	No	No	No	-	-	Yes	-	-	Yes
2010(lb/day) Mitigated	14.28	116.17	63.12	0	62.8	5.99	68.79	13.12	5.51	18.63
<b>Significance Threshold (lb/day)</b>	75	250	550	250	-	-	100	-	-	55
<b>SDAPCD Impact?</b>	No	No	No	No	-	-	No	-	-	No
2011 (lb/day) Unmitigated	13.22	102.2	46.27	0	0.01	5.20	5.21	0	4.78	4.78
<b>Significance Threshold (lb/day)</b>	75	250	550	250	-	-	100	-	-	55
<b>SDAPCD Impact?</b>	No	No	No	No	-	-	No	-	-	No
2011 (lb/day) Mitigated	13.22	102.2	46.27	0	0.01	5.20	5.21	0	4.78	4.78
<b>Significance Threshold (lb/day)</b>	75	250	550	250	-	-	100	-	-	55
<b>SDAPCD Impact Unmitigated?</b>	No	No	No	No	-	-	Yes	-	-	No
<b>SDAPCD Impact Mitigated?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	-	-	<b>No</b>	-	-	<b>No</b>

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It was found that the following mitigation measures would be required to reduce PM10 impacts to a level below significance:

1. *Apply water during grading/grubbing activities to all active disturbed areas at least twice daily.*
2. *Apply water to all onsite roadways at least three times daily or use of magnesium chloride or other County approved dust suppression additives and apply water one-time daily.*
3. *Reduce all construction related traffic speeds onsite to below 15 Miles per Hour (MPH).*

The above mitigation recommendations were based on control efficiencies established by SCAQMD CEQA air quality handbook and recommended within the URBEMIS 2007 air quality model. The CEQA handbook states that watering twice daily can reduce PM10 from 34-68% however; an average 51% was utilized. Therefore, no additional analysis is warranted and no air quality impacts are anticipated due to the proposed modifications to the Project with the incorporation of the mitigation measures stated above.

Should you have any questions regarding the above conclusions, please do not hesitate to contact me at (760) 473-1253.

Sincerely,  
**Ldn Consulting**



Jeremy Loudon, Principal  
Ldn Consulting, Inc.