

Appendix H.2

Air Quality and Greenhouse Gas Supplemental Memorandum 2024

February 12, 2024

Chris Fahey
Starlight Solar LLC
12302 Exposition Boulevard
Los Angeles, California 90064

**Subject: Starlight Solar Project – Air Quality and Greenhouse Gas Technical Study
Memorandum – Project Design Update**

Dear Mr. Fahey:

INTRODUCTION

In November 2023, Yorke Engineering, LLC (Yorke) prepared an Air Quality and Greenhouse Gas Technical Study for the Starlight Solar Project (project) in San Diego, California. This memorandum has been prepared to provide updates to the November 2023 Starlight Solar Project Air Quality and Greenhouse Gas Technical Study due to modifications in project design. These revisions provide clarifying information but do not change the significance conclusions made in the November 2023 technical study.

AIR QUALITY AND GREENHOUSE GASES

The November 2023 Air Quality and Greenhouse Gas Technical Study construction and operation emissions associated with the project were calculated using CalEEMod version 2022.1.1.20 using the assumption that the project would be constructed in two phases across a 592-acre site. The original project included the Major Use Permit (MUP) project site of approximately 585 acres in aggregate, an off-site generation tie-line (gen-tie) area of 7 acres, and an off-site vehicle turnaround area of 0.06 acre. The project design has now been updated with a 10-acre reduction in ground disturbance for the MUP site. The project would now be constructed in two phases across the 582-acre site, which includes the MUP project site of approximately 575 acres, an off-site generation tie-line (gen-tie) area of 7 acres, and an off-site vehicle turnaround area of 0.06 acre.

The 10-acre reduction, or 1.7% less ground disturbance, would not be substantive with respect to construction emissions. CalEEMod calculates criteria pollutant and greenhouse gas (GHG) emissions from project site disturbance using assumptions for various acreage categories (size brackets). In the November 2023 Air Quality and Greenhouse Gas Technical Study, the project utilized the CalEEMod acreage category for projects between 500-600 acres, which will remain the same for the updated project design acreage. Criteria pollutant and GHG emissions will not change due to the 10-acre reduction in project size. Therefore, the analysis and less than significant determinations in the November 2023 Air Quality and Greenhouse Gas Technical Study remain representative of the Starlight Solar Project's current design.

Should you have any questions or concerns, please contact me at (805) 293-7867.

Sincerely,

Chris Fahey
February 12, 2024
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Bradford L. Boyes, BSEnvE, MBA, QEP | Ventura Office
Principal Engineer
Yorke Engineering, LLC
BBoyes@YorkeEngr.com

cc: Kara Laurenson-Wright, AICP, SWCA Environmental Consultants