

Appendix C: Air Quality and Greenhouse Gas Analysis

Air Quality Technical Report

Savira Solar Project

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Acronyms

a	empirical constant
AAM	Annual Arithmetic Mean
AAQS	Ambient Air Quality Standards
AC	alternating current
AQMP	Air Quality Management Plan
b	empirical constant
BACT	Best Available Control Technology
BESS	Battery Energy Storage System
BLM	Bureau of Land Management
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAP	Climate Action Plan
CARB	California Air Resources Board
CE	control efficiency rate
CEQA	California Environmental Quality Act
CF	capacity factor
CFR	Code of Federal Regulations
CH ₄	methane
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CO	carbon monoxide
DC	direct current
DPM	diesel particulate matter
DRECP	Desert Renewable Energy Conservation Plan
EF	size specific emission factor
EMFAC	Emissions Factor Model for Onroad Vehicles
gen-tie	generation tie lines

GHG	greenhouse gas
g/m ²	grams per square meter
GWP	global warming potential
HAP	Hazardous Air Pollutants
H ₂ S	hydrogen sulfide
HFC	hydrofluorocarbon
hp	horsepower
ICE	internal combustion engines
IPCC	Intergovernmental Panel on Climate Change
JTNP	Joshua Tree National Park
k	empirical constant
kV	kilovolt
kW	kilowatt
LF	load factor
LST	Localized Significance Thresholds
µg/m ³	micrograms per cubic meter
mg/m ³	milligrams per cubic meter
mph	miles per hour
MATES	Multiple Air Toxics Exposure Study
MDAB	Mojave Desert Air Basin
MRI	Midwest Research Institute
m/s	meters per second
MW	megawatt
MWh	megawatt hour
N	number of days
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NO ₂	nitrogen dioxide

NO _x	nitrogen oxides
O ₃	ozone
OFFROAD	Emissions Factor Model for Offroad Equipment
O&M	operation and maintenance
P	Number of days per year with >0.01 inches of rain
Pb	lead
PEIS	Programmatic Environmental Impact Statement
PM	particulate matter
PM _{2.5}	fine particulate matter less than 2.5 micrometers in diameter
PM ₁₀	respirable particulate matter less than 10 micrometers in diameter
POD	Plan of Development
ppb	parts per billion
ppm	parts per million
PV	photovoltaic
ROG	reactive organic gases
ROW	right of way
RPS	renewable portfolio standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
S	silt content
SAFE	Safer Affordable Fuel Efficient
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
sL	Surface silt loading
SO ₂	sulfur dioxide
TAC	toxic air contaminants
USEIA	United States Energy Information Administration
USEPA	United States Environmental Protection Agency

USGS	United States Geological Survey
VOC	volatile organic compounds
W	mean vehicle weight

1.0 INTRODUCTION

This document presents the results of an air quality analysis prepared for the Savira Solar Project (Proposed Action or project). This document provides an overview of the existing air quality conditions at the project site, the air quality regulatory framework, and an analysis of potential air quality impacts that would result from implementation of the project. Issues related to health impacts, odor impacts, climate change and greenhouse gas (GHG) emissions are also included. Cumulative impacts are addressed.

The detailed results, supporting information, methodology, and assumptions used in the air emissions inventory are provided within:

- **Attachment A: Emissions Inventory Supporting Information**

The Savira Solar Project will be located under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD contains two air basins; the South Coast Air Basin (SCAB), within the western portion of the SCAQMD, and the Mojave Desert Air Basin (MDAB), within the eastern portion of the SCAQMD. The project is located within the MDAB. The MDAB has federal designations of unclassifiable/attainment for all pollutants, but state nonattainment of ozone and coarse particulate matter. The Mojave Desert Air Quality Management District (MDAQMD) includes eastern Riverside County including Blythe, which is to the east of the project site.

This document has been compiled for the purpose of demonstrating compliance with the California Environmental Quality Act (CEQA).

2.0 PROJECT OVERVIEW

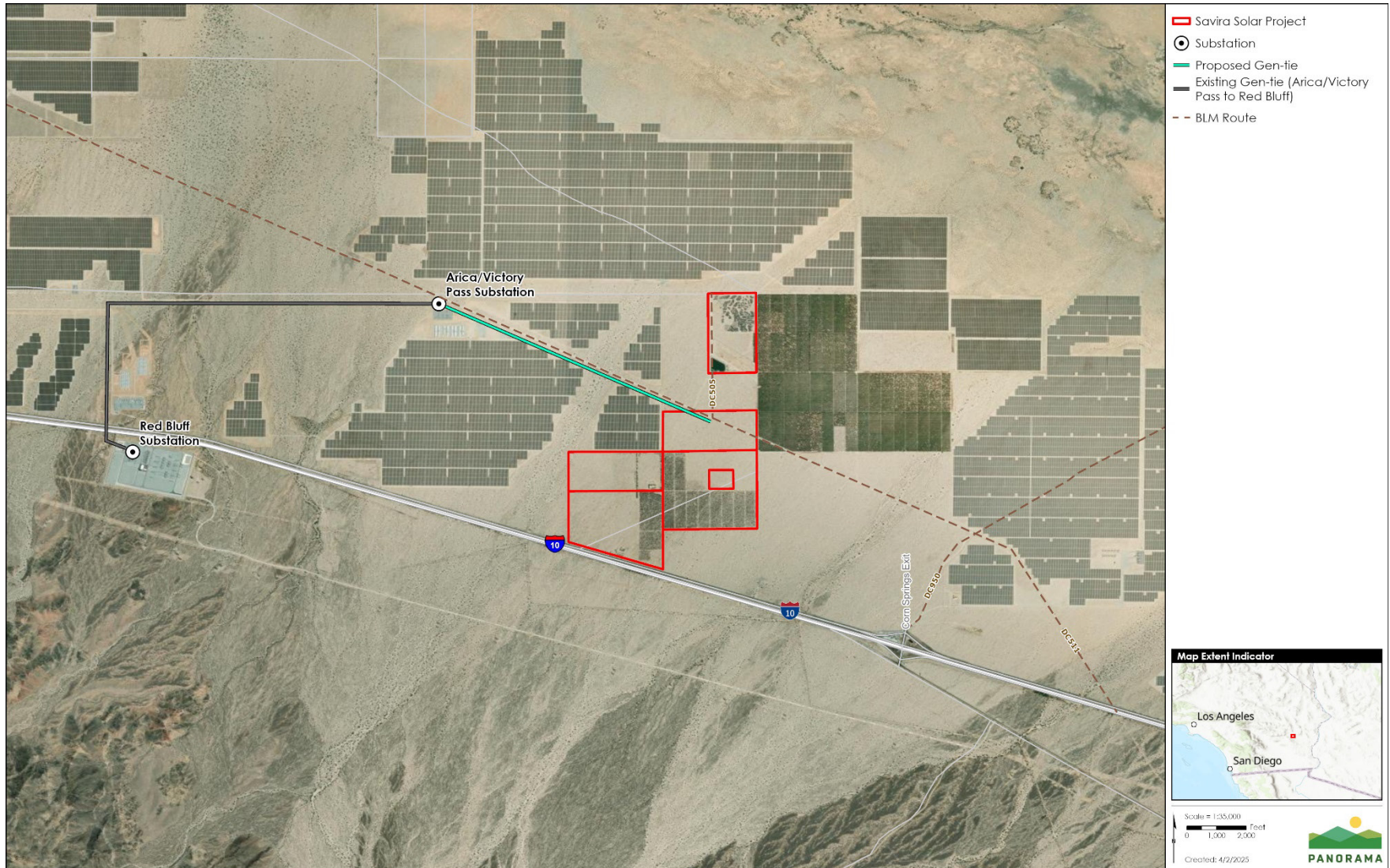
Savira Solar consists of up to a nominal 150-megawatt (MW) solar photovoltaic power generating facility and 250-megawatt battery energy storage system (BESS). The project site would include approximately 535 acres, which would be located on private land within unincorporated Riverside County, California. The surrounding area is mainly being developed or has completed development for other solar facilities except for an active date palm farm northeast/east of the project site. The project would be located approximately 8.5 miles east of the unincorporated community of Desert Center. Primary project access would be via the Corn Springs exit off I-10, north on BLM open off-highway vehicle (OHV) route DC 950, then west along BLM open route DC 511. Additional access to the northern parcel will also use BLM open route DC 505.

The solar energy generated by the project would be transmitted via a new approximately 2-mile-long, 230 kV generation interconnection tie (gen-tie) line to the existing Arica and Victory Pass substation, where it would be carried on the existing approximate 3-mile 230 kV Arica/Victory Pass gen-tie to interconnect to the regional transmission grid at the existing Southern California Edison (SCE) Red Bluff Substation south of the Interstate 10 and approximately 3.5 miles west of the site. **Figure 1: Regional Location Map for Savira Solar Project** and **Figure 2: Proposed Action for Savira Solar Project** illustrate the project location and its parcel boundaries.

Figure 1 Regional Location Map for Savira Solar Project



Figure 2 **Proposed Action for Savira Solar Project**



Construction is expected to occur from June of 2026 through August of 2027 (15 months). Construction activities would be conducted from 7 a.m. to 7 p.m. Monday through Friday. Additional hours may be necessary to make up schedule deficiencies, or to complete critical construction activities. For instance, during hot weather, it may be necessary to start work earlier (e.g., at 5:00 am) to avoid work during high ambient temperatures. Construction would require some night-time activity for installation, service or electrical connection, inspection, and testing activities.

Construction will include the major activities of pre-construction work, including site surveying and staking, geotechnical investigations and desert tortoise fencing and clearance, followed by mobilization, construction grading and site preparation, installation of drainage and erosion controls, panel/tracker assembly, solar field construction, and then testing and commissioning. Some aspects of construction may be initiated off-site including pre-fabrication activities specific to the site along with main power transformer construction that is specific to the site. Some aspects of construction will need to be coordinated with other entities, such as the commissioning of the gen-tie into the Arica/Victory Pass Substation. The project could be in operation for at least 40 years with the option of applying for renewal or repowering.

The on-site construction workforce is anticipated to be an average of 125 construction workers (with a maximum of 275 construction workers) including laborers, craftsmen, supervisory personnel, support personnel, construction management, and delivery drivers. Most construction staff and workers would commute daily to the jobsite from within Riverside and San Bernardino Counties. Construction worker vehicles and haul trucks would travel approximately 120- and 100-miles round trip, respectively; a portion of which would be along the unpaved access road.¹

Materials would be delivered to the site during construction periodically throughout the day via trucks. Material deliveries would avoid rush hour. Signage would be placed on the delivery route from the Corn Springs exit off the Interstate 10 directing delivery traffic to the proposed locations. Once delivered to the site, construction equipment would be used on site for the construction phase and transported off site when no longer needed for construction. Haul truck trips would involve a maximum of 20 per day with an average of 15 per day. Project operations would include approximately 10 employees.

3.0 ANALYSIS METHODOLOGY

Intermittent, short-term emissions that occur from construction activities were evaluated. The analysis focuses on daily and annual emissions from offroad equipment, haul trucks, and motor vehicles. The air quality analysis was developed based on the SCAQMD *Air Quality Handbook*.² The air quality analysis was conducted to determine the air quality impacts, in terms of air emissions, using the significance levels

¹ Clearway, Redonda and Savira_Private Land_Craft and Equipment Estimate, May 28, 2024 and March 11, 2025

² South Coast Air Quality Management District, CEQA Air Quality Handbook, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

identified by SCAQMD.³ Best management practices and mitigation measures are presented to reduce impacts to less than significant.

The air quality analysis includes a review of criteria pollutant⁴ and precursor emissions such as carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), volatile organic compounds (VOC) as reactive organic gases (ROG), particulate matter less than 10 micrometers (coarse particulate or PM₁₀), and particulate matter less than 2.5 micrometers (fine particulate or PM_{2.5}). GHG emissions include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O).

Regulatory models used to estimate air quality impacts include:

- California Air Resources Board (CARB) EMFAC⁵ emissions inventory model. EMFAC is the latest emission inventory model that calculates emission inventories and emission rates for motor vehicles operating on roads in California. This model reflects CARB's current understanding of how vehicles travel and how much they emit. EMFAC can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future.
- CARB OFFROAD⁶ emissions inventory model. OFFROAD is the latest emission inventory model that calculates emission inventories and emission rates for off-road equipment such as loaders, excavators, and off-road haul trucks operating in California. This model reflects CARB's current understanding of how equipment operates and how much they emit. OFFROAD can be used to show how California off-road equipment emissions have changed over time and are projected to change in the future.
- USEPA's AP 42 Compilation of Air Pollutant Emission Factors contains emission factors for stationary point and area emission sources such as those associated with vehicle travel on paved roads and unpaved surfaces, and material handling and storage.⁷

4.0 EXISTING CONDITIONS

The project site is near Desert Center (Riverside County) within the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains which dot the vast terrain rise from 1,000 to 4,000 feet above the valley floor. Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are due to the proximity of the

³ South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, March 2023, <http://www.aqmd.gov/ceqa/hdbk.html>.

⁴ Criteria air pollutants refer to those air pollutants for which the USEPA and CARB has established National Ambient Air Quality Standards and California Ambient Air Quality Standards under the Federal Clean Air Act.

⁵ California Air Resources Board, EMFAC2021 User's Guide, January 15, 2021, https://ww2.arb.ca.gov/sites/default/files/2021-01/EMFAC202x_Users_Guide_01112021_final.pdf

⁶ California Air Resources Board, *Mobile Source Emissions Inventory Documentation – Off Road Diesel Equipment*, <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road> and https://ww3.arb.ca.gov/msei/ordiesel/ordas_ef_fcf_2017.pdf

⁷ United States Environmental Protection Agency, AP 42 Compilation of Air Pollutant Emission Factors, <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-stationary-sources>

MDAB to coastal and central regions and the blocking nature of the Sierra Nevada Mountains to the north; air masses pushed onshore in southern California by differential heating are channeled through the MDAB. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet), whose passes form the main channels for these air masses. The Chuckwalla/Palo Verde Valley portion of the Mojave Desert lies in the low desert, at the eastern end of a series of valleys (notably the Coachella Valley) whose primary channel is the San Gorgonio Pass (2,300 feet) between the San Bernardino and San Jacinto Mountains.

Meteorological Conditions

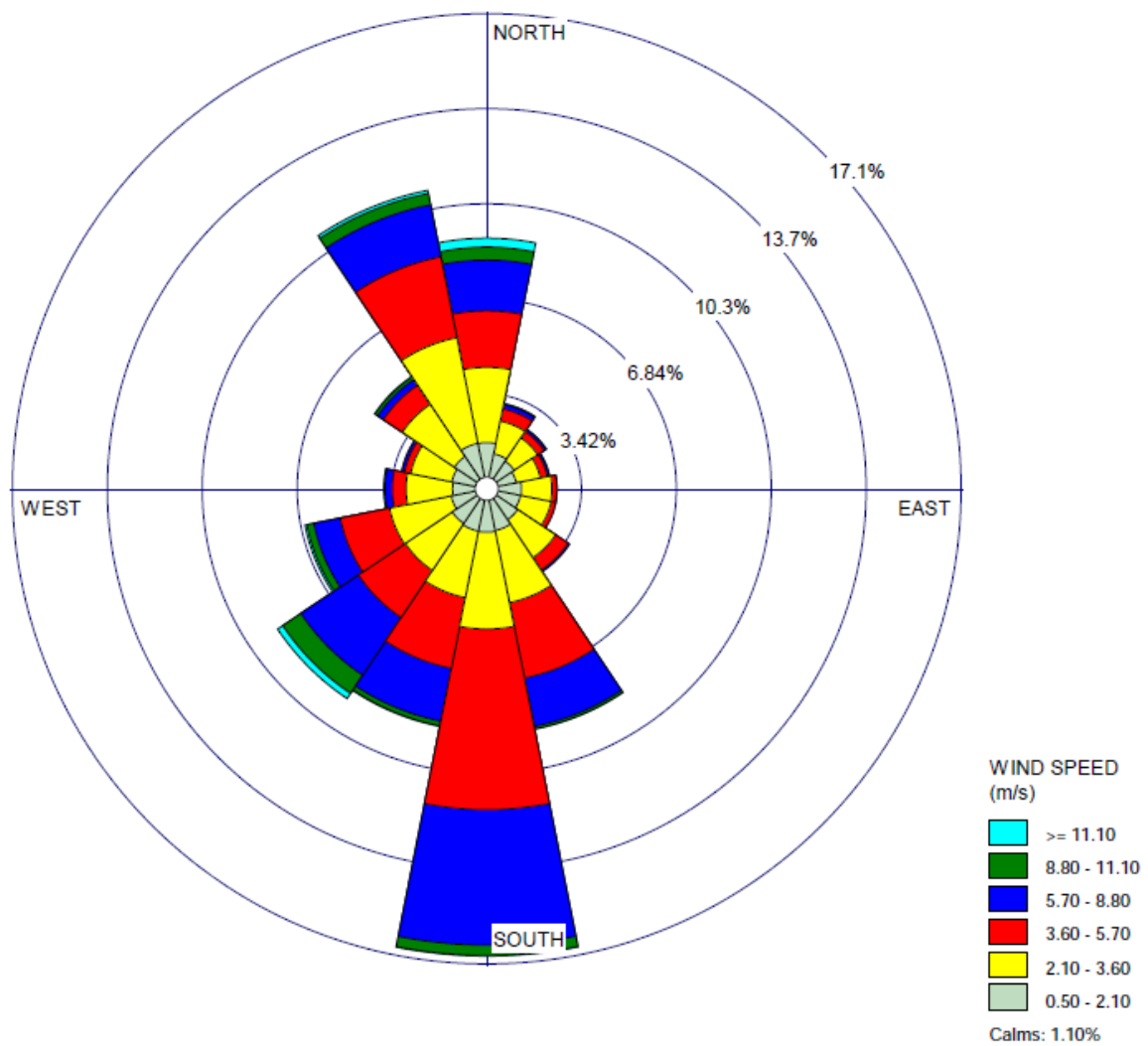
Air quality is affected by the rate, amount, and location of pollutant emissions and the associated meteorological conditions that influence pollutant movement and dispersal. Atmospheric conditions, including wind speed, wind direction, stability, and air temperature, in combination with local surface topography (i.e., geographic features such as mountains, valleys, and Pacific Ocean), determine the effect of air pollutant emissions on local air quality.

During the summer the MDAB is generally influenced by a Pacific Subtropical High cell that sits off the coast, inhibiting cloud formation and encouraging daytime solar heating. The MDAB is rarely influenced by cold air masses moving south from Canada and Alaska, as these frontal systems are weak and diffuse by the time they reach the desert. Most desert moisture arrives from infrequent warm, moist and unstable air masses from the south. The MDAB averages between three and seven inches of precipitation per year (from 16 to 30 days with at least 0.01 inches of precipitation). However, the Chuckwalla Valley portion of the MDAB receives an average of 1.9 inches of rainfall per year. The MDAB is classified as a dry-hot desert climate, with portions classified as dry-very hot desert, to indicate at least three months have maximum average temperatures over 100°F. The region is characterized by extreme fluctuations of daily temperatures, strong seasonal winds, and clear skies. January is the coldest month, with a mean low temperature of 37°F. July is the hottest month, with a mean high temperature of 108°F.

As shown in **Figure 3: Windrose for Blythe Airport**, wind directions are predominantly from the south and north with a low frequency of calm wind speed conditions (approximately 1.1 percent). The average annual wind speed is 8.7 miles per hour (3.9 meters per second). In this region, wind speeds tend to be higher during the summer months and during the daytime.⁸

⁸ California Air Resources Board, HARP Air Dispersion Modeling and Risk Assessment Tool, <https://ww2.arb.ca.gov/resources/documents/harp-aermod-meteorological-files>

Figure 3 **Windrose for Blythe Airport**



Criteria Air Pollutants

The following provides a summary of the potential health and welfare effects and typical sources of each of the criteria air pollutants and air toxics.

Ozone

Ozone (or O₃) is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and that can cause substantial damage to vegetation and other materials. O₃ is not emitted directly into the atmosphere but is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving VOC and NO_x. VOC and NO_x are known as precursor compounds for O₃. Substantial ozone production generally requires O₃ precursors to be present in a stable atmosphere with strong sunlight for approximately three hours. O₃ is a regional air pollutant because it is not emitted directly by sources but is formed downwind of sources of VOC and NO_x under the influence of wind and sunlight. O₃ concentrations tend to be higher in the late spring, summer, and fall, when long sunny days combine with regional air subsidence inversions to create conditions conducive to the formation and accumulation of secondary photochemical compounds.

Carbon Monoxide

CO is a nonreactive pollutant that is a product of incomplete combustion of organic material, and is mostly associated with motor vehicle traffic, and in wintertime, with wood-burning stoves and fireplaces. High CO concentrations develop primarily during winter when periods of light winds combine with the formation of ground-level temperature inversions (typically from the evening through early morning). These conditions result in reduced dispersion of vehicle emissions. Motor vehicles also exhibit increased CO emission rates at low air temperatures.

When inhaled at high concentrations, CO combines with hemoglobin in the blood and reduces its oxygen-carrying capacity, resulting in reduced levels of oxygen reaching the brain, heart, and other body tissues. This condition is especially critical for people with cardiovascular diseases, chronic lung disease, or anemia. CO measurements and modeling were important in the early 1980s when CO levels were regularly exceeded throughout California, but in more recent years, CO measurements and modeling are not a priority in most California air districts due to the retirement of older vehicles, fewer emissions from new vehicles, and improvements to fuels.

Nitrogen Oxides

When combustion temperatures are extremely high, as in aircraft, truck and automobile engines, atmospheric nitrogen combines with oxygen to form various oxides of nitrogen. Nitric oxide (NO) and nitrogen dioxide (NO₂) are the most significant air pollutants generally referred to as NO_x. Nitric oxide is a colorless and odorless gas that is relatively harmless to humans, quickly converts to NO₂ and can be measured. Nitrogen dioxide has been found to be a lung irritant capable of producing pulmonary edema. Inhaling NO₂ can lead to respiratory illnesses such as bronchitis and pneumonia.

Volatile Organic Compounds

VOC means any compound of carbon, excluding carbon monoxide, carbon dioxide (CO₂), carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric

photochemical reactions and thus, is a precursor of ozone formation. VOC includes a variety of chemicals, some of which may have short- and long-term adverse health effects. VOC are emitted by a wide array of products numbering in the thousands. Examples include paints and lacquers, paint strippers, cleaning supplies, building materials and furnishings, as well as fuel storage and use.

VOC can cause eye, nose, and throat irritation; headaches, loss of coordination, nausea; and damage to liver, kidney, and central nervous system. Some organics can cause cancer in animals; some are suspected or known to cause cancer in humans. The ability of organic chemicals to cause health effects varies greatly from those that are highly toxic, to those with no known health effects. As with other pollutants, the extent and nature of the health effect will depend on many factors including level of exposure and length of time exposed. Eye and respiratory tract irritation, headaches, dizziness, visual disorders, and memory impairment are among the immediate symptoms that some people have experienced soon after exposure to some organics.

Particulate Matter

PM₁₀ and PM_{2.5} consist of airborne particles that measure 10 micrometers or less in diameter and 2.5 micrometers or less in diameter, respectively. PM₁₀ and PM_{2.5} represent fractions of particulate matter that can be inhaled into the air passages and the lungs, causing adverse health effects. Particulate matter in the atmosphere results from many kinds of dust- and fume-producing industrial and agricultural operations, fuel combustion, wood burning stoves and fireplaces, and atmospheric photochemical reactions. Some sources of particulate matter, such as demolition, construction activities and mining, are more local in nature, while others such as vehicular traffic and wood burning stoves and fireplaces, have a more regional effect.

Very small particles of certain substances (e.g., sulfates and nitrates) can cause lung damage directly, or can contain adsorbed gases (e.g., chlorides or ammonium) that may be injurious to health. Particulates can also damage materials and reduce visibility. Dust comprised of large particles (diameter greater than 10 micrometers) settles out rapidly and is easily filtered by human breathing passages. This dust is of concern more as a soiling nuisance rather than a health hazard. The remaining fractions, PM₁₀ and PM_{2.5}, are a health concern particularly at levels above the federal and California ambient air quality standards. PM_{2.5} (including diesel exhaust particles) is thought to have greater effects on health, because these particles are so small and thus penetrate to the deepest parts of the lungs.

Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, coughing, bronchitis, and respiratory illnesses in children. Mortality studies since the 1990s have shown a statistically significant direct association between mortality (premature deaths) and daily concentrations of particulate matter in the air. Despite important gaps in scientific knowledge and continued reasons for some skepticism, a comprehensive evaluation of the research findings provides persuasive evidence that exposure to fine particulate air pollution has adverse effects on cardiopulmonary health. The CARB has estimated that achieving the ambient air quality standards for PM₁₀ could reduce premature mortality rates by 6,500 cases per year.

Sulfur Dioxide

SO₂ is a combustion product of sulfur or sulfur-containing fuels such as coal and diesel. SO₂ is also a precursor to the formation of atmospheric sulfate and particulate matter and contributes to potential atmospheric sulfuric acid formation that could precipitate downwind as acid rain.

Lead

Lead has a range of adverse neurotoxin health effects and was released into the atmosphere via leaded gasoline products. The phase-out of lead-gasoline in California has resulted in dramatically decreased levels of atmospheric lead. Metal processing is currently the primary source of lead emissions. The highest concentrations of lead in air are generally found near lead smelters and general aviation airports; where piston aircraft use leaded fuel. Other stationary sources that generate lead emissions include waste incinerators, utilities, and lead-acid battery manufacturers.

Sulfates

Sulfates are the fully oxidized ionic form of sulfur produced when sulfur dioxide is fully oxidized in the atmosphere. Sulfates are produced by emissions from automobiles, power plants, and industrial activity, and contribute to general atmospheric haziness. Typical health effects associated with exposure to sulfates include respiratory illness and an increased risk of cardio-pulmonary disease.

Vinyl Chloride

Vinyl chloride is an artificially created colorless gas with a mild, slightly sweet odor. The gas is used in the manufacture of vinyl products, including polyvinyl chloride plastic. Vinyl chloride emissions are produced from the vinyl manufacturing process as well as from the breakdown of vinyl products in landfills and hazardous waste sites. The health effects associated with vinyl chloride include dizziness, headaches, and drowsiness from short-term exposure, and liver damage and cancer resulting from long-term exposure.

Hydrogen Sulfide

Hydrogen Sulfide (H₂S) is a naturally occurring, colorless gas that at low concentrations produces a distinctive rotten egg odor. At higher concentrations, olfactory fatigue prevents detection of odor. The gas is produced through the bacteriological breakdown of organic materials as well as during oil and gas production and geothermal power generation. Health effects associated with H₂S include exposure to a disagreeable odor, coughing, irritation to eyes, and impairment of the respiratory system.

Visibility Reducing Particles

Visibility reducing particles are particulate matter composed of many different substances that are suspended in the atmosphere and contribute to haze and diminished visibility.

Ambient Air Quality Standards

The United States Environmental Protection Agency (USEPA) has established the National Ambient Air Quality Standards (NAAQS) under the Clean Air Act (CAA) for six common air pollutants known as “criteria

pollutants”.⁹ These air pollutants consist of CO, NO₂, ozone, particulate matter (PM₁₀ and PM_{2.5}), SO₂, and lead (Pb). An ambient air quality standard establishes the concentration above which the pollutant is known to cause adverse health effects to sensitive groups within the population such as children and the elderly. The goal is for localized project effects not to cause or contribute to an exceedance of the standards. Ambient air quality standards are classified as either “primary” or “secondary” standards. Primary standards define levels of air quality, including an adequate margin of safety, necessary to protect public health. Secondary ambient air quality standards define levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

The CARB manages air quality, regulates mobile emissions sources, and oversees the activities of county and regional Air Pollution Control Districts and Air Quality Management Districts. CARB regulates local air quality indirectly by establishing State ambient air quality standards and vehicle emissions and fuel standards; and by conducting research, planning and coordinating activities. California has adopted ambient standards (known as California Ambient Air Quality Standards or CAAQS) that are more stringent than the federal standards for some criteria air pollutants. These ambient air standards are shown in **Table 1: State and National Criteria Air Pollutant Standards, Effects, and Sources**.

The SCAQMD has jurisdiction over an area of approximately 10,743 square miles. The SCAB and MDAB are sub-regions of the SCAQMD jurisdiction. While air quality in this area has improved, the SCAQMD requires continued diligence to meet air quality standards. The SCAQMD has adopted a series of Air Quality Management Plans to meet the CAAQS and NAAQS. These plans require control technology for existing sources, control programs for area sources and indirect sources, a SCAQMD permitting system designed to allow no net increase in emissions from any new or modified permitted emission sources and transportation control measures.

⁹ U.S. Environmental Protection Agency (USEPA), *Six Common Air Pollutants*, <https://www.epa.gov/criteria-air-pollutants>

Table 1: State and National Criteria Air Pollutant Standards, Effects, and Sources

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone	1 Hour 8 Hour	0.09 ppm 0.07 ppm	– 0.070 ppm	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when reactive organic gases and nitrogen oxides react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial / industrial mobile equipment.
Carbon Monoxide (CO)	1 Hour 8 Hour	20 ppm 9.0 ppm	35 ppm 9.0 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
Nitrogen Dioxide (NO ₂)	1 Hour Annual	0.18 ppm 0.03 ppm	0.10 ppm 0.053 ppm	Irritating eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
Sulfur Dioxide (SO ₂)	1 Hour 3 Hour 24 Hour Annual	0.25 ppm – 0.04 ppm –	0.075 ppm 0.5 ppm 0.14 ppm 0.030 ppm	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
Respirable Particulate Matter (PM ₁₀)	24 Hour Annual	50 µg/m ³ 20 µg/m ³	150 µg/m ³ –	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
Fine Particulate Matter (PM _{2.5})	24 Hour Annual	– 12 µg/m ³	35.0 µg/m ³ 9.0 µg/m ³	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including nitrogen oxides, sulfur oxides, and organics.
Lead (Pb)	Month Rolling 3 Month	1.5 µg/m ³ –	– 0.15 µg/m ³	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction.	Present sources: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.

SOURCE: California Air Resource Board, *Ambient Air Quality Standards*, May 4, 2024, <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf>. NOTE: (ppm = parts per million; µg/m³ = micrograms per cubic meter)

Toxic Air Contaminants

Toxic air contaminants (TAC) are regulated under both state and federal laws. Federal laws use the term “Hazardous Air Pollutants” (HAP) to refer to the same types of compounds that are referred to as TAC under state law. Both terms encompass essentially the same compounds. Under the 1990 Federal Clean Air Act Amendments, 189 substances are regulated as HAP.

With respect to state law, in 1983 the California legislature adopted Assembly Bill 1807 (AB 1807), which establishes a process for identifying TAC and provides the authority for developing retrofit air toxics control measures on a statewide basis. Air toxics in California may also be regulated because of another state law, the Air Toxics “Hot Spots” Information and Assessment Act of 1987, or Assembly Bill 2588 (AB 2588). Under AB 2588, TAC from individual facilities must be quantified and reported to the local air pollution control agency. The facilities are then prioritized by the local agencies based on the quantity and toxicity of these emissions, and on their proximity to areas where the public may be exposed. In establishing priorities, the air districts are to consider the potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of the facility to potential receptors, and any other factors that the air district determines may indicate that the facility may pose a significant risk. High priority facilities are required to perform a Health Risk Screening Assessment, and if specific risk thresholds are exceeded, they are required to communicate the results to the public in the form of notices and public meetings. Depending on the health risk levels, emitting facilities can be required to implement varying levels of risk reduction measures. CARB identified approximately 200 TAC, including the 189 federal HAP, under AB 2588.

The SCAQMD has conducted several comprehensive studies on air toxics called the Multiple Air Toxics Exposure Study (MATES-III, MATES-IV, and MATES-V). The monitoring program found that the average cancer risk in the region from carcinogenic air pollutants has been decreasing since 2005.^{10 11 12} Importantly, the project site is out of the region in which MATES was conducted (generally within the urban areas of the western portion of SCAQMD), its associated health impacts would be expected to be much less than those reported and would be confined to the area along Interstate 10.

General Conformity Rule

Section 176I of the CAA prohibits the BLM from taking an action in a nonattainment/maintenance area unless the emissions from the action conform to the State Implementation Plan (SIP) for the area. The USEPA promulgated the General Conformity Rule to evaluate emissions from projects that are not highway or transit related. Under this rule, a General Conformity Determination is not required if levels of the pollutants (or pollutant precursors) for which an area is designated nonattainment/maintenance are below *de-minimis* levels, i.e., levels at which it can be presumed there would be no impact to air quality. If a project is in an attainment

¹⁰ South Coast Air Quality Management District, Multiple Air Toxics Exposure Study (MATES-III) in the South Coast Air Basin, September 2008, <https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iii>

¹¹ South Coast Air Quality Management District, Multiple Air Toxics Exposure Study (MATES-IV) in the South Coast Air Basin, May 1, 2015, <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iv>

¹² South Coast Air Quality Management District, Multiple Air Toxics Exposure Study (MATES-V) in the South Coast Air Basin, August 2021, <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>

area, the General Conformity Rule does not apply. The project area is considered an unclassified/attainment area for all the NAAQS; therefore, the General Conformity Rule does not apply.

Because the Riverside County portion of the MDAB has federal designations of unclassifiable/attainment for all pollutants, including ozone (with NO_x and VOC as precursors) and PM₁₀ and PM_{2.5}, federal agency actions are not subject to CAA general conformity review requirements. Without applicable thresholds under the federal CAA General Conformity rule, this analysis conservatively assumes that the protective de minimis thresholds for NO_x, VOC, and PM₁₀ and PM_{2.5} from the nearby Salton Sea Air Basin portion of the SCAQMD jurisdiction may be used in the characterization of project-specific emissions for environmental planning purposes. These criteria air pollutant emission thresholds are: 25 tons per year of NO_x or VOC; 70 tons per year of PM₁₀ or PM_{2.5}; and 100 tons per year for CO and SO_x.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated metropolitan planning organization for the Southern California region and is the largest metropolitan planning organization in the United States.

On May 7, 2020, SCAG's Regional Council adopted the Connect SoCal (2020–2045 Regional Transportation Plan [RTP]/Sustainable Communities Strategy [SCS]). Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura.

South Coast Air Quality Management District

The project site and activities are under local jurisdiction of the SCAQMD. Standards for air quality across the SCAQMD jurisdiction are documented in the Air Quality Management Plan (AQMP). The AQMP describes and evaluates the air pollution control strategies to be taken by air quality management agencies in order to bring the area into compliance with the ambient air quality standards. SCAQMD's 2022 AQMP is based on regional growth forecasts for the SCAG region, including population projections based on the regional growth forecast from the 2020 Regional Transportation Plan/Sustainable Communities Strategy. No State Implementation Plan is necessary for the Riverside County portion of the MDAB because it is classified as attainment for the ozone and particulate matter standards.

Most equipment used for construction is classified as mobile sources and are thus exempt from stationary source permit requirements. According to SCAQMD Rule 219, some other equipment used may be subject to permit requirements, such as boilers, generators, compressors, pumps, and concrete batch plants.

SCAQMD adopts air quality rules and regulations. For the project, the relevant SCAQMD rules and regulations include:

- **Rules 201 and 203 (Permits to Construct and Operate):** These rules require that owners of applicable construction or operation equipment obtain written permits from the SCAQMD prior to construction and operation.
- **Rule 402 (Nuisance):** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 (Fugitive Dust):** This rule requires fugitive dust sources to implement Best Available Control Measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM₁₀ emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. A fugitive dust control program pursuant to the provisions of SCAQMD Rules 402 and 403 shall be implemented. This program shall include, but not be limited to the following:
 - Prior to start of the initial on-site construction, the City Engineer shall confirm that the proposed construction plan follows SCAQMD Rule 403, and fugitive dust shall be controlled by the applicable best available control measures listed in Table 1 of Rule 403.
 - Water or a stabilizing agent shall be applied at least three times daily, preferably in the mid-morning, afternoon, and after work is done for the day, to exposed surfaces including graded and disturbed areas in enough quantity to prevent generation of dust plumes.
 - Track-out shall not extend 25 feet or more from an active operation and track-out shall be removed at the conclusion of each workday. The contractor shall use a gravel apron, 25 feet long by road width, or a pipe-grid track-out control device to reduce mud/dirt track-out from active operations and unpaved truck exit routes.
 - A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project alignment.
 - All trucks hauling dirt, sand, soil, or other loose materials are to be covered (e.g., with fabric tarps or other enclosures that would reduce fugitive dust emissions) and maintain a freeboard height of 12 inches, in accordance with California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).
 - Traffic speeds on unpaved roads shall be limited to 15 miles per hour.
 - Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.
 - On-site stockpiles shall be covered or watered at least twice per day.
 - A publicly visible sign shall be posted with the telephone number and person to contact at the SCAQMD regarding dust complaints. This person shall respond and take corrective action within 24 hours. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

- **Rule 1110.2 (Emissions from Gaseous- and Liquid-Fueled Engines):** This rule was adopted to reduce NO_x, VOC, and CO emissions from stationary and portable engines over 50 horsepower, including standby generators. All standby generators used for project operations would be selected from the SCAQMD certified generators list and meet applicable federal standards for diesel emissions. For after-treatment of engine exhaust air, a diesel particulate filter shall be provided to meet the emission level requirements of SCAQMD.
- **Rule 1113 (Architectural Coatings):** This rule requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce volatile organic compounds (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories. Per Rule 1113 no person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in Rule 1113. All paints shall be applied using either high-volume low-pressure spray equipment or by hand application.
- **Rule 2202 (Employee Commute Reduction Program Guidelines):** This rule is designed to assist employers in understanding the development and implementation requirements of the Employee Commute Reduction Program (ECRP) at their worksites. The ECRP focuses on reducing work related vehicle trips and vehicle miles traveled to a worksite with the purpose of achieving and maintaining the employers' designated average vehicle ridership targets.

The applicant shall also require construction contractors to implement the following regulatory compliance measures during construction to reduce exhaust emissions:

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.¹³
- All streets located within the construction site area shall be swept at least once a day using SCAQMD Rule 1186 certified street sweepers if visible soil materials are carried to adjacent streets.
- Construction contractors would be required to recycle or salvage a minimum of 65 percent of the non-hazardous construction and demolition waste generated directly from construction and demolition of the project per CalGreen Construction Waste Management Requirements.

Emergency generator emissions are required to follow applicable federal emissions standards and compliance with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) mandated emission limits and operating hour constraints. This air quality analysis also assumed that the standby generators would operate up to two hours per day and a total of 50 hours per year for testing and maintenance (per SCAQMD Rule 1470 limit). SCAQMD requires that all internal combustion

¹³ Code of Federal Regulations, Part 1068 – General Compliance Provisions for Highway, Stationary, and Nonroad Programs, <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-U/part-1068>

engines (ICE) greater than 50 brake horsepower (bhp) and gas turbines greater than 2,975,000 Btu per hour obtain a permit to construct prior to installation of the engines at a site.

SCAQMD defines a standby ICE or turbine for non-utility power generation as one that does not operate more than 200 hours a year and is only operated in the event of an emergency power failure or for routine testing and maintenance is considered a standby backup generator for power generation. Operators should petition the SCAQMD's Hearing Board for a variance to operate in excess of the allowed 200 hours before it is anticipated that the hours may be exceeded.

- The internal combustion engines must meet SCAQMD's Best Available Control Technology (BACT) requirements.
- It is advisable before purchasing any equipment to consult with the SCAQMD and apply for approval of a Permit to Construct from the SCAQMD prior to installation of the engine. Typically, the SCAQMD either issues a Permit to Construct or a Permit to Construct/Operate.
- The applicant would conduct maintenance and/or testing on each of the seven standby generators on separate days to limit daily emissions from maintenance/testing activities.

Sensitive Receptors

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive than the general public to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress. People engaged in strenuous work or exercise also have increased sensitivity to poor air quality. The CARB and SCAQMD has identified the following people as most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and those with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive population groups.

Residential areas are considered more sensitive to air quality conditions than commercial and industrial areas because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational uses are also considered sensitive, due to the greater exposure to ambient air quality conditions and because the presence of pollution detracts from recreational experience. Offsite workers are also considered sensitive receptors by the SCAQMD. There are no sensitive receptors within ½ mile (2,640 feet) of the project site. The Palm Nursery is located adjacent to the project site but does not contain continuous workers. There are residences approximately five to seven miles to the northwest (off Highway 177) of the Savira Solar Project site.

Background Air Concentrations

The SCAQMD maintains a network of monitoring stations within the project vicinity that monitor air quality and compliance with applicable ambient standards. A monitoring station is located in Blythe at 445 West Murphy Street, which measures ozone; approximately 35 miles to the east of the project site. The monitoring station in Palm Springs measures ozone, CO, NO₂, PM₁₀, and PM_{2.5} at FS-590 Racquet Club Avenue; approximately 73 miles to the west of the project site. **Table 2: Ambient Monitoring Data** summarizes the most recent three years of ambient monitoring data.

The 24-hour and annual PM₁₀ standards were exceeded in 2022, 2023, and 2024. The annual PM_{2.5} standard was exceeded in 2024. PM₁₀ and PM_{2.5} concentrations may have been adversely affected by wildfires and windblown

fugitive dust. No other standards were exceeded during the three-year period. The MDAB has federal designations of unclassifiable/attainment for all pollutants, but state nonattainment of ozone and PM₁₀, which is reflected in the ambient monitoring data.

Table 2: Ambient Monitoring Data (2022 - 2024)

Pollutant	Monitoring Data by Year			
	Standard ^a	2022	2023	2024
Ozone				
Highest 1 Hour Average (ppm) ^b	0.090/-	0.066	0.071	0.063
Highest 8 Hour Average (ppm) ^b	0.070	0.063	0.065	0.060
Nitrogen Dioxide				
Highest 1 Hour Average (ppm) ^b	0.180/0.100	0.0375	0.0354	0.0365
Annual Average (ppm) ^b	0.030/0.053	0.0063	0.0055	0.0064
Carbon Monoxide				
Highest 1 Hour Average (ppm) ^b	20/35	1.1	0.9	3.4
Highest 8 Hour Average (ppm) ^b	9/9	0.5	0.8	1.1
Particulate Matter (PM₁₀)				
Highest 24-Hour Average (mg/m ³) ^b	50/150	432	529	251
State Annual Average (mg/m ³) ^b	20/-	25.3	24.2	25.6
Particulate Matter (PM_{2.5})				
Highest 24-Hour Average (mg/m ³) ^b	-/35	31.2	26.2	36.0
State Annual Average (mg/m ³) ^b	12/9	6.33	5.92	7.45
NOTES: Values in bold are in excess of at least one applicable standard. a. Generally, state standards/national standards are not to be exceeded more than once per year. b. ppm = parts per million; mg/m ³ = micrograms per cubic meter.				

Source: United States Environmental Protection Agency, AirData, <https://www.epa.gov/outdoor-air-quality-data/interactive-map-air-quality-monitors>

5.0 THRESHOLDS OF SIGNIFICANCE

The significance of potential impacts was determined based on State CEQA Guidelines, Appendix G, and SCAQMD's *CEQA Air Quality Handbook*. Using Appendix G evaluation thresholds, a project would be considered to have significant air quality impacts if it were to:

- A. Conflict with or obstruct implementation of the applicable air quality plan;
- B. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
- C. Expose sensitive receptors to substantial pollutant concentrations; or
- D. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Because of SCAQMD's regulatory role in the Air Basin, the significance thresholds and analysis methodologies in the SCAQMD's *CEQA Air Quality Handbook* were used in evaluating project impacts for construction, operations,

and air toxics.¹⁴ These significance thresholds, under which the project was evaluated, are described within the following section. SCAQMD has identified thresholds to determine the significance of regional air quality emissions for construction activities and project operation, as shown in **Table 3: Mass Daily Emissions Thresholds**.

Table 3: SCAQMD Mass Daily Emissions Thresholds (pounds)

Pollutant	Construction	Operation
VOC	75	55
NO _x	100	55
CO	550	550
SO ₂	150	150
PM ₁₀	150	150
PM _{2.5}	55	55
Lead	3	3

Source: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, March 2023, <http://www.aqmd.gov/ceqa/hdbk.html>

For emissions exceeding the regional significance thresholds, the SCAQMD also provides air quality significance thresholds for ambient air quality impact assessments, which may be used to calculate the downwind concentrations caused by the on-site portions of project emissions.

For emissions from sites that are near sensitive receptors, SCAQMD developed the Localized Significance Thresholds (LSTs) to evaluate whether a mass emission rate from a project may generate significant adverse localized air quality impacts. The LSTs may be used by lead agencies as a way of indicating whether a project could locally exceed the ambient air quality standards at a given distance from the site boundary.¹⁵ The LSTs vary depending on the meteorological conditions for each “Source Receptor Area” within the SCAQMD jurisdiction.

Table 4: SCAQMD Localized Significance Emissions Thresholds shows the LSTs recommended by SCAQMD for the project area (East Riverside County).

¹⁴ South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, March 2023, <http://www.aqmd.gov/ceqa/hdbk.html>

¹⁵ South Coast Air Quality Management District, SCAQMD Localized Significance Thresholds, Appendix C - Mass Rate LST Look-up Tables, October 2009, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

Table 4: SCAQMD Localized Significance Emissions Thresholds (pounds)

Pollutant	Construction			Operation		
Distance from Sources (meters)	100	200	500	100	200	500
NO _x	425	547	875	425	547	875
PM ₁₀	67	112	248	16	27	60
PM _{2.5}	19	37	128	5	9	31
CO	5,331	10,178	31,115	5,331	10,178	31,115

Source: South Coast Air Quality Management District, SCAQMD Localized Significance Thresholds, Appendix C - Mass Rate LST Look-up Tables, October 2009, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

Note: These LSTs are for sites of five acres. East Riverside County is SCAQMD "Source Receptor Area" zone 31.

If any of the LSTs are exceeded then refined dispersion modeling may be conducted. Using refined dispersion modeling, the project would result in a significant construction and/or operational air quality impact if the project exceeds the ambient concentration significance thresholds set forth in **Table 5: SCAQMD Ambient Air Quality Significance Thresholds for Criteria Pollutants**.

Table 5: SCAQMD Ambient Air Quality Significance Thresholds for Criteria Pollutants

Pollutant	Averaging Period	Pollutant Concentration Threshold
CO	1-hour /8-hour	SCAQMD is in attainment (federal and state); project is significant if it causes or contributes to an exceedance of the attainment standards of 20 ppm (1-hour) and 9 ppm (8-hour)
NO ₂	1-hour	SCAQMD is in attainment (federal and state); project is significant if it causes or contributes to an exceedance of the following attainment standard 0.18 ppm (state)
	Annual	0.03 ppm (state) and 0.0534 ppm (federal)
PM ₁₀	24-hour	10.4 µg/m ³ (construction) and 2.5 µg/m ³ (operation)
	Annual	1.0 µg/m ³ (construction and operation)
PM _{2.5}	24-hour	10.4 µg/m ³ (construction) and 2.5 µg/m ³ (operation)
SO ₂	1-hour	0.25 ppm (State) and 0.075 ppm (federal)
	24-hour	0.04 ppm (State)
Lead	30-day Average	1.5 µg/m ³ (State)
	Rolling 3-month Average	0.15 µg/m ³ (federal)

Source: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, March 2023, <http://www.aqmd.gov/ceqa/hdbk.html>

Per SCAQMD guidance, the evaluated concentrations of CO, NO₂, and SO₂ would include both the project contribution plus background concentrations (based on **Table 2: Ambient Monitoring Data**). The total

concentration is then compared to the significance thresholds. For CO, NO₂, and SO₂, these significance thresholds are reflective of the CAAQS and NAAQS. Per SCAQMD guidance, the project contribution of PM₁₀ and PM_{2.5} would be compared to the significance thresholds without adding background concentrations.

6.0 CONSTRUCTION EMISSIONS INVENTORY

Intermittent, short-term emissions that occur from project construction were evaluated. The analysis focuses on maximum daily and annual emissions from offroad equipment and motor vehicles. EMFAC and OFFROAD were used to quantify construction-related pollutant emissions for the project. The supporting information are included in **Attachment A: Emissions Inventory Supporting Information**. The emissions generated from the project include:

- Dust (including PM₁₀ and PM_{2.5}) primarily from “fugitive” sources (i.e., emissions released through means other than through a stack or tailpipe) such as material handling and travel on unpaved surfaces; and
- Combustion exhaust emissions of criteria air pollutants (ROG, NO_x, CO, PM₁₀, and PM_{2.5}) primarily from operation of heavy off-road construction equipment, haul trucks, (primarily diesel-operated), and construction worker automobile trips (primarily gasoline-operated).
- VOC as ROG primarily from “fugitive” sources such as architectural coating and paving.

Fugitive dust emissions would vary from day to day, depending on the level and type of activity, silt content of the soil, and the weather. High winds (greater than 10 miles per hour) occur infrequently in the area, less than two percent of the time. In the absence of mitigation, construction activities may result in significant quantities of dust, and as a result, local visibility and PM₁₀ concentrations may be adversely affected on a temporary and intermittent basis during construction. In addition, the fugitive dust generated by construction would include not only PM₁₀, but also larger particles, which would fall out of the atmosphere within several hundred feet of the site and could result in nuisance-type impacts.

Construction is expected to occur from June of 2026 through August of 2027 (15 months). Construction activities would typically be conducted from 7 a.m. to 7 p.m. Monday through Friday. **Table 6: Construction Schedule** presents the construction schedule for the project. Emission estimates were based on the construction schedule for each phase of construction, equipment assigned to each phase, number of vehicle trips, the number/type/size of construction equipment, and the number of hours of usage of construction equipment.

Table 6: Construction Schedule

Construction Phase	Start Date	End Date
Stage 1 - Mobilization, site prep, fencing, laydown, trenching	6/1/2026	1/31/2027
Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, BESS install	9/1/2026	5/31/2027
Stage 3 - inverter, pile racking, module, BESS install, commissioning/testing	3/1/2027	8/31/2027
High Voltage Work	8/1/2026	5/31/2027

SOURCE: Clearway, Redonda and Savira_Private Land_Craft and Equipment Estimate, May 28, 2024 and March 11, 2025

On-Road Vehicles

On-road vehicular emissions were computed using the CARB's emission factor model, EMFAC. Employee trips were modeled using the light-duty auto classification. Paved road dust, brake wear, and tire wear particulate emissions were included in the analysis using EMFAC emission factors and methodologies.

The on-site construction workforce would consist of laborers, craftsmen, supervisory personnel, support personnel, and construction management personnel. The on-site construction workforce is anticipated to be an average of 125 construction workers (a maximum of approximately 275 construction workers) including laborers, craftsmen, supervisory personnel, support personnel, construction management, and delivery drivers. Most construction staff and workers would commute daily to the jobsite from within Riverside and San Bernardino Counties. Construction workers would be expected to travel 120 miles per day, of which, 4.2 miles would be on unpaved roadways.¹⁶ For this analysis, the typical unpaved travel distance for construction workers and haul trucks was assumed to be half of 4.2 miles or 2.1 miles as all vehicles and trucks would not be expected to travel the entire length of the unpaved road as activities would be throughout the project site and not only at the end of the access road.

Materials would be delivered to the site during construction periodically throughout the day via trucks. Material deliveries would avoid rush hour. Signage would be placed on the delivery route from the Corn Springs exit off the Interstate 10 directing delivery traffic to the proposed locations. Once delivered to the site, construction equipment would be used on site for the construction phase and transported off site when no longer needed for construction. Haul trucks trips involve a maximum of 20 per day with an average of 15 per day. Haul trucks would be expected to travel 100 miles per day.¹⁷

Trip lengths assume that all construction worker vehicles travel an average of 120 miles for any type of trip, for an average level of travel to population centers in Blythe or Indio. Trip lengths assume that all haul trucks travel an average of 100 miles for any type of trip based on some construction materials originating from the Ports of Long Beach and Los Angeles or storage areas outside of the project's air basin (Mojave Desert Air Basin). Regional emissions include the on-road vehicles traveling through or from the adjacent air basins such as MDAQMD (eastern Riverside County) and the jurisdiction of the SCAQMD (western Riverside County).

Construction worker vehicles were modeled as a combination of gasoline and diesel light-duty cars and trucks. On-site foreman pickup trucks were modeled as gasoline and diesel light-duty trucks. Haul trucks were modeled using the diesel combination long-haul truck classification, which is a heavy-heavy duty truck.

Criteria pollutant emissions associated with on-road vehicles were calculated by combining the activity information with emissions factors, in grams per mile, derived using the EMFAC emissions model. Emissions calculations were based on the running and idling calculations provided under **Equation 1**. The EMFAC emissions factors are summarized in **Table 7: Emissions Factors (grams/mile) for On-Road Vehicles** for employee vehicles, pickup trucks, and haul trucks for 2026, 2027, and 2028.

¹⁶ Clearway, Redonda and Savira_Private Land_Craft and Equipment Estimate, May 28, 2024 and March 11, 2025

¹⁷ Clearway, Redonda and Savira_Private Land_Craft and Equipment Estimate, May 28, 2024 and March 11, 2025

Equation 1

$$\text{Emission Rate (tons/year)} = \text{Emission Factor (grams/mile)} * \text{trips per day} * \text{miles per trip} * \text{days/year} * (453.59/2000 \text{ tons/gram})$$

$$\text{Emission Rate (tons/year)} = \text{Emission Factor (gram/hour)} * \text{total idle hours} * (453.59/2000 \text{ tons/gram})$$

Table 7: Emissions Factors (grams/mile) for On-Road Vehicles

Vehicle Type	ROG	CO	NOx	PM ₁₀	PM _{2.5}	SO ₂	CO ₂
2026							
Employees	0.009	0.73	0.04	0.02	0.01	0.003	277.24
Haul Trucks	0.006	0.03	0.32	0.06	0.02	0.009	991.23
Pickup Trucks	0.013	0.92	0.07	0.02	0.01	0.003	326.73
2027							
Employees	0.008	0.69	0.04	0.02	0.01	0.003	270.69
Haul Trucks	0.006	0.03	0.29	0.06	0.02	0.009	966.36
Pickup Trucks	0.011	0.86	0.06	0.02	0.01	0.003	319.21
2028							
Employees	0.007	0.66	0.04	0.02	0.01	0.003	264.56
Haul Trucks	0.005	0.03	0.27	0.06	0.02	0.009	938.62
Pickup Trucks	0.010	0.82	0.06	0.02	0.01	0.003	312.22
2029							
Employees	0.007	0.63	0.03	0.02	0.01	0.003	259.01
Haul Trucks	0.005	0.03	0.25	0.06	0.02	0.009	907.90
Pickup Trucks	0.009	0.78	0.05	0.02	0.01	0.003	305.93

Source: California Air Resources Board, 2024.

Off-Road Equipment

On-site construction equipment may include tractors, backhoes, cranes, loaders, graders, water trucks and other supporting equipment. This equipment would be used to load and unload material, handle material, and site preparation. Emission factors from CARB's OFFROAD emissions model were used. Equipment load factors (percentage of full throttle) were based on the OFFROAD emissions model. Parameters for off-road equipment, including type of equipment and fuel type, estimated horsepower (hp), and estimated annual hours of operation, were developed. **Table 8: Off-Road Equipment Operating Data** presents the operating data associated with the off-road equipment. Construction would be conducted typically during daylight hours (i.e., 7 am to 7 pm) on weekdays. Weekend and nighttime construction activities could be needed.

Table 8: Off-Road Equipment Operating Data

Equipment	hp	LF	Hours/Week	Quantity
Aerial Lift	49	0.31	20	4.0
Backhoe	127	0.37	35	2.0
Bulldozer	215	0.40	35	1.7
Crane	81	0.29	20	1.0
Forklift	89	0.20	35	3.9
Front End	225	0.37	35	2.0
Grader	179	0.41	35	2.8
Pile Driver	180	0.50	35	8.0
Roller	131	0.38	35	2.8
Skid Steer	73	0.37	20	3.1
Trencher	78	0.50	35	2.0
Water Truck	84	0.38	35	4.9
Welder	78	0.45	20	1.9

SOURCE: Clearway, Redonda and Savira_Private Land_Craft and Equipment Estimate, May 28, 2024 and March 11, 2025

This information was applied to emissions factors, in grams per hp-hour, primarily derived using the OFFROAD emissions model. **Equation 2** outlines how off-road construction equipment emissions were computed, and the uncontrolled emissions factors used in this assessment are summarized, by equipment type, in **Table 9: Uncontrolled Emissions Factors (grams/hp-hour) for Off-Road Equipment** for 2026, 2027, and 2028.

Equation 2

$$\text{Emission Rate (tons/year)} = \text{Emission Factor (grams/hp-hour)} * \text{size (hp)} * \text{hours of operation} * \text{Load Factor} * (453.59/2000 \text{ tons/gram})$$

Table 9: Uncontrolled Emissions Factors (grams/hp-hour) for Off-Road Equipment

Equipment	hp	ROG	CO	NOx	CO ₂	PM ₁₀	PM _{2.5}	SO ₂
2026								
Aerial Lift	49	0.06	1.01	0.91	178.93	0.01	0.01	0.002
Backhoe	127	0.07	1.14	0.47	191.54	0.02	0.02	0.002
Bulldozer	215	0.08	0.52	0.52	204.57	0.03	0.03	0.002
Crane	81	0.14	1.30	1.17	255.70	0.08	0.07	0.002
Forklift	89	0.05	0.69	0.43	118.68	0.03	0.03	0.001
Front End Loader	225	0.07	0.41	0.39	189.34	0.02	0.02	0.002
Grader	179	0.07	0.45	0.49	213.32	0.02	0.02	0.002
Pile Driver	180	0.11	0.59	0.87	253.76	0.04	0.04	0.002
Roller Compactor	131	0.07	1.15	0.47	197.05	0.02	0.02	0.002
Skid Steer	73	0.08	1.26	0.79	213.15	0.05	0.05	0.002
Trencher	78	0.20	1.75	1.48	298.14	0.11	0.10	0.003
Water Truck	84	0.13	1.31	0.93	217.15	0.06	0.06	0.002
Welder	78	0.09	0.90	0.72	118.16	0.02	0.02	0.001
2027								
Aerial Lift	49	0.06	1.01	0.90	178.73	0.01	0.01	0.002
Backhoe	127	0.07	1.15	0.43	191.51	0.02	0.02	0.002
Bulldozer	215	0.08	0.51	0.47	204.74	0.03	0.02	0.002
Crane	81	0.13	1.28	1.06	249.33	0.07	0.07	0.002
Forklift	89	0.05	0.69	0.39	118.39	0.03	0.03	0.001
Front End Loader	225	0.07	0.41	0.35	189.50	0.02	0.01	0.002
Grader	179	0.06	0.45	0.44	213.24	0.02	0.02	0.002
Pile Driver	180	0.11	0.58	0.77	254.22	0.03	0.03	0.002
Roller Compactor	131	0.07	1.15	0.42	196.94	0.02	0.02	0.002
Skid Steer	73	0.08	1.26	0.72	212.90	0.05	0.05	0.002
Trencher	78	0.18	1.74	1.32	296.53	0.10	0.09	0.003
Water Truck	84	0.11	1.31	0.81	217.15	0.06	0.05	0.002
Welder	78	0.09	0.89	0.70	118.14	0.02	0.01	0.001

2028								
Aerial Lift	49	0.06	1.03	0.89	182.47	0.01	0.01	0.002
Backhoe	127	0.07	1.15	0.35	193.39	0.02	0.01	0.002
Bulldozer	215	0.07	0.48	0.30	203.78	0.02	0.01	0.002
Crane	81	0.13	1.44	0.98	298.82	0.07	0.06	0.003
Forklift	89	0.04	0.70	0.32	122.95	0.02	0.02	0.001
Front End Loader	225	0.06	0.41	0.25	188.39	0.01	0.01	0.002
Grader	179	0.06	0.45	0.32	214.25	0.01	0.01	0.002
Pile Driver	180	0.09	0.54	0.51	249.58	0.02	0.02	0.002
Roller Compactor	131	0.06	1.15	0.33	198.92	0.01	0.01	0.002
Skid Steer	73	0.07	1.27	0.63	216.64	0.05	0.04	0.002
Trencher	78	0.15	1.78	1.02	324.01	0.08	0.07	0.003
Water Truck	84	0.11	1.32	0.72	217.15	0.05	0.05	0.002
Welder	78	0.08	0.89	0.68	118.13	0.01	0.01	0.001
2029								
Aerial Lift	49	0.06	1.03	0.89	181.75	0.01	0.01	0.002
Backhoe	127	0.07	1.16	0.32	193.22	0.01	0.01	0.002
Bulldozer	215	0.07	0.48	0.28	204.16	0.02	0.01	0.002
Crane	81	0.12	1.39	0.88	284.24	0.06	0.06	0.003
Forklift	89	0.04	0.70	0.29	122.21	0.02	0.02	0.001
Front End Loader	225	0.06	0.41	0.22	188.78	0.01	0.01	0.002
Grader	179	0.06	0.45	0.30	214.14	0.01	0.01	0.002
Pile Driver	180	0.09	0.55	0.45	250.53	0.02	0.02	0.002
Roller Compactor	131	0.06	1.16	0.30	198.71	0.01	0.01	0.002
Skid Steer	73	0.07	1.27	0.57	215.86	0.04	0.04	0.002
Trencher	78	0.15	1.78	0.95	319.56	0.08	0.07	0.003
Water Truck	84	0.10	1.32	0.64	217.15	0.05	0.04	0.002
Welder	78	0.08	0.89	0.67	118.09	0.01	0.01	0.001

Source: California Air Resources Board, 2024.

Table 10: Controlled Emissions Factors (grams/hp-hour) for Off-Road Equipment presents the controlled emission factors for off-road diesel construction equipment based on the tier engine assignment.

Table 10: Controlled Emissions Factors (grams/hp-hour) for Off-Road Equipment

Tier	Low hp	High hp	ROG	CO	NO _x	PM ₁₀	PM _{2.5}
Tier 3	25	49	0.29	4.1	4.63	0.28	0.28
	50	74	0.12	3.7	2.74	0.192	0.192
	75	119	0.12	3.7	2.74	0.192	0.192
	120	174	0.12	3.7	2.32	0.112	0.112
	175	299	0.12	2.6	2.32	0.088	0.088
	300	599	0.12	2.6	2.32	0.088	0.088
	600	750	0.12	2.6	2.32	0.088	0.088
	751	2000	0.12	2.6	2.32	0.088	0.088
Tier 4 Interim	25	49	0.12	4.1	4.55	0.128	0.128
	50	74	0.12	3.7	2.74	0.112	0.112
	75	119	0.11	3.7	2.14	0.008	0.008
	120	174	0.06	3.7	2.15	0.008	0.008
	175	299	0.08	2.6	1.29	0.008	0.008
	300	599	0.08	2.6	1.29	0.008	0.008
	600	750	0.08	2.6	1.29	0.008	0.008
	751	2000	0.12	2.6	2.24	0.048	0.048
Tier 4 Final	25	49	0.12	4.1	2.75	0.008	0.008
	50	74	0.12	3.7	2.74	0.008	0.008
	75	119	0.06	3.7	0.26	0.008	0.008
	120	174	0.06	3.7	0.26	0.008	0.008
	175	299	0.06	2.2	0.26	0.008	0.008
	300	599	0.06	2.2	0.26	0.008	0.008
	600	750	0.06	2.2	0.26	0.008	0.008
	751	2000	0.06	2.6	2.24	0.016	0.016

Source: California Air Resources Board, 2024.

Unpaved Roads

When a vehicle travels over an unpaved road, the force of the wheels on the road surface causes pulverization of surface material. Particles are lifted and dropped from the rolling wheels, and the road surface is exposed to strong air currents in turbulent shear with the surface. The turbulent wake behind the vehicle continues to act on the road surface after the vehicle has passed.

The emission factors for unpaved roads were calculated using the methodology found in Section 13.2.2, of USEPA's AP-42. The equation for developing the emission factor is:

Equation 3

$EF = k (S/12)^a (W/3)^b (1-CE)$

where:

- EF = size-specific emission factor (pound/VMT)
- k = empirical constant (PM₁₀ = 1.5, PM_{2.5} = 0.15)
- S = Silt content of 8.5 percent (use whole number value)
- W = Mean vehicle weight (30 tons for haul trucks, 7 tons for vendor trucks, and 2.7 tons for employee vehicles)
- a = 0.9 (empirical constant)
- b = 0.45 (empirical constant)
- CE = Control efficiency rate of 84 percent

Based on available data, the uncontrolled emission factor for unpaved roads is 0.69 pounds (315 grams) of PM₁₀ per vehicle mile traveled for haul trucks, 0.36 pounds (164 grams) of PM₁₀ per vehicle mile traveled for vendor trucks, and 0.50 pounds (225 grams) of PM₁₀ per vehicle mile traveled for employee vehicles. To account for emission controls, i.e., project access roadway improvements, a control efficiency of 84 percent was applied due to water and chemical treatment plus the reduction in fugitive dust due to vehicle speed limit of 15 mph. Round trip unpaved access road travel distances would be 2.1 miles. For this analysis, the typical unpaved travel distance for construction workers and haul trucks was assumed to be half of 4.2 miles or 2.1 miles as all vehicles and trucks would not be expected to travel the entire length of the unpaved road as activities would be throughout the project site and not only at the end of the access road.

The controlled emission factor for unpaved roads associated with the construction site is 0.11 pounds (50.4 grams) of PM₁₀ per vehicle mile traveled for haul trucks, 0.06 pounds (26.2 grams) of PM₁₀ per vehicle mile traveled for vendor trucks, and 0.05 pounds (20.8 grams) of PM₁₀ per vehicle mile traveled for employee vehicles. The ratio of PM_{2.5} to PM₁₀ was assumed to be 10 percent for unpaved roads.

Fugitive Dust from Construction Activities

In the absence of details on the time schedule, heavy equipment usage, and activity level, affected area-wide uncontrolled PM₁₀ emission factors of 0.11 and 0.42 ton/acre-month were considered for use for average and worst-case construction conditions, respectively. It was assumed that the conventional dust control measure of water spraying, with a control efficiency of 50 percent, to be applied over the disturbed area and on unpaved roads. Given the size of the project, this air quality analysis used the emission factor associated with the worst-case construction conditions.

Fugitive dust emissions from site preparation, grading equipment passes, soil movement, unloading/loading of materials, and other construction-related activities is based on work performed by Midwest Research Institute (MRI). The MRI includes an emission factor for worst-case conditions of 0.42-ton PM₁₀ per acre (942 kilograms per hectare)-month. Worst-case refers to construction sites with active large-scale earth moving operations appropriate for large-scale construction operations which involve substantial earthmoving operations without control measures.

Given the size of the project, the emission factor for worst-case conditions of 0.42-ton PM₁₀ per acre (942-kilograms per hectare)-month was used for the uncontrolled condition. An emission control efficiency of 75 percent was applied, which is based on the estimated control effectiveness of watering. The ratio of PM_{2.5} to PM₁₀ was assumed to be 21 percent for construction activities.

Construction Emissions Results

Construction and the eventual decommissioning would generate emissions at the project site and off-site along the roadways traveled by construction traffic. Construction emissions would be caused by exhaust from vehicles and equipment. Exhaust emissions include ozone precursors (VOC or ROG and NO_x), CO, and particulate matter (including PM₁₀ and PM_{2.5}). Fugitive dust includes particulate matter from soil eroded by ground-disturbing activities and by travel on unpaved surfaces and on paved road surfaces. Decommissioning activities would create a temporary phase of similar emissions to dismantle solar panels and other components after the end of the project's useful life of 40 years.

To minimize the amount of fugitive dust from unpaved surfaces and emissions from other ground-disturbing activities during the site preparation period, all construction activity would be required to comply with local air district rules regarding dust control (including SCAQMD Rule 403). Diesel and gasoline-powered construction equipment would be classified as portable or as mobile sources (off-road equipment, trucks, and helicopters during installation of the gen-tie). These sources are subject to statewide registration and fleet requirements.

On-road vehicle emissions would occur primarily off-site. The on-road sources include heavy-duty trucks to deliver equipment, concrete, water, and other materials, and light-duty vehicles carrying crews and medium-duty deliveries. Motor vehicle exhaust emissions would occur outside of the proposed work sites as the traffic would occur primarily over the region-serving transportation network.

Table 11: Estimated Maximum Daily Construction Emissions provides the estimated maximum daily construction emissions that would be associated with the project and compares those emissions to the SCAQMD's significance thresholds. The unmitigated maximum daily emissions of PM₁₀ exceed the SCAQMD's significance thresholds due to combustion equipment and fugitive dust producing activities such as unpaved road travel. Fugitive dust and combustion emissions controls are addressed via **MM AQ-1 through MM AQ-4**. Note that controlled CO emissions are greater than the uncontrolled CO emissions due to control technologies that are focused on reducing ROG, NO_x, PM₁₀, and PM_{2.5} emissions, which have a reverse effect on CO emissions. The mitigated maximum daily emissions are less than the SCAQMD's significance thresholds and thus, would have a less than significant impact. The construction impacts on air quality would be temporary, during limited time periods and affect a small geographical

area. As shown in **Sections 8 and 13**, the long-term benefits resulting from the avoidance of operational emissions (both criteria pollutants and GHG) offset the temporary emissions due to construction activities.

Table 11: Estimated Maximum Daily Construction Emissions (pounds)

Construction Year	ROG	CO	NOx	PM ₁₀	PM _{2.5}	SO ₂
Unmitigated						
2026	8.48	121	63.7	325	35.1	0.41
2027	7.46	110	53.4	298	32.3	0.38
Significance Threshold	75	550	100	150	55	150
Significant (Yes or No)?	No	No	No	Yes	No	No
Mitigated						
2026	5.95	185	33.4	34.1	4.29	0.41
2027	5.38	165	30.7	31.6	4.01	0.38
Significance Threshold	75	550	100	150	55	150
Significant (Yes or No)?	No	No	No	No	No	No

SOURCE: CARB EMFAC and OFFROAD

NOTE: Bold values represent exceedances of significance thresholds.

To conserve water while controlling dust, mitigation would allow use of soil stabilizers or soil weighting agents on unpaved roads and disturbed areas. Because some commercially available chemical dust suppression products may cause odors or may contain compounds that are air pollutants, the mitigation specifies using non-toxic soil stabilizers that avoid increasing another impact such as adverse odors or additional emissions of ozone precursors ROG or VOC.

Previous utility-scale solar projects in eastern Riverside County similar to the project have successfully used the Tier 4 standards for construction equipment as a way of ensuring the newest fleet of off-road equipment would be brought to the site. Developers of utility-scale solar projects in eastern Riverside County have tended to use contractors with “large fleets” subject to the most stringent performance requirements of the CARB In-Use Off-Road Diesel Fueled Fleets Regulation (13 California Code of Regulations, Section 2449.1), and the fleets regulation bans the addition of Tier 3 engines after January 1, 2024 [13 CCR 2449(d)(6)(D)]. Based on prior projects in eastern Riverside County, the stringent fleets requirements established by CARB, and availability of equipment meeting the Tier 4 final standards, it is anticipated that the project contractors can feasibly comply with the Tier 4 commitments.

Table 12: Estimated Average Daily Construction Emissions provides the estimated average daily construction emissions that would be associated with the project and compares those emissions to the SCAQMD’s significance thresholds (for informational purposes only). The unmitigated and mitigated average daily construction emissions would not exceed the SCAQMD’s significance thresholds.

Table 12: Estimated Average Daily Construction Emissions (pounds)

Construction Year	ROG	CO	NOx	PM ₁₀	PM _{2.5}	SO ₂
Unmitigated						
2026	3.48	46.7	26.0	105	11.7	0.15
2027	2.58	33.5	19.3	75.4	8.38	0.11
Significance Threshold	75	550	100	150	55	150
Significant (Yes or No)?	No	No	No	No	No	No
Mitigated						
2026	2.51	73.6	15.2	11.3	1.50	0.15
2027	1.83	50.0	11.4	8.34	1.10	0.11
Significance Threshold	75	550	100	150	55	150
Significant (Yes or No)?	No	No	No	No	No	No

SOURCE: CARB EMFAC and OFFROAD

NOTE: Bold values represent exceedances of significance thresholds.

Table 13: Estimated Annual Construction Emissions provides the estimated annual construction emissions that would be associated with the project. The unmitigated and mitigated annual construction emissions would not exceed the SCAQMD's significance thresholds.

Table 13: Estimated Annual Construction Emissions (tons)

Construction Year	ROG	CO	NOx	PM ₁₀	PM _{2.5}	SO ₂
Unmitigated						
2026	0.45	6.07	3.38	13.7	1.52	0.02
2027	0.34	4.36	2.51	9.81	1.09	0.01
Significance Threshold	25	100	25	70	70	100
Significant (Yes or No)?	No	No	No	No	No	No
Mitigated						
2026	0.33	9.57	1.97	1.47	0.20	0.02
2027	0.24	6.49	1.49	1.08	0.14	0.01
Significance Threshold	25	100	25	70	70	100
Significant (Yes or No)?	No	No	No	No	No	No

SOURCE: CARB EMFAC and OFFROAD

NOTE: Bold values represent exceedances of significance thresholds.

Using standard fuel consumption estimates, construction activities would require approximately 83,769 gallons (2026) and 55,870 gallons (2027) of gasoline per year (construction worker vehicles and pickup trucks), as well as approximately 109,321 gallons (2026) and 87,388 gallons (2027) of diesel fuel per year (haul trucks and offroad equipment).¹⁸

¹⁸ Fuel usage is estimated using the CalEEMod output for CO₂, and a 8.78 kgCO₂/gallon (gasoline) and 10.19 kgCO₂/gallon (diesel) conversion factor, https://www.eia.gov/environment/emissions/co2_vol_mass.php

7.0 EMISSION REDUCTION MEASURES

The project would incorporate the following measures to reduce air quality emissions:

AQ-1 Control On-Site Off-Road Equipment Emissions. The applicant, when entering construction contracts or when procuring off-road equipment or vehicles for on-site construction activities, shall ensure that only recent model year equipment or vehicles are obtained, as feasible. The following measures shall be included with contract or procurement specifications:

- All construction diesel engines not registered under CARB's Statewide Portable Equipment Registration Program, with a rating of 50 hp or higher, shall meet the Tier 4 California Emission Standards for Off-Road Compression-Ignition Engines, as specified in California Code of Regulations, Title 13, section 2423(b)(1), unless a good faith effort demonstrates that such engine is not available for a particular item of equipment. If a Tier 4 engine is not available for any off-road equipment larger than 50 hp, a Tier 3 engine shall be used or that equipment shall be equipped with retrofit controls to reduce exhaust emissions of NOx and DPM to no more than Tier 3 levels unless certified by the engine manufacturers that the use of such devices is not practical for specific engine types.¹⁹
- All diesel-fueled engines used in the construction of the facility shall have clearly visible tags showing that the engine meets the standards of this measure.
- All equipment and trucks for construction activities shall be properly maintained and the engines tuned to the engine manufacturer's specifications.
- All diesel heavy construction equipment shall not idle for more than five minutes. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement.

AQ-2 Fugitive Dust Control Plan. The applicant, its contractor, or its subcontractor shall prepare and implement a Fugitive Dust Control Plan to address fugitive dust emissions during project construction, operation, maintenance, and decommissioning. The plan shall include measures to minimize fugitive dust emissions from the commencement of construction activities through operations, maintenance, and decommissioning. In the case where the contractor obtains permit coverage under SCAQMD Rule 403, that permit, and associated plan will be incorporated into the final Fugitive Dust Control Plan prepared by the applicant. During construction, the applicant, its contractor, and subcontractors shall take every reasonable precaution to prevent all airborne fugitive dust plumes from leaving the project site, to prevent visible particulate matter from being deposited upon public roadways and shall

¹⁹USEPA and CARB have implemented regulations and a tiering system to reduce emissions from off-road equipment with increasing combustion efficiency (i.e., decreasing emissions) where Tier 1 is the least efficient (greatest emissions) and Tier 4 is the most efficient (least emissions). The regulations have been implemented over time such that Tier 1 was phased out in the 1990's and Tier 2 was required, followed by implementation of Tier 3 and Tier 4 by 2015 with a phase out of Tier 2.

adhere to the SCAQMD rules. The plan shall be subject to review and approval by the SCAQMD (Rule 403).

The following measures shall be included within the Fugitive Dust Control Plan:

- Prior to commencing construction, the applicant, its contractor, or its subcontractor shall designate and retain for the duration of construction a Dust Control Supervisor. The Dust Control Supervisor shall have successfully completed the SCAQMD Rule 403 dust control compliance training class. The Dust Control Supervisor shall have full access to all areas of construction on the project site, gen-tie line, and other linear facilities and shall have the authority to stop any or all construction activities as warranted by applicable construction mitigation conditions.
- During construction, all unpaved roads, disturbed areas (e.g., areas of scraping, excavation, backfilling, grading, and compacting), and loose materials generated during construction activities shall be stabilized with a non-toxic soil stabilizer or soil weighting agent or watered two times daily or as frequently as necessary to minimize fugitive dust generation. Non-water-based soil stabilizers shall be as efficient as or more efficient for fugitive dust control than CARB-approved soil stabilizers and shall not increase any other environmental impacts, including loss of vegetation, adverse odors, or emissions of ozone precursor ROG or VOC. The proposed soil stabilizing products shall be listed in the Plan and are subject to review and approval by Riverside County, BLM, and California Department of Fish and Wildlife (CDFW). Any soil stabilizers proposed shall be consistent with those recommended in the Stormwater Pollution Prevention Plan (SWPPP) and shall also be approved for use by the project's Restoration Specialist to ensure that the products would not impede restoration goals.
- The main access roads through the site shall be stabilized using water, soil binders, gravel, or equivalent methods, to provide a stabilized surface that is similar for the purposes of dust control to paving, that may or may not include a crushed rock (gravel or similar material with fines removed) top layer, prior to commencing construction. Delivery, laydown, and staging areas for construction or operations and maintenance supplies shall be paved or stabilized prior to taking initial deliveries.
- Grading and earthwork activities, including vegetation removal, cut and fill movement, and soil compacting, shall be phased across the site to minimize the amount of exposed or disturbed areas on any single day.
- No vehicle shall exceed 15 miles per hour on unpaved areas within the site, with the exception that vehicles may travel up to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions or conflict with other permit conditions.
- Visible speed limit signs shall be posted at the construction site entrances.

- All construction equipment vehicle tires shall be inspected and washed as necessary to be cleaned free of dirt prior to entering paved roadways.
- All unpaved exits from the construction site shall be graveled or treated to prevent track-out onto public roadways. No person shall allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation. All track out from an active operation shall be removed immediately if it extends over 25 feet or if under 25 feet, at the end of each workday.
- All paved roads within the construction site shall be swept daily or as needed (less during periods of precipitation) on days when construction activity occurs to prevent the accumulation of dirt and debris.
- At least the first 500 feet of any paved public roadway exiting the construction site or exiting other unpaved roads to access the construction site, or staging areas shall be swept as needed when dirt or runoff resulting from the construction activities is visible on the paved public roadway.
- Consistent with SCAQMD Rule 403(g)(2), regarding exemptions, contingency control measures may be implemented during “high wind” conditions, when instantaneous wind speeds exceed 25 miles per hour. The contingency measures for high wind events shall include 1) Cease all active operations; 2) Stop all vehicular traffic; 3) Apply water to soil not more than 15 minutes prior to moving such soil; 4) Apply chemical stabilizers prior to wind event; and/or 5) Apply water to all unstabilized disturbed areas 3 times per day, unless there is evidence of wind driven fugitive dust, then increase watering frequency to a minimum of four times per day.
- Install a gravel apron to reduce mud/dirt trackout from unpaved truck exit routes.
- Construct three-sided enclosures for storage piles.

AQ-3 Encourage Ridesharing and Carpooling. The applicant shall support and encourage ride sharing and transit incentives for the construction crew by providing crews with the resources needed to organize rideshares, such as bulletin boards or email announcements. The applicant shall also partially subsidize transit fares or passes for the construction crew members who can feasibly use transit.

AQ-4 Fugitive Dust Palliatives. If dust palliatives are used in place of water for the project, the total amount of water needed during construction would be reduced. The applicant may opt to use such palliatives, as authorized by the County for the project. The soil binder/dust palliatives that are proposed for the project, and which have been previously allowed in the region are:

- Road Bond 1000
- For roads and heavy traffic areas: Soil Sement
- For non-traffic areas on finer soils: Formulated Soil Binder FSB 1000

- For non-traffic areas on sandier/rockier soils: Plas-Tex Soil Stabilizer
- Alternatives as approved by the County

8.0 OPERATIONAL EMISSIONS INVENTORY

Operation-related emissions would be caused by upkeep, maintenance, inspections, security, and panel washing. These activities, necessary for routine upkeep of the solar facility and gen-tie lines, would involve up to ten permanent staff on the site. Mobile source emissions include those from vehicles used by staff and for occasional deliveries during O&M, and area sources reflect default assumptions for landscaping as a proxy for routine vegetation management. Occasional testing of the backup generator would cause stationary source emissions. The project would be required by general air district provisions to implement controls such as the use of water or chemical dust suppressants to minimize particulate matter emissions, to prevent visible emissions, and to avoid nuisances.

Emissions during O&M would be minor due to the limited number of crews and workers using equipment and vehicles around the site. The routine O&M emissions would not exceed the SCAQMD thresholds. With minimal direct emissions during operation, operation of the project would not result in a cumulatively considerable net increase of any criteria pollutant, and this impact would be less than significant.

Water pumps and diesel generators would be needed during operation as follows:

- During operations, a 40 hp (30 kW) water pump would be located at the O&M building.
- During operations, a 500 hp (375 kW) diesel or other fuel backup generator would be located at the O&M facility during operations. The main power source will come from the substation or a distribution line, but in the event of an outage the backup generator will provide power and is anticipated to operate for up to 200 hours per year for required routine testing purposes.

The pumps and generators would meet USEPA Tier 3 or 4 Exhaust Emissions Standards for Nonroad Compression-Ignition Engines Emission Standards and permitting requirements.

Table 14: Estimated Maximum Daily Operational Emissions provides the estimated maximum daily operational emissions that would be associated with the project and compares those emissions to the SCAQMD's significance thresholds. The maximum daily operational emissions would not exceed the SCAQMD's significance thresholds.

Table 14: Estimated Maximum Daily Operational Emissions (pounds)

Operation	VOC	CO	NOx	PM ₁₀	PM _{2.5}	SO ₂
Total	0.21	3.73	2.22	0.22	0.18	1.36
Significance Threshold	55	550	55	150	55	150
Significant (Yes or No)?	No	No	No	No	No	No

SOURCE: CARB EMFAC and OFFROAD

NOTE: Bold values represent exceedances of significance thresholds.

The project consists of a 150-MW solar power generating facility. The project would produce up to about 373,176 Megawatts-hours (MWh) of electricity each year for delivery to California’s end-users.²⁰ Some of the electricity produced would displace fuel-burning by California’s flexible natural gas-fired resources or electricity otherwise imported to California. This would avoid criteria pollutant emissions that could otherwise be emitted by fuel-burning power plants. Composite emission factors were estimated based on annual total emissions divided by total combustion net generation. Emission factors for SO₂ and NO_x were determined, as shown in **Table 15: Average Annual Combustion Output Emission Rate**.

Table 15: Average Annual Combustion Output Emission Rate (kilogram/MWh)

State	NO _x	O ₃ Season NO _x	SO ₂	PM ₁₀	PM _{2.5}
California	0.396	0.374	0.033	0.125	0.05

SOURCE: United States Environmental Protection Agency, *Emissions & Generation Resource Integrated Database (eGRID)*, 2022, <https://www.epa.gov/energy/emissions-generation-resource-integrated-database-egrid>

Note: Ozone season is typically April through September

Potential air emissions that could be offset by the project are compared with average emissions from combustion electric power systems for California to examine the importance of solar projects in reducing emissions that could be emitted by fossil-fueled power plants generating the same quantity of energy to meet demands. The project would offset a significant quantity of SO₂, NO_x, PM₁₀, and PM_{2.5} emissions compared to the equivalent amount of energy generated at a non-renewable power plant. The project would have a beneficial effect compared to generation of energy using non-renewable resources. **Table 16: Annual Operational Criteria Pollutant Emissions Offset Emission Rate** presents the annual operational criteria pollutant emissions offset, which are greater (i.e., overall benefit) than the temporary construction emissions shown in **Table 12: Estimated Annual Construction Emissions**.

Table 16: Annual Operational Criteria Pollutant Emissions Offset (tons)

NO _x	O ₃ Season NO _x	SO ₂	PM ₁₀	PM _{2.5}
73.9	69.8	6.16	51.4	20.6

9.0 AMBIENT AIR QUALITY ANALYSIS

An LST analysis has been prepared to determine potential impacts to nearby sensitive receptors during construction of the project. As indicated in the discussion of the thresholds of significance, the SCAQMD recommends the evaluation of localized NO₂, CO, PM₁₀, and PM_{2.5} impacts as a result of construction

²⁰ A 1-MW solar facility generates electricity only during the sunshine hours, which varies dependent upon the location. Sun is available only between 7 AM and 7 PM, and even during this period, peak sunshine is available only for several hours. As a result, what 1-MW of solar panels can produce during a day is much less than 24 MWh. The capacity factor of a utility scale solar facility accounts for how much energy is produced compared with the theoretical maximum output, which accounts for the number of sunshine hours. On average in California, solar facilities have a capacity factor of 28.4 percent and generate approximately 7 MWh of electricity per day or 2,435 MWh of electricity per year. A 250-MW solar facility would produce approximately 150-MW * 8,760 hours per year * 28.4 percent capacity factor = 373,176 MWh of electricity per year.

activities to sensitive receptors in the immediate vicinity of the project site.²¹ Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes.

The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology. According to the Final Localized Significance Threshold Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs". Hauling of construction materials associated with project construction are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways. Emissions from the trucks would be relatively brief in nature and would cease once the trucks pass through the main streets.

For emissions from sites that are near sensitive receptors, SCAQMD developed the LSTs to evaluate whether a mass emission rate from a project may generate significant adverse localized air quality impacts. The LSTs may be used by lead agencies as a way of indicating whether a project could locally exceed the ambient air quality standards at a given distance from the site boundary. The LSTs vary depending on the meteorological conditions for each "Source Receptor Area" within the SCAQMD jurisdiction. East Riverside County is SCAQMD "Source Receptor Area or SRA" zone 31.

Construction activities associated with the project would result in temporary sources of on-site fugitive dust and construction equipment emissions. Off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis. The maximum allowable daily emissions that would satisfy the SCAQMD localized significance criteria for SRA 31 are compared to the maximum daily on-site construction emissions generated during the project.

Table 17: SCAQMD Localized Significance Emissions provides the estimated maximum daily LST emissions that would be associated with the project construction and compares those emissions to the SCAQMD's significance thresholds. Because on-site construction emissions of criteria air pollutants would be below all applicable LSTs, project construction would not cause onsite construction emissions to exceed the ambient air quality standards and localized pollutant impacts would be less than significant.

²¹ South Coast Air Quality Management District, SCAQMD Localized Significance Thresholds, Appendix C - Mass Rate LST Look-up Tables, October 2009, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

Table 17: SCAQMD Localized Significance Emissions (pounds)

Pollutant	Construction			Unmitigated	Mitigated
Distance from Sources (meters)	100	200	500	2026	
NO _x	425	547	875	59.2	28.9
PM ₁₀	67	112	248	15.7	7.04
PM _{2.5}	19	37	128	4.18	1.41
CO	5,331	10,178	31,115	68.9	134
Distance from Sources (meters)	100	200	500	2027	
NO _x	425	547	875	49.5	26.8
PM ₁₀	67	112	248	15.2	6.97
PM _{2.5}	19	37	128	3.78	1.34
CO	5,331	10,178	31,115	63.5	119

Source: South Coast Air Quality Management District, SCAQMD Localized Significance Thresholds, Appendix C - Mass Rate LST Look-up Tables, October 2009, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

Note: Bold values represent exceedances of significance thresholds. These LSTs are for sites of five acres. East Riverside County is SCAQMD "Source Receptor Area" zone 31.

Valley Fever. Soils in some areas of California host microscopic fungus that causes Valley Fever, which lives in the top two to 12 inches of soil in many parts of the state. When soil is disturbed by activities such as digging, driving, or high winds, fungal spores can become airborne and potentially be inhaled. People who become sick with Valley Fever (also called *coccidioidomycosis*) can experience respiratory symptoms including cough, fever, chest pain, and tiredness. Most people (about six in ten) who are infected with Valley Fever have no symptoms, and their bodies will fight off the infection naturally. When compared with COVID-19, which shares many of the same symptoms, laboratory tests and usually a blood test are required in order to know whether the Valley Fever fungus has infected the lungs.²²

Workers in Riverside County are at a relatively lower risk for Valley Fever than in other areas of California. Based on yearly data published by the Infectious Diseases Branch of the California Department of Public Health, California has experienced a trend of higher numbers of cases, with statewide average incidence rates between 18.2 to 22.9 per 100,000 of population during the five most-recent years of records from 2017 to 2021.²³

For individuals on the construction site, employers have a legal responsibility to provide workers with protection from health risks, including any risks due to Valley Fever. The primary ways to reduce the risk of Valley Fever are to avoid exposure to dusty air or dust storms, prevent dirt or dust from becoming airborne, and, if working at a dusty site is unavoidable, wear respiratory protection with particulate filters

²² Department of Industrial Relations, Protection from Valley Fever, January 18, 2024, <https://www.dir.ca.gov/dosh/valley-fever-home.html>

²³ Department of Industrial Relations, Protection from Valley Fever, January 18, 2024, <https://www.dir.ca.gov/dosh/valley-fever-home.html>

rated as N95 or higher. Project construction activities would be subject to stringent dust control requirements (including SCAQMD Rule 403). These mandatory controls would avoid exposing construction workers and the off-site population to substantial concentrations of dust, to ensure that the impact of potential exposure to Valley Fever would be less than significant.

Visibility and Federal Class I Areas. Under the federal CAA, Class I areas are provided with the greatest protection. The nearest boundary of the Joshua Tree National Park (JTNP) Class I area is located seven miles from the project boundary. Ambient air quality impacts of the project including increased concentrations of airborne dust, including PM₁₀ and PM_{2.5}, and NOx emissions could impact visibility. However, the sources of emissions during construction would occur near the ground level, where dust would have a limited ability to notably affect distant vistas, and emissions would be widely dispersed across the project site. The near-ground release and intermittent nature of construction sources ensures that the concentration near the JTNP would be much lower than the localized effects near the project activities. Additionally, all cumulative projects are anticipated to avoid visible plumes and control dust as required by SCAQMD Rule 401 and Rule 403. Projects subject to the CEQA process would also implement additional mitigation measures where needed to control dust. Controlling construction emissions as required by local rules and regulations and identified through mitigation measures ensures that users of the JTNP would not experience substantial concentrations of pollutants, and the impact to visibility would be less than significant.

10.0 HEALTH IMPACTS

In addition to criteria air pollutants, HAP are also evaluated. HAP (such as acetaldehyde, formaldehyde, benzene, toluene, and xylene) are gaseous organic and inorganic chemicals and PM which the USEPA has identified to have known or suspected potential to cause cancer or other serious health effects. HAP are emitted by a wide range of sources, including construction equipment and industrial facilities. The CAA mandates that the USEPA regulates HAP emissions. While there are currently no ambient (i.e., outdoor) standards for HAP emission levels, standards do exist for the level of HAP emissions emitted by stationary sources. HAP emissions are calculated based on speciation factors which are essentially the percentage of an individual HAP within the total VOC emissions from construction equipment and vehicles. The following measures are required by state law to reduce diesel particulate emissions:

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-Use Off-Road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, Section 2449), the purpose of which is to reduce DPM and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.
- All commercial diesel vehicles are subject to Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

The greatest potential for TAC emissions during construction would be DPM emissions from heavy equipment operations and heavy-duty trucks during construction of the Project and the associated health impacts to sensitive receptors. There are no sensitive receptors within ½ mile (2,640 feet) of the project

site. The Palm Nursery is located adjacent to the project site but does not contain continuous workers. The maximum daily PM₁₀ or PM_{2.5} emissions generated by construction equipment operation and from hauling of soil during grading (exhaust particulate matter, or DPM), combined with fugitive dust generated by equipment operation, would be well below the SCAQMD significance thresholds after mitigation. During operation, the project would include minimal sources of TAC emissions, including use of pressure washers once annually for panel washing and use of water trucks for periodic water deliveries to the site. Given the minor increase in emissions and distance to the closest receptor (i.e., over 2,000 feet), operational activities are not expected to be a significant source of DPM or associated potential health impacts. Therefore, the impact would be less than significant.

Table 18: Annual Construction Emissions of HAP without Controls shows the estimated annual HAP emissions for all construction-related emissions for the project without combustion controls. Because the calculated emission rates for HAP emissions were miniscule, the potential for increased acute and/or long-term health impacts resulting from HAP emissions from the reasonably foreseeable development activities are expected to be insignificant. The potential to emit HAP would be less than 10 tons per year for any individual HAP and less than 25 tons per year for all HAP combined. Therefore, the facility would not be a major HAP source.

Table18: Annual Construction Emissions (tons) of HAP without Controls

Pollutant	2026	2027
1,3-butadiene	0.0008	0.0006
2,2,4-Trimethylpentane	0.0035	0.0026
Acetaldehyde	0.0446	0.0330
Acrolein	0.0082	0.0060
Benzene	0.0217	0.0161
Ethylbenzene	0.0021	0.0015
Formaldehyde	0.1245	0.0922
Hexane	0.0002	0.0001
Naphthalene	0.0020	0.0014
Propionaldehyde	0.1061	0.0786
Toluene	0.0158	0.0117
Xylene	0.0065	0.0048
Polycyclic Organic Matter	0.0020	0.0015
Total	0.3380	0.2502

SOURCE: CARB EMFAC and OFFROAD

Table 19: Annual Construction Emissions of HAP with Controls shows the estimated annual HAP emissions for all construction-related emissions for the project with combustion controls.

Table19: Annual Construction Emissions (tons) of HAP with Controls

Pollutant	2026	2027
1,3-butadiene	0.0006	0.0004
2,2,4-Trimethylpentane	0.0025	0.0018
Acetaldehyde	0.0322	0.0235
Acrolein	0.0059	0.0043
Benzene	0.0157	0.0114
Ethylbenzene	0.0015	0.0011
Formaldehyde	0.0898	0.0656
Hexane	0.0001	0.0001
Naphthalene	0.0014	0.0010
Propionaldehyde	0.0766	0.0559
Toluene	0.0114	0.0083
Xylene	0.0047	0.0034
Polycyclic Organic Matter	0.0014	0.0011
Total	0.2438	0.1780

SOURCE: CARB EMFAC and OFFROAD

Land uses such as schools, children’s daycare centers, hospitals, and convalescent homes are more sensitive than the general public to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress. People engaged in strenuous work or exercise also have increased sensitivity to poor air quality. The CARB has identified the following people as most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and those with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive population groups. There are no sensitive receptors such as residences and schools within ¼ miles of the project site, and thus, a health risk assessment was not conducted, and health impacts would be less than significant.

CO Hot Spot. A CO “hot spot” would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur.

The SCAQMD conducted a CO hot spot analysis as part of the 1992 CO Federal Attainment Plan at four busy intersections in Los Angeles County during the peak morning and afternoon time periods. The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day. Despite this level of traffic, the CO analysis concluded that there was no violation of CO standards. In order to establish a more accurate record of baseline CO concentrations affecting Los Angeles, a CO “hot spot” analysis was conducted in 2003 at the same four busy intersections in Los Angeles at the peak morning and afternoon time periods. This “hot spot” analysis did not predict any violation of CO standards. The BAAQMD, the air pollution control officer for the San Francisco Bay Area, concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact.

The proposed project is expected to result in no more than 1,000 daily trips during construction activities and ten daily operational traffic trips. Thus, the project would not generate traffic volumes at any intersection of more than 100,000 vehicles per day (or 44,000 vehicles per day) and there is no likelihood of the project traffic exceeding CO values. Secondly, the project would implement delay reduction measures including working with nearby and concurrent developments to stagger arrival/departure times and peak construction periods and/or the potential installation of temporary traffic control during the busiest periods of the project's construction.

In summary, construction and operation of the proposed project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

11.0 ODOR IMPACTS

Though offensive odors from stationary and mobile sources rarely cause any physical harm, they remain unpleasant and can lead to public distress, generating citizen complaints to local governments. The occurrence and severity of odor impacts depend on nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors. Generally, odor emissions are highly dispersive, especially in areas with higher average wind speeds. However, odors disperse less quickly during inversions or during calm conditions, which hamper vertical mixing and dispersion.

The potential for the project to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the project's (long-term operational) uses. Standard construction requirements would minimize odor impacts. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the county's solid waste regulations. The project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the project construction and operations would be less than significant and no mitigation is required.

12.0 CUMULATIVE IMPACTS

Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355). Stated in another way, "a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated together with other projects causing relating impacts" (CEQA Guidelines Section 15130 [a][1]). For this air quality analysis, cumulative projects include Lycan Solar, Calypso I Solar, Sapphire Solar, Easley Renewable Energy Project, Redonda Solar Project, and Bajada Solar Project:

- Redonda Solar Project consists of up to a nominal 200-megawatt solar photovoltaic power generating facility. The Redonda Solar Project site will be on up to 868 acres of federal land managed by Bureau of Land Management (BLM) in the Chuckwalla Valley in Riverside County, California, and to the southeast and adjacent to the Savira Solar Project (proposed project). Redonda Solar Project would be constructed from June of 2026 through August of 2027 (15 months); and, therefore, entirely overlapping with the Savira Solar Project construction period.
- Easley Renewable Energy Project would generate up to 400 MW and store up to 650 MW of electricity from solar photovoltaic panels on approximately 3,735 acres in Riverside County, California, approximately two miles north of the town of Desert Center, California. The Easley Renewable Energy Project construction is from 2025 to 2026. Therefore, a portion but not all of the Easley Renewable Energy Project construction activities would overlap with the proposed project.
- Sapphire Solar Project would include up to 117 MW of solar generation. The Sapphire Solar Project site is located approximately three miles north of Desert Center. The Sapphire Solar Project would be constructed in 2025 and into 2026. Therefore, a portion but not all of the Sapphire Solar Project construction activities would overlap with the proposed project.
- Bajada Solar Project consists of up to a nominal 350-megawatt solar photovoltaic power generating facility. The Bajada Solar Project site will be on up to 2,600 acres of federal land managed by Bureau of Land Management (BLM) in the Chuckwalla Valley in Riverside County, California, and approximately 4 miles to the southeast of the Savira Solar Project (proposed project). Bajada Solar Project would be constructed from January of 2028 through August of 2029 (20 months); and, therefore, the Bajada Solar Project would begin construction after the completion of the Savira Solar Project construction period.
- At this time, detailed Information for Lycan Solar and Calypso I Solar was not publicly available.

Table 20: List of Cumulative Projects provides a list of nearby cumulative projects. The Environmental Impact Reports for the Sapphire Solar and Easley Renewable Energy Projects are publicly available and emissions estimates from those documents were included in the cumulative analysis.^{24 25} Information for the Redonda Solar Project, being developed adjacent and concurrently with the Savira Solar Project, and the Bajada Solar Project, were also included in the cumulative analysis. **Figure 4: Cumulative Projects** shows the location of the cumulative projects.

Cumulative impacts would exist when either direct air quality impacts or multiple construction projects occur within the same area simultaneously. If a project were to produce air quality emissions simultaneously to a nearby construction project, the addition of both project emissions to the environment could exceed significance thresholds. For this project, the construction activities were found to be less than significant. If a nearby project was to be under construction at the same time, that project

²⁴ Sapphire Solar Project Draft Environmental Impacts Report, August 2024

²⁵ Easley Renewable Energy Project, Final Environmental Impact Report, August 2024

would need to produce an additional amount of emissions close to the project site such that emissions would exceed thresholds.

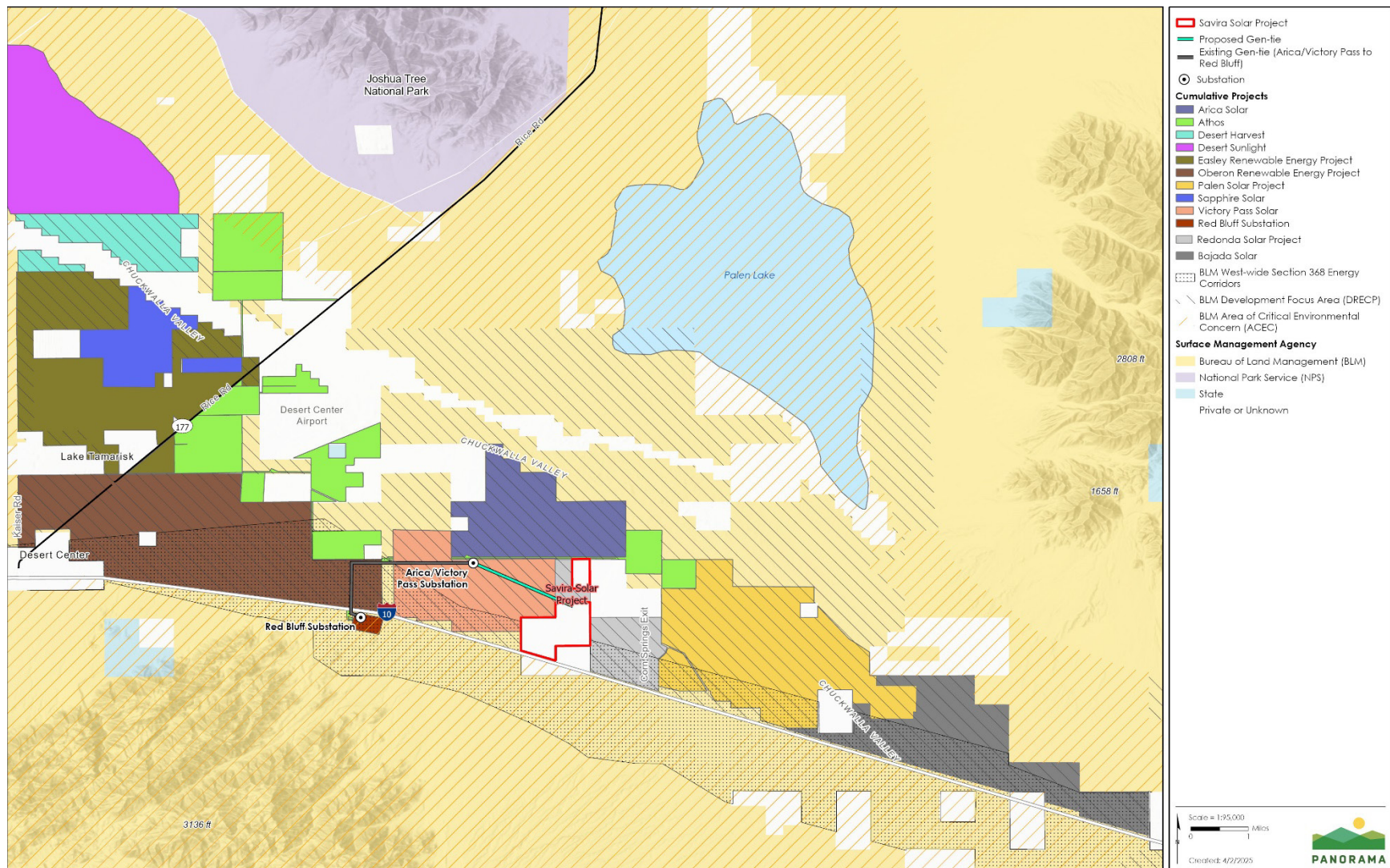
In analyzing cumulative impacts from a project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the project area is listed as "non-attainment" for the federal or state AAQS. In the event direct impacts from a project are less than significant, a project may still have a cumulatively considerable impact on air quality if the emissions from the project, in combination with the emissions from other proposed, or reasonably foreseeable future projects are in excess of mass daily emission thresholds, and the project's contribution accounts for more than an insignificant proportion of the cumulative total emissions.

Table 20: List of Cumulative Projects

Project Name	Construction Start	Construction Duration (years)	Size (acres)
Arica Solar Project	Operational	-	2,000
Victory Pass Solar Project	Operational	-	1,800
Oberon Renewable Energy Project	Operational	-	5,000
Palen Solar Project	Operational	-	3,140
Desert Harvest	Operational	-	1,208
Desert Sunlight	Operational	-	4,144
Athos	Operational	-	3,440
Lycan Solar Project	2024-2025	<2	6,944
Calypso I Solar Project	2024-2025	<2	3,271
Easley Renewable Energy Project	2025 - 2026	2	3,727
Sapphire Solar Project	2025-2027	1.5	1,140
Redonda Solar Project	2026-2027	<2	868
Bajada Solar Project	2028-2029	<2	2,600

The project area is designated as unclassified/attainment area for all of the NAAQS. The project area is designated as moderate nonattainment area for the CAAQS for ozone and PM₁₀. The area is designated as unclassified/attainment for all CAAQS for the other criteria pollutants.

Figure 4 Cumulative Projects



The SCAQMD *CEQA Air Quality Handbook* states: “[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the SCAQMD.” According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD’s recommended daily thresholds for project specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants.

Table 21: Estimated Maximum Daily Cumulative Construction Emissions – Savira Plus Redonda and Bajada provides the estimated maximum cumulative (i.e., Savira plus Redonda and Bajada Solar Projects) daily emissions and compares those emissions to the SCAQMD’s significance thresholds. The unmitigated maximum daily cumulative emissions of NO_x, PM₁₀, and PM_{2.5} exceed the SCAQMD’s significance thresholds due to combustion equipment and fugitive dust producing activities such as unpaved road travel. The mitigated maximum daily cumulative emissions are less than the SCAQMD’s significance thresholds. Notably, the mitigated maximum daily emissions for the Savira Solar Project (i.e., Proposed Action) are also less than the SCAQMD’s significance thresholds. The construction impacts on air quality would be temporary, during limited time periods and affect a small geographical area. Therefore, the project would not result in a cumulatively considerable net increase of criteria pollutants.

Table 21: Estimated Maximum Daily Cumulative Construction Emissions (pounds) – Savira Plus Redonda and Bajada

Construction Year	VOC	CO	NO _x	PM ₁₀	PM _{2.5}	SO ₂
Unmitigated						
2026	24.4	341	180	607	68.5	1.15
2027	17.1	271	124	554	61.0	0.95
2028	13.5	204	80.6	872	90.3	0.72
2029	9.67	191	58.5	871	90.1	0.69
Significance Threshold	75	550	100	150	55	150
Significant (Yes or No)?	No	No	Yes	Yes	Yes	No
Mitigated						
2026	17.2	541	95.7	65.5	9.20	1.29
2027	12.3	385	73.9	59.9	8.04	1.08
2028	11.2	342	61.7	87.7	10.2	0.72
2029	7.85	256	47.0	87.7	10.2	0.69
Significance Threshold	75	550	100	150	55	150
Significant (Yes or No)?	No	No	No	No	No	No

SOURCE: CARB EMFAC and OFFROAD

NOTE: Bold values represent exceedances of significance thresholds.

Table 22: Estimated Average Daily Cumulative Construction Emissions – Savira Plus Redonda and Bajada provides the estimated average cumulative (i.e., Savira plus Redonda and Bajada Solar Projects) daily emissions and compares those emissions to the SCAQMD’s significance thresholds (for informational purposes only). The unmitigated average cumulative daily emissions of PM₁₀ exceed the SCAQMD’s

significance thresholds. The mitigated average daily cumulative emissions would not exceed the SCAQMD's significance thresholds.

Table 22: Estimated Average Daily Cumulative Construction Emissions (pounds) – Savira Plus Redonda and Bajada

Construction Year	VOC	CO	NOx	PM ₁₀	PM _{2.5}	SO ₂
Unmitigated						
2026	9.87	131	72.5	197	22.9	0.42
2027	5.72	81.4	42.6	145	16.4	0.28
2028	8.01	128	48.2	450	47.4	0.45
2029	2.45	55.4	15.4	272	28.0	0.20
Significance Threshold	75	550	100	150	55	150
Significant (Yes or No)?	No	No	No	Yes	No	No
Mitigated						
2026	7.12	212	42.5	21.9	3.23	0.47
2027	4.07	116	25.6	16.6	2.30	0.33
2028	6.76	206	40.8	48.0	5.85	0.45
2029	2.01	66.3	12.2	27.3	3.13	0.20
Significance Threshold	75	550	100	150	55	150
Significant (Yes or No)?	No	No	No	No	No	No

SOURCE: CARB EMFAC and OFFROAD

NOTE: Bold values represent exceedances of significance thresholds.

Table 23: Estimated Maximum Daily Cumulative Construction Emissions – Easley and Sapphire provides the estimated maximum daily cumulative construction emissions that would be associated with the Easley Renewable Energy Project and Sapphire Solar Project.²⁶ As individual projects, the maximum mitigated daily construction emissions for Easley Renewable Energy Project and Sapphire Solar Project was determined to be less than significant.

Table 23: Estimated Maximum Daily Cumulative Construction Emissions (pounds) – Easley and Sapphire

Project	Construction Year	VOC	CO	NOx	PM ₁₀	PM _{2.5}	SO ₂
Unmitigated							
Easley	Year 1	27.3	304	175	280	43.1	0.85
Sapphire	Year 1	40.1	426	356	291	50.3	0.69
Easley	Year 2	51.0	326	182	280	43.4	0.83
Sapphire	Year 2	15.3	195	120	261	32.4	0.28
Significance Threshold		75	550	100	150	55	150
Significant (Yes or No)?		No	No	Yes	Yes	No	No
Mitigated							

²⁶ Savira Solar Project is approximately 6.3 miles to the southeast of the Easley Renewable Energy Project and 7.2 miles to the southeast of the Sapphire Solar Project.

Easley	Year 1	16.2	315	92.7	77.8	18.3	0.85
Sapphire	Year 1	11.1	382	92.4	77.6	17.1	0.59
Easley	Year 2	39.8	337	99.4	78.1	18.5	0.83
Sapphire	Year 2	8.81	185	83.5	61.7	10.4	0.25
Significance Threshold		75	550	100	150	55	150
Significant (Yes or No)?		No	No	No	No	No	No

SOURCE: Easley Renewable Energy Project, Final Environmental Impact Report, August 2024 and Sapphire Solar Project Draft Environmental Impacts Report, August 2024.

NOTE: Bold values represent exceedances of significance thresholds.

Implementation of mitigation measures would reduce potential construction-related project's daily emissions. The mitigated project's maximum daily emissions would not exceed the SCAQMD's significance thresholds (see **Table 10: Estimated Maximum Daily Construction Emissions**), cumulative air quality impacts from the construction of nearby projects would also be less than significant.

During operations of the Savira Solar Project, the project's daily criteria pollutant emissions would not exceed SCAQMD thresholds for all pollutants. As such, impacts from the project operations would be less than significant and would not result in a cumulatively considerable increase in air emissions during operations.

Based on SCAQMD methodology, the project's construction emissions would not represent a cumulatively considerable contribution, and thus the project would result in a cumulatively less than significant impact.

13.0 GREENHOUSE GAS EMISSIONS

"Global warming" and "global climate change" are the terms used to describe the increase in the average temperature of the earth's near-surface air and oceans since the mid-20th century and its projected continuation. Warming of the climate system is now considered to be unequivocal, with global surface temperature increasing approximately 1.33 degrees Fahrenheit (°F) over the last 100 years. Continued warming is projected to increase global average temperature between 2 and 11°F over the next 100 years.

Natural processes and human actions have been identified as the causes of this warming. The Intergovernmental Panel on Climate Change (IPCC) concludes that variations in natural phenomena such as solar radiation and volcanoes produced most of the warming from pre-industrial times to 1950 and had a small cooling effect afterward.²⁷ After 1950, however, increasing GHG concentrations resulting from human activity such as fossil fuel burning, and deforestation have been responsible for most of the observed temperature increase. These basic conclusions have been endorsed by more than 45 scientific societies and academies of science, including all the national academies of science of the major industrialized countries. Since 2007, no scientific body of national or international standing has maintained a dissenting opinion.

²⁷ International Panel on Climate Change, 2014: *Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, https://www.ipcc.ch/site/assets/uploads/2018/05/SYR_AR5_FINAL_full_wcover.pdf

Increases in GHG concentrations in the earth's atmosphere are thought to be the main cause of human-induced climate change. GHG naturally trap heat by impeding the exit of solar radiation that has hit the earth and is reflected back into space.²⁸ Some GHG occurs naturally and are necessary for keeping the earth's surface inhabitable. However, increases in the concentrations of these gases in the atmosphere during the last 100 years have decreased the amount of solar radiation that is reflected back into space, intensifying the natural greenhouse effect and resulting in the increase of global average temperature.

Gases that trap heat in the atmosphere are referred to as GHG because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHG has been implicated as the driving force for global climate change. The primary GHG are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), ozone, and water vapor.

While the presence of the primary GHG in the atmosphere are naturally occurring, CO₂, CH₄, and N₂O are also emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHG include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes.

CO₂ is the reference gas for climate change because it is the predominant GHG emitted. The effect that each of the aforementioned gases can have on global warming is a combination of the mass of their emissions and their global warming potential (GWP). GWP indicates, on a pound-for-pound basis, how much a gas is predicted to contribute to global warming relative to how much warming would be predicted to be caused by the same mass of CO₂. CH₄ and N₂O are substantially more potent GHG than CO₂, with GWP of 25 and 298 times that of CO₂, respectively.²⁹

In emissions inventories, GHG emissions are typically reported in terms of pounds or metric tons (MT) of CO₂ equivalents (CO₂e). CO₂e are calculated as the product of the mass emitted of a given GHG and its specific GWP. While CH₄ and N₂O have much higher GWP than CO₂, CO₂ is emitted in such vastly higher quantities that it accounts for the majority of GHG emissions in CO₂e.

Fossil fuel combustion, especially for the generation of electricity and powering of motor vehicles, has led to substantial increases in CO₂ emissions (and thus substantial increases in atmospheric concentrations of CO₂). In pre-industrial times (c. 1860), concentrations of atmospheric CO₂ were approximately 280 parts per million (ppm). By August of 2024, atmospheric CO₂ concentrations had increased to 422.9 ppm, 55 percent above pre-industrial concentrations.³⁰

There is international scientific consensus that human-caused increases in GHG have and will continue to contribute to global warming. Potential global warming impacts in California may include, but are not

²⁸ International Panel on Climate Change, 2014: *Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, https://www.ipcc.ch/site/assets/uploads/2018/05/SYR_AR5_FINAL_full_wcover.pdf

²⁹ Global Warming Potential values, https://www.ghgprotocol.org/sites/default/files/ghgp/Global-Warming-Potential-Values%20%28Feb%2016%202016%29_1.pdf

³⁰ Earth System Research Laboratory, *Recent Monthly Mean CO₂ at Mauna Lora*, www.esrl.noaa.gov/gmd/ccgg/trends/

limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.³¹

California Environmental Quality Act and Climate Change

Under CEQA, lead agencies are required to disclose the reasonably foreseeable adverse environmental effects of projects they are considering for approval. GHG emissions have the potential to affect the environment because they contribute to global climate change. In turn, global climate change has the potential to cause sea level rise, alter rainfall and snowfall patterns, and affect habitat.

Pavley Standards

California AB 1493 (Pavley) enacted on July 22, 2002, required the CARB to develop and adopt regulations that reduce greenhouse gases emitted by passenger vehicles and light duty trucks for model years 2009–2016, which are often times referred to as the “Pavley I” standards. The CARB obtained a waiver from USEPA that allows for implementation of these regulations notwithstanding possible federal preemption concerns.

Executive Order S-3-05

Governor Schwarzenegger established Executive Order S-3-05 in 2005, in recognition of California’s vulnerability to the effects of climate change. Executive Order S-3-05 set forth a series of target dates by which statewide emissions of GHG would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The executive order directed the Secretary of CalEPA to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary will also submit biannual reports to the governor and California Legislature describing the progress made toward the emissions targets, the impacts of global climate change on California’s resources, and mitigation and adaptation plans to combat these impacts. To comply with the executive order, the secretary of CalEPA created the California Climate Action Team, made up of members from various state agencies and commissions. The report proposed to achieve the targets by building on the voluntary actions of California businesses, local governments, and communities and through state incentive and regulatory programs.

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

California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 established regulatory, reporting, and market

³¹ California Environmental Protection Agency, *2006 Final Climate Action Team Report to the Governor and Legislature*, March 2006, https://planning.lacity.org/eir/8150Sunset/References/4.E.%20Greenhouse%20Gas%20Emissions/GHG.23_CalEPA%202006%20Report%20to%20Governor.pdf

mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 required that statewide GHG emissions be reduced to 1990 levels by 2020. This reduction was to be accomplished by enforcing a statewide cap on GHG emissions that were to be phased in starting in 2012. To effectively implement the cap, AB 32 directed CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. AB 32 specified that regulations adopted in response to AB 1493 were used to address GHG emissions from vehicles. However, AB 32 also included language stating that if the AB 1493 regulations cannot be implemented, then CARB was to develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 required CARB to adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrived at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state reduces GHG emissions enough to meet the cap. AB 32 also includes guidance on instituting emissions reductions in an economically efficient manner, along with conditions to ensure that businesses and consumers are not unfairly affected by the reductions. Pursuant to AB 32, CARB identified 427 million MT CO₂e as the total Statewide aggregated 1990 GHG emissions level, which serves as the 2020 emissions limit. Using these criteria to reduce statewide GHG emissions to 1990 levels by 2020 represented an approximate 25 to 30 percent reduction in current emissions levels. However, CARB also had discretionary authority to seek greater reductions in more significant and growing GHG sectors, such as transportation, as compared to other sectors that are not expected to significantly increase emissions. The goals of AB 32 were achieved within the 2002 timeline.

Climate Change Scoping Plans

AB 32 also required CARB to develop a Scoping Plan that describes the approach California will take to reduce GHG to achieve the goal of reducing emissions to 1990 levels by 2020. The Scoping Plan was first approved by CARB in 2008 and must be updated every five years. The initial AB 32 Scoping Plan contains the main strategies California will use to reduce the GHG that cause climate change. The initial Scoping Plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 program implementation fee regulation to fund the program. In August 2011, the initial Scoping Plan was approved by CARB.

The 2013 Scoping Plan Update builds upon the initial Scoping Plan with new strategies and recommendations. The 2013 Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The 2013 Update defines CARB climate change priorities for the next five years and sets the groundwork to reach California's long-term climate goals set forth in Executive Orders S-3-05 and B-16-2012. The 2013 Update highlights California progress toward meeting the near-term 2020 GHG emission reduction goals defined in the initial Scoping Plan. In the 2013 Update, nine key focus areas were identified (energy, transportation, agriculture, water, waste management, and natural and working lands), along with short-lived climate pollutants, green buildings, and the cap-and-trade program.

On May 22, 2014, the First Update to the Climate Change Scoping Plan was approved by CARB, along with the finalized environmental documents. The First Update to the Climate Change Scoping Plan identified

the 2020 emissions limit as 431 million metric tons of CO₂e and the 2020 business-as-usual forecast as 509 million metric tons of CO₂e. Finally, the Updated Scoping Plan provided recommendations for establishing a mid-term emissions limit that aligns with the long-term (2050) goals of Executive Order S-3-05. The recommendations covered energy, transportation, agriculture, water, waste management, natural and working lands, short-lived climate pollutants, green building, and cap-and-trade sectors.

In 2017, CARB approved the Second Update to the Climate Change Scoping Plan (2017 Scoping Plan). The 2017 Scoping Plan identified progress made to meet the near-term (2020) objectives of AB 32 and defined California's climate change priorities and activities for the next several years. The 2017 Scoping Plan identified the 2020 emissions limit as 431 million metric tons of CO₂e and the 2020 business-as-usual forecast as 509 million metric tons of CO₂e. The 2017 Scoping Plan provided strategies for meeting the mid-term 2030 greenhouse gas reduction target set by Senate Bill (SB) 32. The 2017 Scoping Plan also identified how the State can substantially advance toward the 2050 greenhouse gas reduction target of Executive Order S-3-05, which consists of reducing greenhouse gas emissions to 80 percent below 1990 levels. The recommendations covered the key sectors, including energy and industry; transportation; natural and working lands; waste management; and water.

In 2022, CARB approved the Third Update to the Climate Change Scoping Plan (2022 Scoping Plan), which lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279.³² The 2022 Scoping Plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of natural and working lands to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.

³² California Air Resources Board, *Final 2022 Scoping Plan Update*, November 16, 2022, <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan#:~:text=The%20Draft%202022%20Scoping%20Plan,neutrality%20no%20later%20than%202045>

- Identifies key implementation actions to ensure success.

The recommended measures in the 2022 Scoping Plan and previous Scoping Plans are broad policy and regulatory initiatives that will be implemented at the State level and do not relate to the construction and operation of individual projects.

Federal Vehicle Standards

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the USEPA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014 through 2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the USEPA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO₂ emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program. On September 27, 2019, the USEPA and the NHTSA published the “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program.” (84 Fed. Reg. 51,310 (Sept. 27, 2019).) The Part One Rule revokes California’s authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the USEPA finalized rulemaking for SAFE Part Two, which sets CO₂ emissions standards and corporate average fuel economy standards for passenger vehicles and light duty trucks, covering model years 2021 through 2026.

California Renewables Portfolio Standard Program

In 2002, a California State law established the basic policy framework for the increased use of renewable energy resources in California, known as the Renewables Portfolio Standard (RPS). RPS requires renewable energy resources to serve a certain percentage of electricity sales by all electricity utilities in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. Major eligible renewable energy resources, as defined by the California Energy Commission (CEC), include biomass, geothermal, solar, wind, and small hydroelectric facilities. CEC and the California Public Utilities Commission (CPUC) work collaboratively to implement RPS.³³

Electric utilities in California must procure a minimum quantity of sales from eligible renewable energy resources as specified by RPS requirements. To integrate renewable generators on the grid, optimize the delivery of growing amounts of renewable energy production, and facilitate achieving the targeted GHG

³³ California Air Resources Board, Enforcement of the Renewables Portfolio Standard, <https://ww2.arb.ca.gov/enforcement-renewables-portfolio-standard>

reductions, the California legislature has also authorized energy agencies to establish energy storage procurement targets.

The Clean Energy and Pollution Reduction Act of 2015 [Senate Bill 350 (SB 350)] established California's state policy objectives on long-term energy planning and procurement as signed into law on October 7, 2015. The 100 Percent Clean Energy Act of 2018 [Senate Bill 100 (SB 100)] revised the RPS targets to establish the policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045.

With SB 350 and SB 100, California's objectives include:

- To set the RPS for the procurement of California's electricity from renewable sources at 33 percent by 2020, 50 percent by 2026, and 60 percent by 2030;
- To plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045; and
- To double the energy efficiency savings on electricity and natural gas end uses by retail customers by 2030.

California State legislation have steadily increased the renewable energy target, most recently from SB 100 (September 2018) which increased the RPS targets to 60 percent of California's electricity by 2030 and 100 percent of all retail electricity sold in California by 2045.

County of Riverside Climate Action Plan

The County of Riverside published a Climate Action Plan (CAP) Update, in November 2019, to present the current GHG inventory, forecasts and targets for the County of Riverside.³⁴ The CAP includes GHG inventories of community-wide and municipal sources based on the data available for the year 2017. The County's 2017 inventory amounted to 4.9 million metric tons of CO₂e for activities within the unincorporated communities served by the County of Riverside, as well as County government operations.

The Climate Action Plan Update identifies various policies to promote renewable energy as a means of achieving GHG emissions reductions. The County General Plan includes one policy directly relevant to the project:

Policy AQ 20.19. Facilitate development of renewable energy facilities and transmission lines in appropriate locations.

The project, a solar generation and energy storage facility, is consistent with this policy.

Riverside County has determined the development size that would be too small to be able to provide the level of GHG emission reductions expected from the Screening Tables or the alternative emission analysis method within the CAP. To do this Riverside County determined the GHG emissions allowed by a project

³⁴ County of Riverside, Climate Action Plan Update, November 2019, <https://planning.rctlma.org/general-plan-and-zoning/riverside-county-climate-action-plan>

such that 90 percent of the emissions on average from all projects would exceed that level and be “captured” by the Screening Tables or alternative emission analysis method.

In determining this level of emissions, SCAQMD used the database of projects kept by the Governor’s Office of Planning and Research. That database contained 798 projects, 60 of which were extremely large General Plan Updates, Master Plans, or Specific Plan Projects. The 60 very large projects were removed from the database in order not to skew the emissions value, leaving a net of 738 projects. In addition, 27 projects were found to be outliers that would skew the emission value too high, leaving 711 as the sample population to use in determining the 90th percentile capture rate.³⁵

This analysis determined that the 90th percentile ranged from 2,983 to 3,143 MT CO₂e per year. The 3,000 MT CO₂e per year value is the low-end value within that range rounded to the nearest hundred tons of emissions and is used in defining small projects that are considered less than significant. A project under this level would be less than significant and consistent with the CAP.

Greenhouse Gas Regional Emission Estimates

In 2022, the United States emitted about 6,343 million metric tons of CO₂e or 5,489 million metric tons of CO₂e after accounting for sequestration from the land sector. Emissions increased in 2022 by 1 percent. The increase in total GHG emissions was driven largely by an increase in CO₂ emissions from fossil fuel combustion. In 2022, CO₂ emissions from fossil fuel combustion increased by 1 percent compared to the previous year. This increase in fossil fuel consumption emissions was due in part to the continued rebound in economic activity after the height of the COVID-19 pandemic.³⁶

According to USEPA, net emissions were 17 percent below 2005 levels. The recent decline is mostly due to a shift to less CO₂-intensive natural gas for generating electricity and a rapid increase in the use of renewable energy in the electric power sector. In 2022, transportation activities accounted for 28 percent of total GHG emissions. Emissions from electric power accounted for the second largest portion (25 percent), while emissions from industry accounted for the third largest portion (23 percent).³⁷

In 2022, California emitted approximately 371 million metric tons of CO₂e, 9.3 million metric tons of CO₂e lower than 2021 levels and 60 million metric tons of CO₂e below the 2020 GHG limit of 431 million metric tons of CO₂e). The transportation sector represents 39 percent of the total GHG emissions. The industrial sector represents 23 percent of the total GHG emissions, followed by electricity (11 percent), and residential, agricultural, and commercial (8, 8, and 6 percent, respectively). The 2022 emissions data shows that the State of California is continuing its established long-term trend of GHG emissions declines,

³⁵ County of Riverside, Climate Action Plan Update, November 2019, <https://planning.rctlma.org/general-plan-and-zoning/riverside-county-climate-action-plan>

³⁶ United States Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990 - 2022*, April 2024, <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks>

³⁷ United States Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990 - 2022*, April 2024, <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks>

despite the anomalous emissions trends from 2019 through 2021, due in large part to the impacts of the COVID-19 pandemic.³⁸

Thresholds of Significance

CEQA Guidelines Appendix G includes a list of potentially significant project impacts. The project would have a GHG emissions impact if it would:

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

CEQA Guidelines Section 15064.4 provides guidance to lead agencies for determining the significance of environmental impacts pertaining to GHG emissions. Section 15064.4(a) states that a lead agency should make a good-faith effort that is based, to the extent possible, on scientific and factual data to describe, calculate, or estimate the amount of GHG emissions that would result from implementation of a project. CEQA Guidelines Section 15064.4(b) also states that, when assessing the significance of impacts from GHG emissions, a lead agency should consider (1) the extent to which the project may increase or reduce GHG emissions compared with existing conditions, (2) whether the project's GHG emissions would exceed a threshold of significance that the lead agency has determined to be applicable to the project, and (3) the extent to which the project would comply with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Because the issue of global climate change is inherently a cumulative issue, the contribution of project GHG emissions to climate change is addressed as a cumulative impact. Some counties, cities, and air districts have developed guidance and thresholds for determining the significance of GHG emissions that occur within their jurisdiction.

CEQA allows lead agencies to identify thresholds of significance applicable to a project that are supported by substantial evidence. Substantial evidence is defined in the CEQA statute to mean "facts, reasonable assumptions predicated on facts, and expert opinion supported by facts" (14 CCR 15384(b)).³⁹ Substantial evidence can be in the form of technical studies, agency staff reports or opinions, expert opinions supported by facts, and prior CEQA assessments and planning documents. Therefore, to establish additional context in which to consider the order of magnitude of the project's GHG emissions, this

³⁸ California Air Resources Board, *Emissions Trends Report 2000-2022 (2024 Edition)*, September 2024, <https://ww2.arb.ca.gov/ghg-inventory-data>

³⁹ 14 CCR 15384 provides the following discussion: "Substantial evidence" as used in the Guidelines is the same as the standard of review used by courts in reviewing agency decisions. Some cases suggest that a higher standard, the so called "fair argument standard" applies when a court is reviewing an agency's decision whether or not to prepare an EIR. Public Resources Code section 21082.2 was amended in 1993 (Chapter 1131) to provide that substantial evidence shall include "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." The statute further provides that "argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence."

analysis accounts for the following considerations by other government agencies and associations about what levels of GHG emissions constitute a cumulatively considerable incremental contribution to climate change:

SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. The SCAQMD adopted an interim 10,000 metric tons of CO₂e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD Resolution No. 08-35, December 5, 2008).⁴⁰

Within the Riverside County CAP, a threshold level above 3,000 MT CO₂e per year was used to identify projects that require a project-specific technical analysis to quantify and mitigate project emissions.⁴¹

Construction GHG emissions include emissions from construction equipment, heavy trucks, and worker trips. Per guidance from the SCAQMD, construction emissions are amortized over a 30-year period to account for the contribution of construction emissions over the lifetime of the project and then added to a project's operational emissions to account for the contribution of construction to GHG emissions for the project lifetime.⁴²

This analysis uses the 3,000 metric tons of CO₂e per year significance threshold to assess potential GHG emissions impacts from the project and compatibility with the Riverside County's Climate Action Plan. Project emissions of less than 3,000 metric tons of CO₂e per year would indicate that the project's contribution to global climate change would be less than cumulatively considerable.

Project Greenhouse Gas Emissions

Construction, operations, and eventual decommissioning activities would cause GHG emissions resulting from fossil-fuel combustion in the engines of construction equipment and the vehicles carrying construction materials and workers to and from the site. Diesel fuel or gasoline is used in mobilizing the heavy-duty construction equipment, site development and preparation, facility construction, and roadway construction, and eventual decommissioning. Decommissioning activities would create a temporary phase of emissions similar to those of construction after the end of the project's useful life of 40 years.

Equipment and vehicle use over the duration of construction would amount to 3,241 metric tons of CO₂e emissions during the construction periods. The effects of short-term construction GHG emissions may be averaged over the 40-year life of the project when compared to the annual significance threshold, as

⁴⁰ SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, December 5, 2008, [https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf](https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf)

⁴¹ County of Riverside, Climate Action Plan Update, November 2019, <https://planning.rctlma.org/general-plan-and-zoning/riverside-county-climate-action-plan>

⁴² SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, December 5, 2008, [https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf](https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf)

recommended by SCAQMD. The overall construction GHG emissions amortized over 40 years would be equivalent to an annualized rate of 81 metric tons of CO₂e.

Table 24: Estimated Annual Construction Greenhouse Gas Emissions shows the estimated annual GHG emissions. The estimated 40-year amortized construction GHG emissions are 81 metric tons of CO₂e, which is below the significance threshold of 3,000 metric tons of CO₂e per year. The estimated operational GHG emissions are 185 metric tons of CO₂e per year. The estimated 40-year amortized construction plus operational GHG emissions are 266 metric tons of CO₂e per year, which is below the significance threshold of 3,000 metric tons of CO₂e per year.

Table 24 Estimated Annual Construction Greenhouse Gas Emissions (metric tons)

Year	CO ₂ e
2026	1,856
2027	1,385
Grand Total	3,241
Annual Average	2,160
40-Year Amortized	81
Significance Threshold	3,000
Significant (Yes or No)?	No

SOURCE: CARB EMFAC and OFFROAD

Effects of Land Use Conversion. Installation of the project would result in ground disturbance that would disturb soils and remove some vegetation that naturally provide carbon uptake. Converting a portion of the existing land would eliminate the natural sequestration of carbon because the existing soil and vegetation acts as a sink by removing CO₂ from the atmosphere. Ground disturbance and vegetation removal during construction accordingly adds to the GHG impact because a portion of the soils and vegetation onsite would no longer be present to sequester CO₂. The loss of carbon uptake depends on what fraction of natural vegetation on the site would be cleared for permanent installation of foundations, roads, or other onsite facilities, and on efforts to minimize soil erosion or protect existing ground cover to minimize the loss of carbon uptake. The actual amount of this loss is uncertain because it would depend on the characteristics of the site, and the available data on rates of sequestration by vegetation and soils are approximations and depend on the characteristics of the natural vegetation and soils of each site.

Annual carbon sequestration rates vary depending on the study from 0.16 metric tons carbon/acre/year to 2.52 metric tons carbon/acre/year. One ton of carbon is equivalent to 3.67 tons of CO₂. As vegetation would be allowed to regrow on the project site, it is assumed that the carbon sequestration loss would be on the lower end.⁴³

At this rate, the permanent conversion of up to 535 acres, due to vegetation removal within the solar and BESS facility site, compacted soils for access roads, and impervious areas for equipment at the site, would

⁴³ Center for Conservation Biology, University of California Riverside, November 2013, Carbon Balance in California Deserts: Impacts of Widespread Solar Power Generation, https://escholarship.org/content/qt5cn2d5q5/qt5cn2d5q5_noSplash_93533949dd682ac561e74f96e7641822.pdf?t=rooa_hd

result in between 314 and 4,948 metric tons of CO₂e per year of sequestration capability being lost during the 40-year lifetime. This estimate is conservatively high because the result assumes all aboveground vegetation and soil carbon accumulation potential for the site would be entirely removed. Construction strategies such as restoring portions of the site to pre-project conditions, controlling fugitive dust, and minimizing impacts to vegetation, habitat and soil erosion contribute to preserving some of the natural carbon storage process for effective carbon sequestration.

Emissions Avoided by Producing Electricity. The production of renewable power would displace power produced by carbon-based fuels that would otherwise be used to meet electricity demand. The power displaced is incremental power provided by generators elsewhere on the grid, typically from natural gas power plants. Potential air emissions that could be offset by the project are compared with average emissions from combustion electric power systems for California to examine to what degree solar projects reduce emissions that could be emitted by fossil-fueled power plants generating the same quantity of energy to meet demands.

The project would produce up to about 373,176 MWh of electricity each year for delivery to California's end-users.⁴⁴ Some of the electricity produced would displace fuel-burning by California's flexible natural gas-fired resources or electricity otherwise imported to California. This would avoid GHG that could otherwise be emitted by fuel-burning power plants. The rate of GHG emissions displacement would vary with the mix of generators and imported electricity displaced, with the least efficient and highest-emitting generators normally being turned down to accommodate the additional renewable generation; in California, there is a single dominant dispatchable fuel (natural gas).⁴⁵ To estimate the emissions avoided by solar production, this analysis assumes that the BESS component would dispatch its stored energy after the solar output decreases for the day. Because natural gas provides most of the flexible capacity, this analysis uses an avoided emissions displacement factor of approximately 0.373 MT of CO₂ per MWh which is a conservatively low emission factor for efficient, conventional generation using natural gas, combined cycle generators.⁴⁶

The proposed energy storage component would allow solar facilities to shift the solar output to the grid-wide system during peak (evening) hours when solar production has the most benefits (or is most valuable

⁴⁴ A 1-MW solar facility generates electricity only during the sunshine hours, which varies dependent upon the location. Sun is available only between 7 AM and 7 PM, and even during this period, peak sunshine is available only for several hours. As a result, what 1-MW of solar panels can produce during a day is much less than 24 MWh. The capacity factor of a utility scale solar facility accounts for how much energy is produced compared with the theoretical maximum output, which accounts for the number of sunshine hours. On average in California, solar facilities have a capacity factor of 28.4 percent and generate approximately 7 MWh of electricity per day or 2,435 MWh of electricity per year. A 150-MW solar facility would produce approximately 150-MW * 8,760 hours per year * 28.4 percent capacity factor = 373,176 MWh of electricity per year.

⁴⁵ California Energy Commission, Estimated Cost of New Utility-Scale Generating in California: 2018 Update. CEC-200-2019-500. May 2019. <https://www.energy.ca.gov/publications/2019/estimated-cost-new-utility-scale-generation-california-2018-update>

⁴⁶ California Energy Commission, Estimated Cost of New Utility-Scale Generating in California: 2018 Update. CEC-200-2019-500. May 2019. <https://www.energy.ca.gov/publications/2019/estimated-cost-new-utility-scale-generation-california-2018-update>

in deferring use of natural gas elsewhere). This would result in the avoidance of 134,845 metric tons of CO₂ per year.

The combined direct and indirect effects of the emissions quantified indicates that a net GHG reduction would occur because of implementing the project, by avoiding 134,845 metric tons of CO₂e annually. While accounting -for the effects of land use conversion, the range of net GHG reductions would be 129,816 and 134,450 metric tons of CO₂e annually. This impact would be less than significant (an overall benefit), and no mitigation is required.

Consistency with State and Local GHG Reduction Plans

CARB's 2022 Scoping Plan extends and expands upon earlier scoping plans with a target of reducing anthropogenic GHG emissions to 85 percent below 1990 levels by 2045. The 2022 Scoping Plan's strategies that are applicable to the project include reducing fossil fuel use, energy demand, and VMT. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Executive Order B-30-15 established a statewide emissions reduction target of 40 percent below 1990 levels by 2030, which has been implemented by SB 32. This measure was identified to keep the state on a trajectory needed to meet the 2050 goal of reducing GHG emissions to 80 percent below 1990 levels by 2050 pursuant to Executive Order S-3-05. These emissions reductions are outlined and implemented through CARB's 2017 and 2022 Scoping Plans.

The project would produce electricity in a manner that improves California's ability to supply renewable energy to end-use customers and to achieve statewide renewable energy goals. Electricity from the solar generating station would be used to serve the needs of California's customers and would facilitate compliance with California's Renewables Portfolio Standard (RPS).

The renewable energy targets in the RPS support California's overall approach to achieving GHG reduction goals. The California Global Warming Solutions Act of 2006 (AB 32) and Senate Bill 32 (SB 32) of 2016 codified the GHG emissions target to 40 percent below the 1990 level by 2030. Subsequently, California's Clean Energy and Pollution Reduction Act of 2015 [Senate Bill 350 (SB 350)], SB 350 set ambitious 2030 targets for energy efficiency and renewable electricity, among other actions aimed at reducing GHG emissions across the energy and transportation sectors. SB 350 also enhances the state's ability to meet its long-term climate goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. The current RPS was signed into law in September 2018 with Senate Bill 100 (SB 100), which established the goals of 50 percent renewable energy resources by 2026 and 60 percent renewable energy resources by 2030. SB 100 also sets a target for California to achieve a GHG-free energy supply by December 31, 2045.

The strategy for achieving the GHG reductions is set forth by the CARB Climate Change Scoping Plan. Overall, the electricity produced by the project would contribute to continuing GHG reductions in California's power supply. Because the project would use renewable energy resources to produce electricity, the avoided GHG emissions would be consistent with and would not conflict with the California's GHG emissions reduction targets and the Climate Change Scoping Plan that relies on achieving

the RPS targets. Additionally, the project would be consistent with County of Riverside policy direction on promoting renewable energy, as in the 2019 Climate Action Plan Update, and to facilitate development and siting of renewable energy facilities and transmission lines in appropriate locations (Policy AQ 20.19).

Other activities related to construction, operation, and decommissioning of the project would either be exempt from or would be required to comply with CARB rules and regulations to reduce GHG emissions and would cause no other potential conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

As the total GHG emissions generated during construction, operation, and decommissioning of the project would be considerably less than the GHG emissions avoided, the solar power plant would lead to a net reduction in GHG emissions across the State's electricity system, which would contribute to meeting the State's GHG reduction goals under AB 32 and subsequent targets for 2030 and beyond. The project would not conflict with any applicable GHG management plan, policy, or regulation. This impact would be less than significant, and no mitigation is required.

14.0 SUMMARY

In summary, daily mitigated construction emissions would not exceed the significance thresholds, as described in **Section 6**. These impacts are largely due to off-road construction equipment and to a much lesser degree due to off-site construction haul trucks as well as construction worker trips on unpaved access roads. Project's construction emissions would be less than significant with mitigation. Mitigation measures are documented within **Section 7**.

Once operational, the project would result in less than significant impacts of criteria air pollutants (**Section 8**). Ambient Air concentrations are estimated to be less than significant (**Section 9**). Health impacts (**Section 10**) and odor impacts (**Section 11**) would be less than significant. Cumulative impacts during construction (**Section 12**) would be less than significant. GHG emissions would be less than significant (**Section 13**). Additionally, the long-term benefits resulting from the avoidance of operational emissions (both criteria pollutants and GHG) offset the temporary emissions due to construction activities.

Attachment A1

Project Emissions Inventory Supporting Information

- **Construction Summary**
Unmitigated and Mitigated
- **Construction Employee Vehicles and Haul Trucks**
Unmitigated and Mitigated
- **Construction Offroad Equipment**
Unmitigated and Mitigated
- **Construction Fugitive Dust**
- **Operation Summary**

Grand Total Emissions - Savira Solar Project - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	906	12,134	6,766	4,096,524	27,326	3,033	39.5 pounds/year
2027	671	8,711	5,026	3,052,951	19,610	2,179	29.4 pounds/year
2028	-	-	-	-	-	-	- pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	0.45	6.07	3.38	1,858	13.7	1.52	0.02 tons/year
2027	0.34	4.36	2.51	1,385	9.81	1.09	0.01 tons/year
2028	-	-	-	-	-	-	- tons/year
Threshold	25	100	25		70	70	100
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	3.48	46.7	26.0		105	11.7	0.15 pounds/day, average
2027	2.58	33.5	19.3		75.4	8.38	0.11 pounds/day, average
2028	-	-	-		-	-	- pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	8.48	121	63.7		325	35.1	0.41 pounds/day, maximum
2027	7.46	110	53.4		298	32.3	0.38 pounds/day, maximum
2028	-	-	-		-	-	- pounds/day, maximum
Threshold	75	550	100		150	55	150

Grand Total Emissions - Savira Solar Project - Mitigated Tier 4

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	653	19,143	3,942	4,091,757	2,948	391	39.5	pounds/year
2027	477	12,989	2,976	3,052,951	2,167	286	29.4	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.33	9.57	1.97	1,856	1.47	0.20	0.02	tons/year
2027	0.24	6.49	1.49	1,385	1.08	0.14	0.01	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	2.51	73.6	15.2		11.3	1.50	0.15	pounds/day, average
2027	1.83	50.0	11.4		8.34	1.10	0.11	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	5.95	185	33.4		34.1	4.29	0.41	pounds/day, maximum
2027	5.38	165	30.7		31.6	4.01	0.38	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Onroad Vehicle Emissions - Savira Solar Project - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	53.6	4,354	404	2,109,167	26,637	2,687	20.7 pounds/year
2027	34.2	2,815	303	1,571,496	19,313	1,946	15.3 pounds/year
2028	-	-	-	-	-	-	- pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	0.03	2.18	0.20	957	13.3	1.34	0.01 tons/year
2027	0.02	1.41	0.15	713	9.66	0.97	0.01 tons/year
2028	-	-	-	-	-	-	- tons/year
Threshold	25	100	25		70	70	100
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	0.21	16.7	1.56		102	10.3	0.08 pounds/day, average
2027	0.13	10.8	1.16		74.3	7.49	0.06 pounds/day, average
2028	-	-	-		-	-	- pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	0.65	53.6	4.57		319	32.2	0.24 pounds/day, maximum
2027	0.54	46.2	3.92		293	29.6	0.22 pounds/day, maximum
2028	-	-	-		-	-	- pounds/day, maximum
Threshold	75	550	100		150	55	150

Stage 1 - Mobilization, site prep, fencing, equipment, trenching

Stage 2 - Cable install, trench backfill, pile and locking install, fiberline install, outside install, lens install

Stage 3 - Inserter, pile racking, module, box install, commissioning/testing

PIV WORK

Sevier - Boulder County, CO - PIV ESTIMATE: 8000/200/400 - CRAFT ESTIMATE

Construction Month

Construction Week

ERC (24 months)

RFI (12 months)

RES (17 months)

CSO (24 months)

Total Craft

ERC (24 months)

RFI (12 months)

RES (17 months)

CSO (24 months)

Total Craft

Material and Equipment Deliveries - PIV

Construction Month

Total

CONSTRUCTION		MONTH 1		MONTH 2		MONTH 3		MONTH 4		MONTH 5		MONTH 6		MONTH 7		MONTH 8		MONTH 9		MONTH 10		MONTH 11		MONTH 12		M1		MONTH 12		MONTH 13		MONTH 14		MONTH 15		MONTH 16		MONTH 17		MONTH 18		MONTH 19		MONTH 20		MONTH 21		MONTH 22		MONTH 23		MONTH 24		MONTH 25		MONTH 26		MONTH 27		MONTH 28		MONTH 29		MONTH 30		MONTH 31		MONTH 32		MONTH 33		MONTH 34		MONTH 35		MONTH 36		MONTH 37		MONTH 38		MONTH 39		MONTH 40		MONTH 41		MONTH 42		MONTH 43		MONTH 44		MONTH 45		MONTH 46		MONTH 47		MONTH 48		MONTH 49		MONTH 50		MONTH 51		MONTH 52		MONTH 53		MONTH 54		MONTH 55		MONTH 56		MONTH 57		MONTH 58		MONTH 59		MONTH 60		MONTH 61		MONTH 62		MONTH 63		MONTH 64		MONTH 65		MONTH 66		MONTH 67		MONTH 68		MONTH 69		MONTH 70		MONTH 71		MONTH 72		MONTH 73		MONTH 74		MONTH 75		MONTH 76		MONTH 77		MONTH 78		MONTH 79		MONTH 80		MONTH 81		MONTH 82		MONTH 83		MONTH 84		MONTH 85		MONTH 86		MONTH 87		MONTH 88		MONTH 89		MONTH 90		MONTH 91		MONTH 92		MONTH 93		MONTH 94		MONTH 95		MONTH 96		MONTH 97		MONTH 98		MONTH 99		MONTH 100		MONTH 101		MONTH 102		MONTH 103		MONTH 104		MONTH 105		MONTH 106		MONTH 107		MONTH 108		MONTH 109		MONTH 110		MONTH 111		MONTH 112		MONTH 113		MONTH 114		MONTH 115		MONTH 116		MONTH 117		MONTH 118		MONTH 119		MONTH 120		MONTH 121		MONTH 122		MONTH 123		MONTH 124		MONTH 125		MONTH 126		MONTH 127		MONTH 128		MONTH 129		MONTH 130		MONTH 131		MONTH 132		MONTH 133		MONTH 134		MONTH 135		MONTH 136		MONTH 137		MONTH 138		MONTH 139		MONTH 140		MONTH 141		MONTH 142		MONTH 143		MONTH 144		MONTH 145		MONTH 146		MONTH 147		MONTH 148		MONTH 149		MONTH 150		MONTH 151		MONTH 152		MONTH 153		MONTH 154		MONTH 155		MONTH 156		MONTH 157		MONTH 158		MONTH 159		MONTH 160		MONTH 161		MONTH 162		MONTH 163		MONTH 164		MONTH 165		MONTH 166		MONTH 167		MONTH 168		MONTH 169		MONTH 170		MONTH 171		MONTH 172		MONTH 173		MONTH 174		MONTH 175		MONTH 176		MONTH 177		MONTH 178		MONTH 179		MONTH 180		MONTH 181		MONTH 182		MONTH 183		MONTH 184		MONTH 185		MONTH 186		MONTH 187		MONTH 188		MONTH 189		MONTH 190		MONTH 191		MONTH 192		MONTH 193		MONTH 194		MONTH 195		MONTH 196		MONTH 197		MONTH 198		MONTH 199		MONTH 200		MONTH 201		MONTH 202		MONTH 203		MONTH 204		MONTH 205		MONTH 206		MONTH 207		MONTH 208		MONTH 209		MONTH 210		MONTH 211		MONTH 212		MONTH 213		MONTH 214		MONTH 215		MONTH 216		MONTH 217		MONTH 218		MONTH 219		MONTH 220		MONTH 221		MONTH 222		MONTH 223		MONTH 224		MONTH 225		MONTH 226		MONTH 227		MONTH 228		MONTH 229		MONTH 230		MONTH 231		MONTH 232		MONTH 233		MONTH 234		MONTH 235		MONTH 236		MONTH 237		MONTH 238		MONTH 239		MONTH 240		MONTH 241		MONTH 242		MONTH 243		MONTH 244		MONTH 245		MONTH 246		MONTH 247		MONTH 248		MONTH 249		MONTH 250		MONTH 251		MONTH 252		MONTH 253		MONTH 254		MONTH 255		MONTH 256		MONTH 257		MONTH 258		MONTH 259		MONTH 260		MONTH 261		MONTH 262		MONTH 263		MONTH 264		MONTH 265		MONTH 266		MONTH 267		MONTH 268		MONTH 269		MONTH 270		MONTH 271		MONTH 272		MONTH 273		MONTH 274		MONTH 275		MONTH 276		MONTH 277		MONTH 278		MONTH 279		MONTH 280		MONTH 281		MONTH 282		MONTH 283		MONTH 284		MONTH 285		MONTH 286		MONTH 287		MONTH 288		MONTH 289		MONTH 290		MONTH 291		MONTH 292		MONTH 293		MONTH 294		MONTH 295		MONTH 296		MONTH 297		MONTH 298		MONTH 299		MONTH 300		MONTH 301		MONTH 302		MONTH 303		MONTH 304		MONTH 305		MONTH 306		MONTH 307		MONTH 308		MONTH 309		MONTH 310		MONTH 311		MONTH 312		MONTH 313		MONTH 314		MONTH 315		MONTH 316		MONTH 317		MONTH 318		MONTH 319		MONTH 320		MONTH 321		MONTH 322		MONTH 323		MONTH 324		MONTH 325		MONTH 326		MONTH 327		MONTH 328		MONTH 329		MONTH 330		MONTH 331		MONTH 332		MONTH 333		MONTH 334		MONTH 335		MONTH 336		MONTH 337		MONTH 338		MONTH 339		MONTH 340		MONTH 341		MONTH 342		MONTH 343		MONTH 344		MONTH 345		MONTH 346		MONTH 347		MONTH 348		MONTH 349		MONTH 350		MONTH 351		MONTH 352		MONTH 353		MONTH 354		MONTH 355		MONTH 356		MONTH 357		MONTH 358		MONTH 359		MONTH 360		MONTH 361		MONTH 362		MONTH 363		MONTH 364		MONTH 365		MONTH 366		MONTH 367		MONTH 368		MONTH 369		MONTH 370		MONTH 371		MONTH 372		MONTH 373		MONTH 374		MONTH 375		MONTH 376		MONTH 377		MONTH 378		MONTH 379		MONTH 380		MONTH 381		MONTH 382		MONTH 383		MONTH 384		MONTH 385		MONTH 386		MONTH 387		MONTH 388		MONTH 389		MONTH 390		MONTH 391		MONTH 392		MONTH 393		MONTH 394		MONTH 395		MONTH 396		MONTH 397		MONTH 398		MONTH 399		MONTH 400		MONTH 401		MONTH 402		MONTH 403		MONTH 404		MONTH 405		MONTH 406		MONTH 407		MONTH 408		MONTH 409		MONTH 410		MONTH 411		MONTH 412		MONTH 413		MONTH 414		MONTH 415		MONTH 416		MONTH 417		MONTH 418		MONTH 419		MONTH 420		MONTH 421		MONTH 422		MONTH 423		MONTH 424		MONTH 425		MONTH 426		MONTH 427		MONTH 428		MONTH 429		MONTH 430		MONTH 431		MONTH 432		MONTH 433		MONTH 434		MONTH 435		MONTH 436		MONTH 437		MONTH 438		MONTH 439		MONTH 440		MONTH 441		MONTH 442		MONTH 443		MONTH 444		MONTH 445		MONTH 446		MONTH 447		MONTH 448		MONTH 449		MONTH 450		MONTH 451		MONTH 452		MONTH 453		MONTH 454		MONTH 455		MONTH 456		MONTH 457		MONTH 458		MONTH 459		MONTH 460		MONTH 461		MONTH 462		MONTH 463		MONTH 464		MONTH 465		MONTH 466		MONTH 467		MONTH 468		MONTH 469		MONTH 470		MONTH 471		MONTH 472		MONTH 473		MONTH 474		MONTH 475		MONTH 476		MONTH 477		MONTH 478		MONTH 479		MONTH 480		MONTH 481		MONTH 482		MONTH 483		MONTH 484		MONTH 485		MONTH 486		MONTH 487		MONTH 488		MONTH 489		MONTH 490		MONTH 491		MONTH 492		MONTH 493		MONTH 494		MONTH 495		MONTH 496		MONTH 497		MONTH 498		MONTH 499		MONTH 500		MONTH 501		MONTH 502		MONTH 503		MONTH 504		MONTH 505		MONTH 506		MONTH 507		MONTH 508		MONTH 509		MONTH 510		MONTH 511		MONTH 512		MONTH 513		MONTH 514		MONTH 515		MONTH 516		MONTH 517		MONTH 518		MONTH 519		MONTH 520		MONTH 521		MONTH 522		MONTH 523		MONTH 524		MONTH 525		MONTH 526		MONTH 527		MONTH 528		MONTH 529		MONTH 530		MONTH 531		MONTH 532		MONTH 533		MONTH 534		MONTH 535		MONTH 536		MONTH 537		MONTH 538		MONTH 539		MONTH 540		MONTH 541		MONTH 542		MONTH 543		MONTH 544		MONTH 545		MONTH 546		MONTH 547		MONTH 548		MONTH 549		MONTH 550		MONTH 551		MONTH 552		MONTH 553		MONTH 554		MONTH 555		MONTH 556		MONTH 557		MONTH 558		MONTH 559		MONTH 560		MONTH 561		MONTH 562		MONTH 563		MONTH 564		MONTH 565		MONTH 566		MONTH 567		MONTH 568		MONTH 569		MONTH 570		MONTH 571		MONTH 572		MONTH 573		MONTH 574		MONTH 575		MONTH 576		MONTH 577		MONTH 578		MONTH 579		MONTH 580		MONTH 581		MONTH 582		MONTH 583		MONTH 584		MONTH 585		MONTH 586		MONTH 587		MONTH 588		MONTH 589		MONTH 590		MONTH 591		MONTH 592		MONTH 593		MONTH 594		MONTH 595		MONTH 596		MONTH 597		MONTH 598		MONTH 599		MONTH 600		MONTH 601		MONTH 602		MONTH 603		MONTH 604		MONTH 605		MONTH 606		MONTH 607		MONTH 608		MONTH 609		MONTH 610		MONTH 611		MONTH 612		MONTH 613		MONTH 614		MONTH 615		MONTH 616		MONTH 617		MONTH 618		MONTH 619		MONTH 620		MONTH 621		MONTH 622		MONTH 623		MONTH 624		MONTH 625		MONTH 626		MONTH 627		MONTH 628		MONTH 629		MONTH 630		MONTH 631		MONTH 632		MONTH 633		MONTH 634		MONTH 635		MONTH 636		MONTH 637		MONTH 638		MONTH 639		MONTH 640		MONTH 641		MONTH 642		MONTH 643		MONTH 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Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bss install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

Saver - Riverside County, CA - PV 120kWac, BESS 250kWh/c, CRAFT 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Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

[illegible]

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

HV WORK

Sevier - Riverside County, CA - PV 120MW; RES: 250MW/4H - CRAFT ESTIMATE	CONSTRUCTION	Month 1												Month 2												Month 3												Month 4												Month 5												Month 6												Month 7												Month 8												Month 9												Month 10												Month 11												Month 12												Month 13												Month 14												Month 15												Month 16												Month 17												Month 18												Month 19												Month 20												Month 21												Month 22												Month 23												Month 24												Month 25												Month 26												Month 27												Month 28												Month 29												Month 30												Month 31												Month 32												Month 33												Month 34												Month 35												Month 36												Month 37												Month 38												Month 39												Month 40												Month 41												Month 42												Month 43												Month 44												Month 45												Month 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Onroad Vehicle Emissions - Savira Solar Project - Mitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	53.4	4,342	404	2,104,400	2,778	301	20.6 pounds/year
2027	34.2	2,815	303	1,571,496	2,094	225	15.3 pounds/year
2028	-	-	-	-	-	-	- pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	0.03	2.17	0.20	955	1.39	0.15	0.01 tons/year
2027	0.02	1.41	0.15	713	1.05	0.11	0.01 tons/year
2028	-	-	-	-	-	-	- tons/year
Threshold	25	100	25		70	70	100
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	0.21	16.7	1.55		10.7	1.16	0.08 pounds/day, average
2027	0.13	10.8	1.16		8.05	0.86	0.06 pounds/day, average
2028	-	-	-		-	-	- pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	0.65	53.6	4.57		32.8	3.56	0.24 pounds/day, maximum
2027	0.54	46.2	3.92		30.3	3.28	0.22 pounds/day, maximum
2028	-	-	-		-	-	- pounds/day, maximum
Threshold	75	550	100		150	55	150

Stage 1 - Mobilization, site prep, fencing, topographic survey

Stage 2 - Layout control, trench layout, pile and locking control, foundation control, structure control, site work

Stage 3 - Inverter, pile racking, module, box install, commissioning/testing

PIV WORK

Sevier - Bonneville County, CA - PV - 1200kW/100 - 200W/100 - CRAFT ESTIMATE

Construction Month

Construction Week

ERC (24 months)

INV (12 months)

RES (17 months)

CSG (24 months)

Total Craft

ERC (24 months)

INV (12 months)

RES (17 months)

CSG (24 months)

Total Craft

Material and Equipment Deliveries - PV

Construction Month

Total

MONTH 1										MONTH 2										MONTH 3										MONTH 4										MONTH 5										MONTH 6										MONTH 7										MONTH 8										MONTH 9										MONTH 10										MONTH 11										MONTH 12										MONTH 13										MONTH 14										MONTH 15										MONTH 16										MONTH 17										MONTH 18										MONTH 19										MONTH 20										MONTH 21										MONTH 22										MONTH 23										MONTH 24										MONTH 25										MONTH 26										MONTH 27										MONTH 28										MONTH 29										MONTH 30										MONTH 31										MONTH 32										MONTH 33										MONTH 34										MONTH 35										MONTH 36										MONTH 37										MONTH 38										MONTH 39										MONTH 40										MONTH 41										MONTH 42										MONTH 43										MONTH 44										MONTH 45										MONTH 46										MONTH 47										MONTH 48										MONTH 49										MONTH 50										MONTH 51										MONTH 52										MONTH 53										MONTH 54										MONTH 55										MONTH 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Stage 1 - Mobilization, site prep, fencing, layGasolin Diesel

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

HV WORK

[illegible]

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

HV WORK

[illegible]

Offroad Equipment Emissions - Savira Solar Project - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	852	7,780	6,362	1,987,357	336	309	18.9	pounds/year
2027	636	5,896	4,724	1,481,455	247	227	14.1	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.43	3.89	3.18	901	0.17	0.15	0.01	tons/year
2027	0.32	2.95	2.36	672	0.12	0.11	0.01	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	3.28	29.9	24.5		1.29	1.19	0.07	pounds/day, average
2027	2.45	22.7	18.2		0.95	0.87	0.05	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	7.85	68.9	59.2		3.06	2.81	0.17	pounds/day, maximum
2027	6.92	63.5	49.5		2.62	2.41	0.16	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bss install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

Sanja - Riverside Gating, CA - PO: Construction MRS. SORAWANUN - DRAFT ESTIMATE										CONTINUATION																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
Construction Week										Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	JAN	FEB	MARCH 12	MARCH 13	MARCH 14	MARCH 15	MARCH 16	MARCH 17	MARCH 18	MARCH 19	MARCH 20	MARCH 21	MARCH 22	MARCH 23	MARCH 24	MARCH 25	MARCH 26	MARCH 27	MARCH 28	MARCH 29	MARCH 30	MARCH 31	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY

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Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

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31	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY</

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HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

Series: Riverside County, CA, PG 1204WV, B01, 2104WVWV: CRAFT ESTIMATE			CONSTRUCTION																																																												NOC												IC											
			Month 1					Month 2					Month 3					Month 4					Month 5					Month 6					Month 7					Month 8					Month 9					Month 10					Month 11					Month 12					Month 13					Month 14					Month 15													
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60																								
Rate of work	Construction Month	Construction Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46																																						

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

Series: Riverside County, CA, PG 132WML, BSL 132WML/EN - DRAFT ESTIMATE			CONSTRUCTION	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	Month 13	Month 14	Month 15	Month 16	Month 17	Month 18	Month 19	Month 20	Month 21	Month 22	Month 23	Month 24	Month 25	Month 26	Month 27	Month 28	Month 29	Month 30	Month 31	Month 32	Month 33	Month 34	Month 35	Month 36	Month 37	Month 38	Month 39	Month 40	Month 41	Month 42	Month 43	Month 44	Month 45	Month 46	Month 47	Month 48	Month 49	Month 50	Month 51	Month 52	Month 53	Month 54	Month 55	Month 56	Month 57	Month 58	Month 59	Month 60	Month 61	Month 62	Month 63	Month 64	Month 65	Month 66	Month 67	Month 68	Month 69	Month 70	Month 71	Month 72	Month 73	Month 74	Month 75	Month 76	Month 77	Month 78	Month 79	Month 80	Month 81	Month 82	Month 83	Month 84	Month 85	Month 86	Month 87	Month 88	Month 89	Month 90	Month 91	Month 92	Month 93	Month 94	Month 95	Month 96	Month 97	Month 98	Month 99	Month 100	Month 101	Month 102	Month 103	Month 104	Month 105	Month 106	Month 107	Month 108	Month 109	Month 110	Month 111	Month 112	Month 113	Month 114	Month 115	Month 116	Month 117	Month 118	Month 119	Month 120	Month 121	Month 122	Month 123	Month 124	Month 125	Month 126	Month 127	Month 128	Month 129	Month 130	Month 131	Month 132	Month 133	Month 134	Month 135	Month 136	Month 137	Month 138	Month 139	Month 140	Month 141	Month 142	Month 143	Month 144	Month 145	Month 146	Month 147	Month 148	Month 149	Month 150	Month 151	Month 152	Month 153	Month 154	Month 155	Month 156	Month 157	Month 158	Month 159	Month 160	Month 161	Month 162	Month 163	Month 164	Month 165	Month 166	Month 167	Month 168	Month 169	Month 170	Month 171	Month 172	Month 173	Month 174	Month 175	Month 176	Month 177	Month 178	Month 179	Month 180	Month 181	Month 182	Month 183	Month 184	Month 185	Month 186	Month 187	Month 188	Month 189	Month 190	Month 191	Month 192	Month 193	Month 194	Month 195	Month 196	Month 197	Month 198	Month 199	Month 200	Month 201	Month 202	Month 203	Month 204	Month 205	Month 206	Month 207	Month 208	Month 209	Month 210	Month 211	Month 212	Month 213	Month 214	Month 215	Month 216	Month 217	Month 218	Month 219	Month 220	Month 221	Month 222	Month 223	Month 224	Month 225	Month 226	Month 227	Month 228	Month 229	Month 230	Month 231	Month 232	Month 233	Month 234	Month 235	Month 236	Month 237	Month 238	Month 239	Month 240	Month 241	Month 242	Month 243	Month 244	Month 245	Month 246	Month 247	Month 248	Month 249	Month 250	Month 251	Month 252	Month 253	Month 254	Month 255	Month 256	Month 257	Month 258	Month 259	Month 260	Month 261	Month 262	Month 263	Month 264	Month 265	Month 266	Month 267	Month 268	Month 269	Month 270	Month 271	Month 272	Month 273	Month 274	Month 275	Month 276	Month 277	Month 278	Month 279	Month 280	Month 281	Month 282	Month 283	Month 284	Month 285	Month 286	Month 287	Month 288	Month 289	Month 290	Month 291	Month 292	Month 293	Month 294	Month 295	Month 296	Month 297	Month 298	Month 299	Month 300	Month 301	Month 302	Month 303	Month 304	Month 305	Month 306	Month 307	Month 308	Month 309	Month 310	Month 311	Month 312	Month 313	Month 314	Month 315	Month 316	Month 317	Month 318	Month 319	Month 320	Month 321	Month 322	Month 323	Month 324	Month 325	Month 326	Month 327	Month 328	Month 329	Month 330	Month 331	Month 332	Month 333	Month 334	Month 335	Month 336	Month 337	Month 338	Month 339	Month 340	Month 341	Month 342	Month 343	Month 344	Month 345	Month 346	Month 347	Month 348	Month 349	Month 350	Month 351	Month 352	Month 353	Month 354	Month 355	Month 356	Month 357	Month 358	Month 359	Month 360	Month 361	Month 362	Month 363	Month 364	Month 365	Month 366	Month 367	Month 368	Month 369	Month 370	Month 371	Month 372	Month 373	Month 374	Month 375	Month 376	Month 377	Month 378	Month 379	Month 380	Month 381	Month 382	Month 383	Month 384	Month 385	Month 386	Month 387	Month 388	Month 389	Month 390	Month 391	Month 392	Month 393	Month 394	Month 395	Month 396	Month 397	Month 398	Month 399	Month 400	Month 401	Month 402	Month 403	Month 404	Month 405	Month 406	Month 407	Month 408	Month 409	Month 410	Month 411	Month 412	Month 413	Month 414	Month 415	Month 416	Month 417	Month 418	Month 419	Month 420	Month 421	Month 422	Month 423	Month 424	Month 425	Month 426	Month 427	Month 428	Month 429	Month 430	Month 431	Month 432	Month 433	Month 434	Month 435	Month 436	Month 437	Month 438	Month 439	Month 440	Month 441	Month 442	Month 443	Month 444	Month 445	Month 446	Month 447	Month 448	Month 449	Month 450	Month 451	Month 452	Month 453	Month 454	Month 455	Month 456	Month 457	Month 458	Month 459	Month 460	Month 461	Month 462	Month 463	Month 464	Month 465	Month 466	Month 467	Month 468	Month 469	Month 470	Month 471	Month 472	Month 473	Month 474	Month 475	Month 476	Month 477	Month 478	Month 479	Month 480	Month 481	Month 482	Month 483	Month 484	Month 485	Month 486	Month 487	Month 488	Month 489	Month 490	Month 491	Month 492	Month 493	Month 494	Month 495	Month 496	Month 497	Month 498	Month 499	Month 500	Month 501	Month 502	Month 503	Month 504	Month 505	Month 506	Month 507	Month 508	Month 509	Month 510	Month 511	Month 512	Month 513	Month 514	Month 515	Month 516	Month 517	Month 518	Month 519	Month 520	Month 521	Month 522	Month 523	Month 524	Month 525	Month 526	Month 527	Month 528	Month 529	Month 530	Month 531	Month 532	Month 533	Month 534	Month 535	Month 536	Month 537	Month 538	Month 539	Month 540	Month 541	Month 542	Month 543	Month 544	Month 545	Month 546	Month 547	Month 548	Month 549	Month 550	Month 551	Month 552	Month 553	Month 554	Month 555	Month 556	Month 557	Month 558	Month 559	Month 560	Month 561	Month 562	Month 563	Month 564	Month 565	Month 566	Month 567	Month 568	Month 569	Month 570	Month 571	Month 572	Month 573	Month 574	Month 575	Month 576	Month 577	Month 578	Month 579	Month 580	Month 581	Month 582	Month 583	Month 584	Month 585	Month 586	Month 587	Month 588	Month 589	Month 590	Month 591	Month 592	Month 593	Month 594	Month 595	Month 596	Month 597	Month 598	Month 599	Month 600	Month 601	Month 602	Month 603	Month 604	Month 605	Month 606	Month 607	Month 608	Month 609	Month 610	Month 611	Month 612	Month 613	Month 614	Month 615	Month 616	Month 617	Month 618	Month 619	Month 620	Month 621	Month 622	Month 623	Month 624	Month 625	Month 626	Month 627	Month 628	Month 629	Month 630	Month 631	Month 632	Month 633	Month 634	Month 635	Month 636	Month 637	Month 638	Month 639	Month 640	Month 641	Month 642	Month 643	Month 644	Month 645	Month 646	Month 647	Month 648	Month 649	Month 650	Month 651	Month 652	Month 653	Month 654	Month 655	Month 656	Month 657	Month 658	Month 659	Month 660	Month 661	Month 662	Month 663	Month 664	Month 665	Month 666	Month 667	Month 668	Month 669	Month 670	Month 671	Month 672	Month 673	Month 674	Month 675	Month 676	Month 677	Month 678	Month 679	Month 680	Month 681	Month 682	Month 683	Month 684	Month 685	Month 686	Month 687	Month 688	Month 689	Month 690	Month 691	Month 692	Month 693	Month 694	Month 695	Month 696	Month 697	Month 698	Month 699	Month 700	Month 701	Month 702	Month 703	Month 704	Month 705	Month 706	Month 707	Month 708	Month 709	Month 710	Month 711	Month 712	Month 713	Month 714	Month 715	Month 716	Month 717	Month 718	Month 719	Month 720	Month 721	Month 722	Month 723	Month 724	Month 725	Month 726	Month 727	Month 728	Month 729	Month 730	Month 731	Month 732	Month 733	Month 734	Month 735	Month 736	Month 737	Month 738	Month 739	Month 740	Month 741	Month 742	Month 743	Month 744	Month 745	Month 746	Month 747	Month 748	Month 749	Month 750	Month 751	Month 752	Month 753	Month 754	Month 755	Month 756	Month 757	Month 758	Month 759	Month 760	Month 761	Month 762	Month 763	Month 764	Month 765	Month 766	Month 767	Month 768	Month 769	Month 770	Month 771	Month 772	Month 773	Month 774	Month 775	Month 776	Month 777	Month 778	Month 779	Month 780	Month 781	Month 782	Month 783	Month 784	Month 785	Month 786	Month 787	Month 788	Month 789	Month 790	Month 791	Month 792	Month 793	Month 794	Month 795	Month 796	Month 797	Month 798	Month 799	Month 800	Month 801	Month 802	Month 803	Month 804	Month 805	Month 806	Month 807	Month 808	Month 809	Month 810	Month 811	Month 812	Month 813	Month 814	Month 815	Month 816	Month 817	Month 818	Month 819	Month 820	Month 821	Month 822	Month 823	Month 824	Month 825	Month 826	Month 827	Month 828	Month 829	Month 830	Month 831	Month 832	Month 833	Month 834	Month 835	Month 836	Month 837	Month 838	Month 839	Month 840	Month 841	Month 842	Month 843	Month 844	Month 845	Month 846	Month 847	Month 848	Month 849	Month 850	Month 851	Month 852	Month 853	Month 854	Month 855	Month 856	Month 857	Month 858	Month 859	Month 860	Month 861	Month 862	Month 863	Month 864	Month 865	Month 866	Month 867	Month 868	Month 869	Month 870	Month 871	Month 872	Month 873	Month 874	Month 875	Month 876	Month 877	Month 878	Month 879	Month 880	Month 881	Month 882	Month 883	Month 884	Month 885	Month 886	Month 887	Month 888	Month 889	Month 890	Month 891	Month 892	Month 893	Month 894	Month 895	Month 896	Month 897	Month 898	Month 899	Month 900	Month 901	Month 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Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

Series: Riverside County, CA, PG 12345678, BGS 12345678910, CRMT 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Offroad Equipment Emissions - Savira Solar Project - Mitigated Tier 4

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	600	14,801	3,538	1,987,357	81.5	80.8	18.9	pounds/year
2027	443	10,175	2,673	1,481,455	61.2	60.5	14.1	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.30	7.40	1.77	901	0.04	0.04	0.01	tons/year
2027	0.22	5.09	1.34	672	0.03	0.03	0.01	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	2.31	56.9	13.6		0.31	0.31	0.07	pounds/day, average
2027	1.70	39.1	10.3		0.24	0.23	0.05	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	5.32	134	28.9		0.73	0.73	0.17	pounds/day, maximum
2027	4.84	119	26.8		0.66	0.66	0.16	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

Sofia - Riverside Gating, CA - PO: 23064040, RBS: 23064040N - DRAFT ESTIMATE										CONTINUATION																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
Construction Week										Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	JAN	FEB	MARCH 12	MARCH 13	MARCH 14	MARCH 15	MARCH 16	MARCH 17	MARCH 18	MARCH 19	MARCH 20	MARCH 21	MARCH 22	MARCH 23	MARCH 24	MARCH 25	MARCH 26	MARCH 27	MARCH 28	MARCH 29	MARCH 30	MARCH 31	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	O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Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

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HV WORK

San Jose - Roseville, CA, CA - PO: 326046W, 3555.355466N - DRAFT ESTIMATE										CONSTRUCTION										JCC										JCC																															
Construction Month										Month 1		Month 2		Month 3		Month 4		Month 5		Month 6		Month 7		Month 8		Month 9		Month 10		Month 11		Month 12		Month 13		Month 14		Month 15		Month 16		Month 17		Month 18		Month 19		Month 20													
										1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
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Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

Service - Riverside County, CA - PG 2304WWS - BSC 2304WWS/IN - CRAFT ESTIMATE			CONSTRUCTION	MONTH 1	MONTH 2	MONTH 3	MONTH 4	MONTH 5	MONTH 6	MONTH 7	MONTH 8	MONTH 9	MONTH 10	MONTH 11	MONTH 12	MONTH 13	MONTH 14	MONTH 15	MONTH 16	MONTH 17	MONTH 18	MONTH 19	MONTH 20	MONTH 21	MONTH 22	MONTH 23	MONTH 24	MONTH 25	MONTH 26	MONTH 27	MONTH 28	MONTH 29	MONTH 30	MONTH 31	MONTH 32	MONTH 33	MONTH 34	MONTH 35	MONTH 36	MONTH 37	MONTH 38	MONTH 39	MONTH 40	MONTH 41	MONTH 42	MONTH 43	MONTH 44	MONTH 45	MONTH 46	MONTH 47	MONTH 48	MONTH 49	MONTH 50	MONTH 51	MONTH 52	MONTH 53	MONTH 54	MONTH 55	MONTH 56	MONTH 57	MONTH 58	MONTH 59	MONTH 60	MONTH 61	MONTH 62	MONTH 63	MONTH 64	MONTH 65	MONTH 66	MONTH 67	MONTH 68	MONTH 69	MONTH 70	MONTH 71	MONTH 72	MONTH 73	MONTH 74	MONTH 75	MONTH 76	MONTH 77	MONTH 78	MONTH 79	MONTH 80	MONTH 81	MONTH 82	MONTH 83	MONTH 84	MONTH 85	MONTH 86	MONTH 87	MONTH 88	MONTH 89	MONTH 90	MONTH 91	MONTH 92	MONTH 93	MONTH 94	MONTH 95	MONTH 96	MONTH 97	MONTH 98	MONTH 99	MONTH 100	MONTH 101	MONTH 102	MONTH 103	MONTH 104	MONTH 105	MONTH 106	MONTH 107	MONTH 108	MONTH 109	MONTH 110	MONTH 111	MONTH 112	MONTH 113	MONTH 114	MONTH 115	MONTH 116	MONTH 117	MONTH 118	MONTH 119	MONTH 120	MONTH 121	MONTH 122	MONTH 123	MONTH 124	MONTH 125	MONTH 126	MONTH 127	MONTH 128	MONTH 129	MONTH 130	MONTH 131	MONTH 132	MONTH 133	MONTH 134	MONTH 135	MONTH 136	MONTH 137	MONTH 138	MONTH 139	MONTH 140	MONTH 141	MONTH 142	MONTH 143	MONTH 144	MONTH 145	MONTH 146	MONTH 147	MONTH 148	MONTH 149	MONTH 150	MONTH 151	MONTH 152	MONTH 153	MONTH 154	MONTH 155	MONTH 156	MONTH 157	MONTH 158	MONTH 159	MONTH 160	MONTH 161	MONTH 162	MONTH 163	MONTH 164	MONTH 165	MONTH 166	MONTH 167	MONTH 168	MONTH 169	MONTH 170	MONTH 171	MONTH 172	MONTH 173	MONTH 174	MONTH 175	MONTH 176	MONTH 177	MONTH 178	MONTH 179	MONTH 180	MONTH 181	MONTH 182	MONTH 183	MONTH 184	MONTH 185	MONTH 186	MONTH 187	MONTH 188	MONTH 189	MONTH 190	MONTH 191	MONTH 192	MONTH 193	MONTH 194	MONTH 195	MONTH 196	MONTH 197	MONTH 198	MONTH 199	MONTH 200	MONTH 201	MONTH 202	MONTH 203	MONTH 204	MONTH 205	MONTH 206	MONTH 207	MONTH 208	MONTH 209	MONTH 210	MONTH 211	MONTH 212	MONTH 213	MONTH 214	MONTH 215	MONTH 216	MONTH 217	MONTH 218	MONTH 219	MONTH 220	MONTH 221	MONTH 222	MONTH 223	MONTH 224	MONTH 225	MONTH 226	MONTH 227	MONTH 228	MONTH 229	MONTH 230	MONTH 231	MONTH 232	MONTH 233	MONTH 234	MONTH 235	MONTH 236	MONTH 237	MONTH 238	MONTH 239	MONTH 240	MONTH 241	MONTH 242	MONTH 243	MONTH 244	MONTH 245	MONTH 246	MONTH 247	MONTH 248	MONTH 249	MONTH 250	MONTH 251	MONTH 252	MONTH 253	MONTH 254	MONTH 255	MONTH 256	MONTH 257	MONTH 258	MONTH 259	MONTH 260	MONTH 261	MONTH 262	MONTH 263	MONTH 264	MONTH 265	MONTH 266	MONTH 267	MONTH 268	MONTH 269	MONTH 270	MONTH 271	MONTH 272	MONTH 273	MONTH 274	MONTH 275	MONTH 276	MONTH 277	MONTH 278	MONTH 279	MONTH 280	MONTH 281	MONTH 282	MONTH 283	MONTH 284	MONTH 285	MONTH 286	MONTH 287	MONTH 288	MONTH 289	MONTH 290	MONTH 291	MONTH 292	MONTH 293	MONTH 294	MONTH 295	MONTH 296	MONTH 297	MONTH 298	MONTH 299	MONTH 300	MONTH 301	MONTH 302	MONTH 303	MONTH 304	MONTH 305	MONTH 306	MONTH 307	MONTH 308	MONTH 309	MONTH 310	MONTH 311	MONTH 312	MONTH 313	MONTH 314	MONTH 315	MONTH 316	MONTH 317	MONTH 318	MONTH 319	MONTH 320	MONTH 321	MONTH 322	MONTH 323	MONTH 324	MONTH 325	MONTH 326	MONTH 327	MONTH 328	MONTH 329	MONTH 330	MONTH 331	MONTH 332	MONTH 333	MONTH 334	MONTH 335	MONTH 336	MONTH 337	MONTH 338	MONTH 339	MONTH 340	MONTH 341	MONTH 342	MONTH 343	MONTH 344	MONTH 345	MONTH 346	MONTH 347	MONTH 348	MONTH 349	MONTH 350	MONTH 351	MONTH 352	MONTH 353	MONTH 354	MONTH 355	MONTH 356	MONTH 357	MONTH 358	MONTH 359	MONTH 360	MONTH 361	MONTH 362	MONTH 363	MONTH 364	MONTH 365	MONTH 366	MONTH 367	MONTH 368	MONTH 369	MONTH 370	MONTH 371	MONTH 372	MONTH 373	MONTH 374	MONTH 375	MONTH 376	MONTH 377	MONTH 378	MONTH 379	MONTH 380	MONTH 381	MONTH 382	MONTH 383	MONTH 384	MONTH 385	MONTH 386	MONTH 387	MONTH 388	MONTH 389	MONTH 390	MONTH 391	MONTH 392	MONTH 393	MONTH 394	MONTH 395	MONTH 396	MONTH 397	MONTH 398	MONTH 399	MONTH 400	MONTH 401	MONTH 402	MONTH 403	MONTH 404	MONTH 405	MONTH 406	MONTH 407	MONTH 408	MONTH 409	MONTH 410	MONTH 411	MONTH 412	MONTH 413	MONTH 414	MONTH 415	MONTH 416	MONTH 417	MONTH 418	MONTH 419	MONTH 420	MONTH 421	MONTH 422	MONTH 423	MONTH 424	MONTH 425	MONTH 426	MONTH 427	MONTH 428	MONTH 429	MONTH 430	MONTH 431	MONTH 432	MONTH 433	MONTH 434	MONTH 435	MONTH 436	MONTH 437	MONTH 438	MONTH 439	MONTH 440	MONTH 441	MONTH 442	MONTH 443	MONTH 444	MONTH 445	MONTH 446	MONTH 447	MONTH 448	MONTH 449	MONTH 450	MONTH 451	MONTH 452	MONTH 453	MONTH 454	MONTH 455	MONTH 456	MONTH 457	MONTH 458	MONTH 459	MONTH 460	MONTH 461	MONTH 462	MONTH 463	MONTH 464	MONTH 465	MONTH 466	MONTH 467	MONTH 468	MONTH 469	MONTH 470	MONTH 471	MONTH 472	MONTH 473	MONTH 474	MONTH 475	MONTH 476	MONTH 477	MONTH 478	MONTH 479	MONTH 480	MONTH 481	MONTH 482	MONTH 483	MONTH 484	MONTH 485	MONTH 486	MONTH 487	MONTH 488	MONTH 489	MONTH 490	MONTH 491	MONTH 492	MONTH 493	MONTH 494	MONTH 495	MONTH 496	MONTH 497	MONTH 498	MONTH 499	MONTH 500	MONTH 501	MONTH 502	MONTH 503	MONTH 504	MONTH 505	MONTH 506	MONTH 507	MONTH 508	MONTH 509	MONTH 510	MONTH 511	MONTH 512	MONTH 513	MONTH 514	MONTH 515	MONTH 516	MONTH 517	MONTH 518	MONTH 519	MONTH 520	MONTH 521	MONTH 522	MONTH 523	MONTH 524	MONTH 525	MONTH 526	MONTH 527	MONTH 528	MONTH 529	MONTH 530	MONTH 531	MONTH 532	MONTH 533	MONTH 534	MONTH 535	MONTH 536	MONTH 537	MONTH 538	MONTH 539	MONTH 540	MONTH 541	MONTH 542	MONTH 543	MONTH 544	MONTH 545	MONTH 546	MONTH 547	MONTH 548	MONTH 549	MONTH 550	MONTH 551	MONTH 552	MONTH 553	MONTH 554	MONTH 555	MONTH 556	MONTH 557	MONTH 558	MONTH 559	MONTH 560	MONTH 561	MONTH 562	MONTH 563	MONTH 564	MONTH 565	MONTH 566	MONTH 567	MONTH 568	MONTH 569	MONTH 570	MONTH 571	MONTH 572	MONTH 573	MONTH 574	MONTH 575	MONTH 576	MONTH 577	MONTH 578	MONTH 579	MONTH 580	MONTH 581	MONTH 582	MONTH 583	MONTH 584	MONTH 585	MONTH 586	MONTH 587	MONTH 588	MONTH 589	MONTH 590	MONTH 591	MONTH 592	MONTH 593	MONTH 594	MONTH 595	MONTH 596	MONTH 597	MONTH 598	MONTH 599	MONTH 600	MONTH 601	MONTH 602	MONTH 603	MONTH 604	MONTH 605	MONTH 606	MONTH 607	MONTH 608	MONTH 609	MONTH 610	MONTH 611	MONTH 612	MONTH 613	MONTH 614	MONTH 615	MONTH 616	MONTH 617	MONTH 618	MONTH 619	MONTH 620	MONTH 621	MONTH 622	MONTH 623	MONTH 624	MONTH 625	MONTH 626	MONTH 627	MONTH 628	MONTH 629	MONTH 630	MONTH 631	MONTH 632	MONTH 633	MONTH 634	MONTH 635	MONTH 636	MONTH 637	MONTH 638	MONTH 639	MONTH 640	MONTH 641	MONTH 642	MONTH 643	MONTH 644	MONTH 645	MONTH 646	MONTH 647	MONTH 648	MONTH 649	MONTH 650	MONTH 651	MONTH 652	MONTH 653	MONTH 654	MONTH 655	MONTH 656	MONTH 657	MONTH 658	MONTH 659	MONTH 660	MONTH 661	MONTH 662	MONTH 663	MONTH 664	MONTH 665	MONTH 666	MONTH 667	MONTH 668	MONTH 669	MONTH 670	MONTH 671	MONTH 672	MONTH 673	MONTH 674	MONTH 675	MONTH 676	MONTH 677	MONTH 678	MONTH 679	MONTH 680	MONTH 681	MONTH 682	MONTH 683	MONTH 684	MONTH 685	MONTH 686	MONTH 687	MONTH 688	MONTH 689	MONTH 690	MONTH 691	MONTH 692	MONTH 693	MONTH 694	MONTH 695	MONTH 696	MONTH 697	MONTH 698	MONTH 699	MONTH 700	MONTH 701	MONTH 702	MONTH 703	MONTH 704	MONTH 705	MONTH 706	MONTH 707	MONTH 708	MONTH 709	MONTH 710	MONTH 711	MONTH 712	MONTH 713	MONTH 714	MONTH 715	MONTH 716	MONTH 717	MONTH 718	MONTH 719	MONTH 720	MONTH 721	MONTH 722	MONTH 723	MONTH 724	MONTH 725	MONTH 726	MONTH 727	MONTH 728	MONTH 729	MONTH 730	MONTH 731	MONTH 732	MONTH 733	MONTH 734	MONTH 735	MONTH 736	MONTH 737	MONTH 738	MONTH 739	MONTH 740	MONTH 741	MONTH 742	MONTH 743	MONTH 744	MONTH 745	MONTH 746	MONTH 747	MONTH 748	MONTH 749	MONTH 750	MONTH 751	MONTH 752	MONTH 753	MONTH 754	MONTH 755	MONTH 756	MONTH 757	MONTH 758	MONTH 759	MONTH 760	MONTH 761	MONTH 762	MONTH 763	MONTH 764	MONTH 765	MONTH 766	MONTH 767	MONTH 768	MONTH 769	MONTH 770	MONTH 771	MONTH 772	MONTH 773	MONTH 774	MONTH 775	MONTH 776	MONTH 777	MONTH 778	MONTH 779	MONTH 780	MONTH 781	MONTH 782	MONTH 783	MONTH 784	MONTH 785	MONTH 786	MONTH 787	MONTH 788	MONTH 789	MONTH 790	MONTH 791	MONTH 792	MONTH 793	MONTH 794	MONTH 795	MONTH 796	MONTH 797	MONTH 798	MONTH 799	MONTH 800	MONTH 801	MONTH 802	MONTH 803	MONTH 804	MONTH 805	MONTH 806	MONTH 807	MONTH 808	MONTH 809	MONTH 810	MONTH 811	MONTH 812	MONTH 813	MONTH 814	MONTH 815	MONTH 816	MONTH 817	MONTH 818	MONTH 819	MONTH 820	MONTH 821	MONTH 822	MONTH 823	MONTH 824	MONTH 825	MONTH 826	MONTH 827	MONTH 828	MONTH 829	MONTH 830	MONTH 831	MONTH 832	MONTH 833	MONTH 834	MONTH 835	MONTH 836	MONTH 837	MONTH 838	MONTH 839	MONTH 840	MONTH 841	MONTH 842	MONTH 843	MONTH 844	MONTH 845	MONTH 846	MONTH 847	MONTH 848	MONTH 849	MONTH 850	MONTH 851	MONTH 852	MONTH 853	MONTH 854	MONTH 855	MONTH 856	MONTH 857	MONTH 858	MONTH 859	MONTH 860	MONTH 861	MONTH 862	MONTH 863	MONTH 864	MONTH 865	MONTH 866	MONTH 867	MONTH 868	MONTH 869	MONTH 870	MONTH 871	MONTH 872	MONTH 873	MONTH 874	MONTH 875	MONTH 876	MONTH 877	MONTH 878	MONTH 879	MONTH 880	MONTH 881	MONTH 882	MONTH 883	MONTH 884	MONTH 885	MONTH 886	MONTH 887	MONTH 888	MONTH 889	MONTH 890	MONTH 891	MONTH 892	MONTH 893	MONTH 894	MONTH 895	MONTH 896	MONTH 897	MONTH 898	MONTH 899	MONTH 900	MONTH 901	MONTH 902	MONTH 903	MONTH 904	MONTH 905	MONTH 906	MONTH 907	MONTH 908	MONTH 909	MONTH 910	MONTH 911	MONTH 912	MONTH 913	MONTH 914	MONTH 915	MONTH 916	MONTH 917	MONTH 918	MONTH 919	MONTH 920	MONTH 921	MONTH 922	MONTH 923	MONTH 924	MONTH 925	MONTH 926	MONTH 927	MONTH 928	MONTH 929	MONTH 930	MONTH 931	MONTH 932	MONTH 933	MONTH 934	MONTH 935	MONTH 936	MONTH 937	MONTH 938	MONTH 939	MONTH 940	MONTH 941	MONTH 942	MONTH 943	MONTH 944	MONTH 945	MONTH 946	MONTH 947	MONTH 948	MONTH 949	MONTH 950	MONTH 951	MONTH 952	MONTH 953	MONTH 954	MONTH 955	MONTH 956	MONTH 957
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Dust From Material Movement

Grading Equipment Passes

AP-42, 11.9

EF_{PM10} =1.542546 lb/VMT

EF_{PM2.5} =0.16655879 lb/VMT

Phase	Acres Graded	Grader Passes	Trenching (CY)	Work Days
Site Preparation and Grading	535	2	10,000	90

E = EF x VMT
VMT = As / Wb x 43,560 (sf/ac) / 5,280 (ft/mi)

Where:

E =emissions (lb)

PM₁₀ EF =1.542546 emission factor (lb/VMT)

PM_{2.5} EF =0.16655879 emission factor (lb/VMT)

VMT =368 vehicle miles traveled

As =535 acreage of the grading site (acre)

Wb =12 blade width of the grading equipment (CalEEMod default is 12 ft based on Caterpillar's 140 motor grader)

Phase	VMT	Pounds		Tons	
		PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}
EF (lb/VMT)		1.542546	0.16655879		
Site Preparation and Grading	368	12.6	1.36	0.01	0.00
Total		12.6	1.36	0.01	0.00

Trenching

AP-42, 13.2

EF = emission factor (lb/ton)
EF = K*(0.0032)*((U/5)^1.3)/((M/2)^1.4)

K_{PM10} = 0.35 PM₁₀ particle size multiplier (AP-42 default)
K_{PM2.5} = 0.053 PM_{2.5} particle size multiplier (AP-42 default)
U = 2.2 mean wind speed (meters/second) (CalEEMod default is 7.1 mph [2.2 m/s])
M = 12 material moisture content (%) (The moisture contents of different materials are listed in AP-42 Table 13.2.4-1. CalEEMod uses the moisture content of cover (12%) as default).

EF_{PM10} = 3.13541E-05
EF_{PM2.5} = 4.74791E-06

Phase	Tons	Pounds		Tons	
		PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}
EF (lb/ton)		3.13541E-05	4.74791E-06		
Site Preparation and Grading	12,642	0.00	0.00	0.00	0.00
Total	12,642	0.00	0.00	0.00	0.00

Notes:
Assumes 1.2641662 tons per CY based on a bulk density of 1.5 grams/cubic centimeter (per CalEEMod).

E = EF x TP
EF = emissions factor (lb/ton)
TP = throughput of loaded and unloaded materials (ton)

Grading+Trenching

Pounds		Tons	
PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}
12.61	1.36	0.01	0.00

	VOC Tons/Yr	CO Tons/Yr	NOx Tons/Yr	PM10 Tons/Yr	PM2.5 Tons/Yr	CO2 MT/Yr	SOx Tons/yr
Backup Generator - Well Operations	0.02	0.23	0.25	0.01	0.01	42	0.16
Backup Generator - O&M Operations	0.00	0.00	0.00	0.00	0.00	1	0.00
Employees	0.00	0.23	0.01	0.01	0.00	83	
Pickup Trucks	0.00	0.00	0.01	0.00	0.00	29	
Onsite Equipment	0.01	0.01	0.01	0.01	0.01	20	0.01
Annual Total	0.03	0.47	0.28	0.03	0.02	175	0.17
Daily Total	0.21	3.73	2.22	0.22	0.18	1,399	1.36

Worker Vehicle

Equipment Type:
Passenger Cars

Days	Trips /Day	Round Trip Length (mi)	Total Trips	Miles / Day	Total Miles
260	10	120	2,600	1,200	312,000

Pollutants	VOC		CO		NOX		CO2		PM10		PM2.5	
G/Mi	0.01		0.66		0.04		264.56		0.02		0.01	
Units	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	MT/ Day	MT/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr
Worker Vehicle	0.02	0.00	1.74	0.23	0.10	0.01	0.32	83	0.04	0.01	0.01	0.00

On-Road Pickup

Equipment Type:
Passenger Trucks

Days	Trips /Day	Round Trip Length (mi)	Total Trips	Miles / Day	Total Miles
260	2	60	520	120	31,200

Pollutants	VOC		CO		NOX		CO2		PM10		PM2.5	
G/Mi	0.01		0.03		0.27		938.62		0.06		0.02	
Units	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	MT/ Day	MT/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr
Pickup Truck	0.00	0.00	0.01	0.00	0.07	0.01	0.11	29	0.02	0.00	0.01	0.00

Forklifts and manlifts would be used during routine maintenance activities, estimated to be once per week for 6 hours, or an average of one hour per day.

Weed abatement equipment (chemical or mechanical) would occur approximately twice per year, for 2 to 3 days per occurrence.

Approximately one pickup truck or ATV will be used an average of 4 hours per day.

Attachment A2

Cumulative Emissions Inventory Supporting Information

- **Construction Summary**

Unmitigated and Mitigated

- **Construction Employee Vehicles and Haul Trucks**

Unmitigated and Mitigated

- **Construction Offroad Equipment**

Unmitigated and Mitigated

Grand Total Emissions - Redonda Solar Project - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	1,659	21,875	12,076	7,347,523	23,943	2,932	70.7	pounds/year
2027	818	12,441	6,038	4,438,256	17,189	1,991	43.0	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.83	10.9	6.04	3,333	12.0	1.47	0.04	tons/year
2027	0.41	6.22	3.02	2,013	8.59	1.00	0.02	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	6.38	84.1	46.4		92.1	11.3	0.27	pounds/day, average
2027	3.14	47.9	23.2		66.1	7.66	0.17	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	15.9	222	116		283	33.4	0.75	pounds/day, maximum
2027	9.67	161	71.0		255	28.8	0.57	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Grand Total Emissions - Redonda Solar Project - Mitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	1,198	35,899	7,106	7,347,523	3,168	450	83.7	pounds/year
2027	582	17,131	3,686	4,438,256	1,985	285	55.2	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.60	17.9	3.55	3,333	1.58	0.23	0.04	tons/year
2027	0.29	8.57	1.84	2,013	0.99	0.14	0.03	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	4.61	138	27.3		12.2	1.73	0.32	pounds/day, average
2027	2.24	65.9	14.2		7.63	1.10	0.21	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	11.3	358	62.4		34.5	4.90	0.89	pounds/day, maximum
2027	6.96	220	43.2		31.4	4.03	0.71	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Onroad Vehicle Emissions - Redonda Solar Project - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	97.2	7,976	682	3,680,691	22,772	2,319	35.9 pounds/year
2027	64.4	5,456	485	2,706,784	16,812	1,711	26.5 pounds/year
2028	-	-	-	-	-	-	- pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	0.05	3.99	0.34	1,670	11.4	1.16	0.02 tons/year
2027	0.03	2.73	0.24	1,228	8.41	0.86	0.01 tons/year
2028	-	-	-	-	-	-	- tons/year
Threshold	25	100	25		70	70	100
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	0.37	30.7	2.62		87.6	8.92	0.14 pounds/day, average
2027	0.25	21.0	1.86		64.7	6.58	0.10 pounds/day, average
2028	-	-	-		-	-	- pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	1.18	97.2	7.86		273	27.8	0.43 pounds/day, maximum
2027	0.97	83.0	6.67		248	25.3	0.38 pounds/day, maximum
2028	-	-	-		-	-	- pounds/day, maximum
Threshold	75	550	100		150	55	150

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bss install

HV WORK

[illegible]

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - Inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

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Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

HV WORK

[illegible]

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

HV WORK

Material and Equipment Deliveries - PV

Onroad Vehicle Emissions - Redonda Solar Project - Mitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx		
2026	97.2	7,976	682	3,680,691	2,446	287	48.9	pounds/year	
2027	64.4	5,456	485	2,706,784	1,832	213	38.7	pounds/year	
2028	-	-	-	-	-	-	-	pounds/year	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx		
2026	0.05	3.99	0.34	1,670	1.22	0.14	0.02	tons/year	187,378 gallons/year
2027	0.03	2.73	0.24	1,228	0.92	0.11	0.02	tons/year	137,798 gallons/year
2028	-	-	-	-	-	-	-	tons/year	- gallons/year
Threshold	25	100	25		70	70	100		
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx		
2026	0.37	30.7	2.62		9.41	1.10	0.19	pounds/day, average	
2027	0.25	21.0	1.86		7.04	0.82	0.15	pounds/day, average	
2028	-	-	-		-	-	-	pounds/day, average	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx		
2026	1.18	97.2	7.86		29.0	3.41	0.57	pounds/day, maximum	
2027	0.97	83.0	6.67		26.5	3.10	0.52	pounds/day, maximum	
2028	-	-	-		-	-	-	pounds/day, maximum	
Threshold	75	550	100		150	55	150		

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

HV WORK

[illegible]

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

HV WORK

[illegible]

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

HV WORK

[illegible]

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

HV WORK

Material and Equipment Deliveries - PV

Offroad Equipment Emissions - Redoda Solar Project - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	1,562	13,898	11,394	3,666,832	599	551	34.8	pounds/year
2027	753	6,985	5,553	1,731,472	295	272	16.5	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.78	6.95	5.70	1,663	0.30	0.28	0.02	tons/year
2027	0.38	3.49	2.78	785	0.15	0.14	0.01	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	6.01	53.5	43.8		2.30	2.12	0.13	pounds/day, average
2027	2.90	26.9	21.4		1.14	1.05	0.06	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	14.8	125	108		5.58	5.14	0.33	pounds/day, maximum
2027	8.71	78.5	64.3		3.36	3.09	0.19	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

Reference: FY 2020/21, R01 20M/4/21										CONSTRUCTION	Construction Month				Month 1				Month 2				Month 3				Month 4				Month 5				Month 6				Month 7				Month 8				Month 9				Month 10				Month 11				Month 12				JAN				FEB				MARCH				APR				MAY				JUNE				JULY				AUG				SEPT				OCT				NOV				DEC																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
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Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

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HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

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HV WORK

Reference: FY 2024/25/26/27/28/29/30/31/32/33/34/35/36/37/38/39/40/41/42/43/44/45/46/47/48/49/50/51/52/53/54/55/56/57/58/59/60/61/62/63/64/65/66/67/68/69/70/71/72/73/74/75/76/77/78/79/80/81/82/83/84/85/86/87/88/89/90/91/92/93/94/95/96/97/98/99/100/101/102/103/104/105/106/107/108/109/110/111/112/113/114/115/116/117/118/119/120/121/122/123/124/125/126/127/128/129/130/131/132/133/134/135/136/137/138/139/140/141/142/143/144/145/146/147/148/149/150/151/152/153/154/155/156/157/158/159/160/161/162/163/164/165/166/167/168/169/170/171/172/173/174/175/176/177/178/179/180/181/182/183/184/185/186/187/188/189/190/191/192/193/194/195/196/197/198/199/200/201/202/203/204/205/206/207/208/209/210/211/212/213/214/215/216/217/218/219/220/221/222/223/224/225/226/227/228/229/230/231/232/233/234/235/236/237/238/239/240/241/242/243/244/245/246/247/248/249/250/251/252/253/254/255/256/257/258/259/260/261/262/263/264/265/266/267/268/269/270/271/272/273/274/275/276/277/278/279/280/281/282/283/284/285/286/287/288/289/290/291/292/293/294/295/296/297/298/299/300/301/302/303/304/305/306/307/308/309/310/311/312/313/314/315/316/317/318/319/320/321/322/323/324/325/326/327/328/329/330/331/332/333/334/335/336/337/338/339/340/341/342/343/344/345/346/347/348/349/350/351/352/353/354/355/356/357/358/359/360/361/362/363/364/365/366/367/368/369/370/371/372/373/374/375/376/377/378/379/380/381/382/383/384/385/386/387/388/389/390/391/392/393/394/395/396/397/398/399/400/401/402/403/404/405/406/407/408/409/410/411/412/413/414/415/416/417/418/419/420/421/422/423/424/425/426/427/428/429/430/431/432/433/434/435/436/437/438/439/440/441/442/443/444/445/446/447/448/449/450/451/452/453/454/455/456/457/458/459/460/461/462/463/464/465/466/467/468/469/470/471/472/473/474/475/476/477/478/479/480/481/482/483/484/485/486/487/488/489/490/491/492/493/494/495/496/497/498/499/500/501/502/503/504/505/506/507/508/509/510/511/512/513/514/515/516/517/518/519/520/521/522/523/524/525/526/527/528/529/530/531/532/533/534/535/536/537/538/539/540/541/542/543/544/545/546/547/548/549/550/551/552/553/554/555/556/557/558/559/560/561/562/563/564/565/566/567/568/569/570/571/572/573/574/575/576/577/578/579/580/581/582/583/584/585/586/587/588/589/590/591/592/593/594/595/596/597/598/599/600/601/602/603/604/605/606/607/608/609/610/611/612/613/614/615/616/617/618/619/620/621/622/623/624/625/626/627/628/629/630/631/632/633/634/635/636/637/638/639/640/641/642/643/644/645/646/647/648/649/650/651/652/653/654/655/656/657/658/659/660/661/662/663/664/665/666/667/668/669/670/671/672/673/674/675/676/677/678/679/680/681/682/683/684/685/686/687/688/689/690/691/692/693/694/695/696/697/698/699/700/701/702/703/704/705/706/707/708/709/710/711/712/713/714/715/716/717/718/719/720/721/722/723/724/725/726/727/728/729/730/731/732/733/734/735/736/737/738/739/740/741/742/743/744/745/746/747/748/749/750/751/752/753/754/755/756/757/758/759/760/761/762/763/764/765/766/767/768/769/770/771/772/773/774/775/776/777/778/779/780/781/782/783/784/785/786/787/788/789/790/791/792/793/794/795/796/797/798/799/800/801/802/803/804/805/806/807/808/809/810/811/812/813/814/815/816/817/818/819/820/821/822/823/824/825/826/827/828/829/830/831/832/833/834/835/836/837/838/839/840/841/842/843/844/845/846/847/848/849/850/851/852/853/854/855/856/857/858/859/860/861/862/863/864/865/866/867/868/869/870/871/872/873/874/875/876/877/878/879/880/881/882/883/884/885/886/887/888/889/890/891/892/893/894/895/896/897/898/899/900/901/902/903/904/905/906/907/908/909/910/911/912/913/914/915/916/917/918/919/920/921/922/923/924/925/926/927/928/929/930/931/932/933/934/935/936/937/938/939/940/941/942/943/944/945/946/947/948/949/950/951/952/953/954/955/956/957/958/959/960/961/962/963/964/965/966/967/968/969/970/971/972/973/974/975/976/977/978/979/980/981/982/983/984/985/986/987/988/989/990/991/992/993/994/995/996/997/998/999/1000																																																																																																			
Construction Week		Month 1		Month 2		Month 3		Month 4		Month 5		Month 6		Month 7		Month 8		Month 9		Month 10		Month 11		Month 12		Month 13		Month 14		Month 15		Month 16		Month 17		Month 18		Month 19		Month 20		Month 21		Month 22		Month																																																					
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	8													

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

Reference: PO: 20060000, 003, 20060000		CONSTRUCTION		CONSTRUCTION WEEK																																																																																																																								HC												EC											
		Month 1				Month 2				Month 3				Month 4				Month 5				Month 6				Month 7				Month 8				Month 9				Month 10				Month 11				Month 12				Month 13				Month 14				Month 15																																																																																									
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Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

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Offroad Equipment Emissions - Redonda Solar Project - Mitigated Tier 4

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	1,101	27,922	6,425	3,666,832	149	148	34.8	pounds/year
2027	517	11,674	3,202	1,731,472	71.2	70.4	16.5	pounds/year
2028	-	-	-	-	-	-	-	pounds/year

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.55	14.0	3.21	1,663	0.07	0.07	0.02	tons/year
2027	0.26	5.84	1.60	785	0.04	0.04	0.01	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	4.24	107	24.7		0.57	0.57	0.13	pounds/day, average
2027	1.99	44.9	12.3		0.27	0.27	0.06	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	10.1	261	54.6		1.39	1.38	0.33	pounds/day, maximum
2027	5.99	137	36.6		0.83	0.82	0.19	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

Reference: PO_2004400_003_2004400v01r01			CONSTRUCTION		Month 1		Month 2		Month 3		Month 4		Month 5		Month 6		Month 7		Month 8		Month 9		Month 10		Month 11		Month 12		Month 13		Month 14		Month 15		Month 16		Month 17		Month 18		Month 19		Month 20		Month 21		Month 22		Month 23		Month 24		Month 25		Month 26		Month 27		Month 28		Month 29		Month 30		Month 31		Month 32		Month 33		Month 34		Month 35		Month 36		Month 37		Month 38		Month 39		Month 40		Month 41		Month 42		Month 43		Month 44		Month 45		Month 46		Month 47		Month 48		Month 49		Month 50		Month 51		Month 52		Month 53		Month 54		Month 55		Month 56		Month 57		Month 58		Month 59		Month 60		Month 61		Month 62		Month 63		Month 64		Month 65		Month 66		Month 67		Month 68		Month 69		Month 70		Month 71		Month 72		Month 73		Month 74		Month 75		Month 76		Month 77		Month 78		Month 79		Month 80		Month 81		Month 82		Month 83		Month 84		Month 85		Month 86		Month 87		Month 88		Month 89		Month 90		Month 91		Month 92		Month 93		Month 94		Month 95		Month 96		Month 97		Month 98		Month 99		Month 100		Month 101		Month 102		Month 103		Month 104		Month 105		Month 106		Month 107		Month 108		Month 109		Month 110		Month 111		Month 112		Month 113		Month 114		Month 115		Month 116		Month 117		Month 118		Month 119		Month 120		Month 121		Month 122		Month 123		Month 124		Month 125		Month 126		Month 127		Month 128		Month 129		Month 130		Month 131		Month 132		Month 133		Month 134		Month 135		Month 136		Month 137		Month 138		Month 139		Month 140		Month 141		Month 142		Month 143		Month 144		Month 145		Month 146		Month 147		Month 148		Month 149		Month 150		Month 151		Month 152		Month 153		Month 154		Month 155		Month 156		Month 157		Month 158		Month 159		Month 160		Month 161		Month 162		Month 163		Month 164		Month 165		Month 166		Month 167		Month 168		Month 169		Month 170		Month 171		Month 172		Month 173		Month 174		Month 175		Month 176		Month 177		Month 178		Month 179		Month 180		Month 181		Month 182		Month 183		Month 184		Month 185		Month 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Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

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Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

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Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

Stage 3 - inverter, pile racking, module, bess install, commissioning/testing

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching

Stage 2 - Cable install, trench backfill, pile and racking install, inverter install, module install, bess install

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Dust From Material Movement

Grading Equipment Passes

AP-42, 11.9

EF _{PM10} =	1.542546 lb/VMT	Phase	Acres Graded	Grader Passes	Trenching (CY)	Work Days
EF _{PM2.5} =	0.16655879 lb/VMT	Site Preparation and Grading	868	2	30,000	90

E = EF x VMT
VMT = As / Wb x 43,560 (sf/ac) / 5,280 (ft/mi)

Where:

E =

emissions (lb)

PM₁₀ EF =

1.542546 emission factor (lb/VMT)

PM_{2.5} EF =

0.16655879 emission factor (lb/VMT)

VMT =

597 vehicle miles traveled

As =

868 acreage of the grading site (acre)

Wb =

12 blade width of the grading equipment (CalEEMod default is 12 ft based on Caterpillar's 140 motor grader)

Phase	VMT	Pounds		Tons	
		PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}
EF (lb/VMT)		1.542546	0.16655879		
Site Preparation and Grading	597	20.5	2.21	0.01	0.00
Total		20.5	2.21	0.01	0.00

Trenching

AP-42, 13.2

EF = emission factor (lb/ton)
EF = $K * (0.0032) * ((U/5)^{1.3}) / ((M/2)^{1.4})$

K_{PM10} = 0.35 PM₁₀ particle size multiplier (AP-42 default)
K_{PM2.5} = 0.053 PM_{2.5} particle size multiplier (AP-42 default)
U = 2.2 mean wind speed (meters/second) (CalEEMod default is 7.1 mph [2.2 m/s])
M = 12 material moisture content (%) (The moisture contents of different materials are listed in AP-42 Table 13.2.4-1. CalEEMod uses the moisture content of cover (12%) as default).

EF_{PM10} = 3.13541E-05
EF_{PM2.5} = 4.74791E-06

Phase	Tons	Pounds		Tons	
		PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}
EF (lb/ton)		3.13541E-05	4.74791E-06		
Site Preparation and Grading	37,925	0.01	0.00	0.00	0.00
Total	37,925	0.01	0.00	0.00	0.00

Notes:
Assumes 1.2641662 tons per CY based on a bulk density of 1.5 grams/cubic centimeter (per CalEEMod).

E = EF x TP
EF = emissions factor (lb/ton)
TP = throughput of loaded and unloaded materials (ton)

Grading+Trenching	Pounds		Tons	
	PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}
	20.5	2.21	0.01	0.00

	VOC Tons/Yr	CO Tons/Yr	NOx Tons/Yr	PM10 Tons/Yr	PM2.5 Tons/Yr	CO2 MT/Yr	SOx Tons/yr
Backup Generator - Well Operations	0.02	0.23	0.25	0.01	0.01	42	0.16
Backup Generator - O&M Operations	0.00	0.00	0.00	0.00	0.00	1	0.00
Employees	0.00	0.23	0.01	0.01	0.00	83	
Pickup Trucks	0.00	0.00	0.01	0.00	0.00	29	
Onsite Equipment	0.01	0.01	0.01	0.01	0.01	20	0.01
Annual Total	0.03	0.47	0.28	0.03	0.02	175	0.17
Daily Total	0.21	3.73	2.22	0.22	0.18	1,399	1.36

Worker Vehicle

Equipment Type:
Passenger Cars

Days	Trips /Day	Round Trip Length (mi)	Total Trips	Miles / Day	Total Miles
260	10	120	2,600	1,200	312,000

Pollutants	VOC		CO		NOX		CO2		PM10		PM2.5	
G/Mi	0.01		0.66		0.04		264.56		0.02		0.01	
Units	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	MT/ Day	MT/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr
Worker Vehicle	0.02	0.00	1.74	0.23	0.10	0.01	0.32	83	0.04	0.01	0.01	0.00

On-Road Pickup

Equipment Type:
Passenger Trucks

Days	Trips /Day	Round Trip Length (mi)	Total Trips	Miles / Day	Total Miles
260	2	60	520	120	31,200

Pollutants	VOC		CO		NOX		CO2		PM10		PM2.5	
G/Mi	0.01		0.03		0.27		938.62		0.06		0.02	
Units	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	MT/ Day	MT/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr
Pickup Truck	0.00	0.00	0.01	0.00	0.07	0.01	0.11	29	0.02	0.00	0.01	0.00

Forklifts and manlifts would be used during routine maintenance activities, estimated to be once per week for 6 hours, or an average of one hour per day.

Weed abatement equipment (chemical or mechanical) would occur approximately twice per year, for 2 to 3 days per occurrence.

Approximately one pickup truck or ATV will be used an average of 4 hours per day.

Grand Total Emissions - Savira and Redonda Solar Projects - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	2,565	34,009	18,842	11,444,047	51,269	5,965	110	pounds/year
2027	1,488	21,152	11,064	7,491,207	37,726	4,270	72.4	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	1.28	17.0	9.42	5,191	25.6	2.98	0.06	tons/year
2027	0.74	10.6	5.53	3,398	18.9	2.14	0.04	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	9.87	131	72.5		197	22.9	0.42	pounds/day, average
2027	5.72	81.4	42.6		145	16.4	0.28	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	24.4	341	180		607	68.5	1.15	pounds/day, maximum
2027	17.1	271	124		554	61.0	0.95	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Grand Total Emissions - Savira and Redonda Solar Projects - Mitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	1,852	55,041	11,048	11,439,280	5,686	841	123	pounds/year
2027	1,059	30,120	6,662	7,491,207	4,322	597	84.6	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.93	27.5	5.52	5,189	2.84	0.42	0.06	tons/year
2027	0.53	15.1	3.33	3,398	2.16	0.30	0.04	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	7.12	212	42.5		21.9	3.23	0.47	pounds/day, average
2027	4.07	116	25.6		16.6	2.30	0.33	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	17.2	541	95.7		65.5	9.20	1.29	pounds/day, maximum
2027	12.3	385	73.9		59.9	8.04	1.08	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Onroad Vehicle Emissions - Savira and Redonda Solar Projects - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	151	12,331	1,086	5,789,858	49,409	5,006	56.6	pounds/year
2027	98.6	8,271	787	4,278,280	36,125	3,657	41.9	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.08	6.17	0.54	2,626	24.7	2.50	0.03	tons/year
2027	0.05	4.14	0.39	1,941	18.1	1.83	0.02	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.58	47.4	4.18		190	19.3	0.22	pounds/day, average
2027	0.38	31.8	3.03		139	14.1	0.16	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	1.83	151	12.4		592	60.0	0.67	pounds/day, maximum
2027	1.51	129	10.6		541	54.8	0.60	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Onroad Vehicle Emissions - Savira and Redonda Solar Projects - Mitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	151	12,318	1,085	5,785,091	5,224	587	69.5	pounds/year
2027	98.6	8,271	787	4,278,280	3,925	437	54.1	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.08	6.16	0.54	2,624	2.61	0.29	0.03	tons/year
2027	0.05	4.14	0.39	1,941	1.96	0.22	0.03	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.58	47.4	4.17		20.1	2.26	0.27	pounds/day, average
2027	0.38	31.8	3.03		15.1	1.68	0.21	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	1.83	151	12.4		61.8	6.98	0.81	pounds/day, maximum
2027	1.51	129	10.6		56.8	6.38	0.74	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

Offroad Equipment Emissions - Savira and Redonda Solar Projects - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	2,414	21,678	17,756	5,654,189	934	859	53.6 pounds/year
2027	1,390	12,881	10,277	3,212,927	542	499	30.6 pounds/year
2028	-	-	-	-	-	-	- pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	1.21	10.8	8.88	2,565	0.47	0.43	0.03 tons/year
2027	0.69	6.44	5.14	1,457	0.27	0.25	0.02 tons/year
2028	-	-	-	-	-	-	- tons/year
Threshold	25	100	25		70	70	100
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	9.29	83.4	68.3		3.59	3.31	0.21 pounds/day, average
2027	5.34	49.5	39.5		2.08	1.92	0.12 pounds/day, average
2028	-	-	-		-	-	- pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2026	22.6	194	168		8.64	7.95	0.50 pounds/day, maximum
2027	15.6	142	114		5.98	5.50	0.35 pounds/day, maximum
2028	-	-	-		-	-	- pounds/day, maximum
Threshold	75	550	100		150	55	150

Offroad Equipment Emissions - Savira and Redonda Solar Projects - Mitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	1,701	42,723	9,963	5,654,189	231	229	53.6	pounds/year
2027	960	21,849	5,875	3,212,927	132	131	30.6	pounds/year
2028	-	-	-	-	-	-	-	pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	0.85	21.4	4.98	2,565	0.12	0.11	0.03	tons/year
2027	0.48	10.9	2.94	1,457	0.07	0.07	0.02	tons/year
2028	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	6.54	164	38.3		0.89	0.88	0.21	pounds/day, average
2027	3.69	84.0	22.6		0.51	0.50	0.12	pounds/day, average
2028	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2026	15.4	394	83.5		2.12	2.10	0.50	pounds/day, maximum
2027	10.8	256	63.3		1.50	1.48	0.35	pounds/day, maximum
2028	-	-	-		-	-	-	pounds/day, maximum
Threshold	75	550	100		150	55	150	

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Construction Month					Month 1		Month 2		Month 3				Month 4				Month 5				Month 6				Month 7				Month 8				Month 9				Month 10				Month 11				Month 12				Month 13				Month 14				Month 15																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
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Grand Total Emissions - Bajada Solar Project - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	2,083	33,302	12,542	12,007,221	117,125	12,319	116.0	pounds/year
2029	637	14,406	3,998	5,269,169	70,752	7,288	51.4	pounds/year
2030								pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	1.04	16.7	6.27	5,446	58.6	6.16	0.06	tons/year
2029	0.32	7.20	2.00	2,390	35.4	3.64	0.03	tons/year
2030	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	8.01	128	48.2		450	47.4	0.45	pounds/day, average
2029	2.45	55.4	15.4		272	28.0	0.20	pounds/day, average
2030	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	13.5	204	80.6		872	90.3	0.72	pounds/day, maximum
2029	9.67	191	58.5		871	90.1	0.69	pounds/day, maximum
2030								pounds/day, maximum
Threshold	75	550	100		150	55	150	

Grand Total Emissions - Bajada Solar Project - Mitigated Tier 4

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	1,759	53,511	10,606	12,007,221	12,478	1,520	116.0	pounds/year
2029	524	17,228	3,162	5,269,169	7,104	814	51.4	pounds/year
2030								pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	0.88	26.8	5.30	5,446	6.24	0.76	0.06	tons/year
2029	0.26	8.61	1.58	2,390	3.55	0.41	0.03	tons/year
2030	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	6.76	206	40.8		48.0	5.85	0.45	pounds/day, average
2029	2.01	66.3	12.2		27.3	3.13	0.20	pounds/day, average
2030	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	11.2	342	61.7		87.7	10.2	0.72	pounds/day, maximum
2029	7.85	256	47.0		87.7	10.2	0.69	pounds/day, maximum
2030								pounds/day, maximum
Threshold	75	550	100		150	55	150	

Onroad Vehicle Emissions - Bajada Solar Project - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2028	151	13,328	1,115	6,659,014	114,535	11,528	65.3 pounds/year
2029	87.5	8,221	572	3,846,146	70,551	7,103	37.8 pounds/year
2030							pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2028	0.08	6.66	0.56	3,020	57.3	5.76	0.03 tons/year
2029	0.04	4.11	0.29	1,745	35.3	3.55	0.02 tons/year
2030	-	-	-	-	-	-	- tons/year
Threshold	25	100	25		70	70	100
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2028	0.58	51.3	4.29		441	44.3	0.25 pounds/day, average
2029	0.34	31.6	2.20		271	27.3	0.15 pounds/day, average
2030	-	-	-		-	-	- pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2028	1.17	105	7.97		868	87.4	0.48 pounds/day, maximum
2029	1.08	101	7.06		868	87.4	0.47 pounds/day, maximum
2030							pounds/day, maximum
Threshold	75	550	100		150	55	150

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bass install

Stage 3 - Inverter, pile racking, module, base install, commissioning/testing

	HV WORK	STAGE 2 - DESIGN, PRE-PLANNING, MEASURE, TEST MODEL, COMMUNICATION, REVIEW
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SUBJECT		SUBJECT								SUBJECT								SUBJECT								SUBJECT								SUBJECT																																													
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Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site drill

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bss install

Stage 3 - Inverter, pile racking, module, bess install, commissioning/teuling

HV WORK

- [ESOMAR PV / ESOMAR PER ESS](#)

Construction Month
Construction Week

EPC (26 months)
HV (12 months)
BESS (17 months)
CIG (26 months)
Total Craft

EPC (26 months)
HV (12 months)
BESS (17 months)
CIG (26 months)
Total Craft

EPC (26 months)
 HV (13 months)
 BSS (17 months)
 CSO (26 months)
 Total Craft

Material and Equipment Deliveries - PV

Construction Mode

Total

Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site drill

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bss install

Stage 3 - inverter, p/e racking, module, bss install, commissioning/teuling

HV WORK

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Construction Week

EPC (26 months)	100%
NV (32 months)	100%
BSB (17 months)	100%
CSG (26 months)	100%
Total Craft	100%
EPC (26 months)	100%
NV (32 months)	100%
BSB (17 months)	100%
CSG (26 months)	100%
Total Craft	100%

Material and Equipment Deliveries - PV

Construction Month

Total

Total

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bss install

Stage 3 - inverter, pile racking, module, bss install, commissioning/hauling

[illegible]

Onroad Vehicle Emissions - Bajada Solar Project - Mitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2028	151	13,328	1,115	6,659,014	11,771	1,252	65.3 pounds/year
2029	87.5	8,221	572	3,846,146	7,041	752	37.8 pounds/year
2030							pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2028	0.08	6.66	0.56	3,020	5.89	0.63	0.03 tons/year
2029	0.04	4.11	0.29	1,745	3.52	0.38	0.02 tons/year
2030	-	-	-	-	-	-	- tons/year
Threshold	25	100	25		70	70	100
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2028	0.58	51.3	4.29		45.3	4.81	0.25 pounds/day, average
2029	0.34	31.6	2.20		27.1	2.89	0.15 pounds/day, average
2030	-	-	-		-	-	- pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx
2028	1.17	105	7.97		86.7	9.27	0.48 pounds/day, maximum
2029	1.08	101	7.06		86.7	9.26	0.47 pounds/day, maximum
2030							pounds/day, maximum
Threshold	75	550	100		150	55	150

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site drill

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, base install

Stage 3 - inverter, pile racking, module, bess install, commissioning/tearing

HV WORK

3 - ISOMIRK PV / ISOMIRK, REV 8555
Construction Month

Construction Week

EPC (26 months)	100%
HV (18 months)	100%
BESS (17 months)	100%
CSG (26 months)	100%
Total Craft	100%
EPC (26 months)	100%
HV (18 months)	100%
BESS (17 months)	100%
CSG (26 months)	100%
Total Craft	100%

Material and Equipment Deliveries - PV

Construction Mode

Total

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bss install

Stage 3 - inverter, p/e racking, module, bss install, commissioning/hauling

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site drill

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bss install

Stage 3 - inverter, pile racking, module, bees install, commissioning/teething

HV WORK

3 - ISOMIRK PV / ISOMIRK, REV 8555
Construction Month

Construction Week

EPC (26 months)	100%
HV (12 months)	100%
BESS (17 months)	100%
CSG (26 months)	100%
Total Craft	100%

EPC (26 months)	100%
HV (12 months)	100%
BESS (17 months)	100%
CSG (26 months)	100%
Total Craft	100%

EPC (26 months)
 HV (18 months)
 BSS (17 months)
 CS (26 months)
 Total Graft

Material and Equipment Deliveries - PV

Construction Mode

Total

Offroad Equipment Emissions - Bajada Solar Project - Unmitigated

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	1,932	19,974	11,427	5,348,207	630	579	50.7	pounds/year
2029	550	6,185	3,426	1,423,023	202	186	13.5	pounds/year
2030								pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	0.97	9.99	5.71	2,426	0.31	0.29	0.03	tons/year
2029	0.27	3.09	1.71	645	0.10	0.09	0.01	tons/year
2030	-	-	-	-	-	-	-	tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	7.43	76.8	43.9		2.42	2.23	0.20	pounds/day, average
2029	2.11	23.8	13.2		0.78	0.71	0.05	pounds/day, average
2030	-	-	-		-	-	-	pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	12.6	125	73.9		3.96	3.64	0.33	pounds/day, maximum
2029	8.59	90.3	51.5		2.88	2.65	0.22	pounds/day, maximum
2030								pounds/day, maximum
Threshold	75	550	100		150	55	150	

Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

Project: 2024W07/PJ/2024W07/JAN-BESS				CONSTRUCTION																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
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Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

Report: 30/09/2024 PJ2 J0000/2024 B155										CONSTRUCTION																																																																																																			
Construction Week										Month 1		Month 2		Month 3		Month 4		Month 5		Month 6		Month 7		Month 8		Month 9		Month 10		Month 11		Month 12		JAN		FEB		MARCH 12		MARCH 13		MARCH 14		MARCH 15		MARCH 16		MARCH 17		MARCH 18		MARCH 19		MARCH 20																																																							
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Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

Figure: 3550000 PJZ 3550000/200 M355										CONSTRUCTION																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
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Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

Report: 31500000_PJ2_31500000_AIR_0015										CONSTRUCTION	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	Month 13	Month 14	Month 15	Month 16	Month 17	Month 18	Month 19	Month 20	Month 21	Month 22	Month 23	Month 24	Month 25	Month 26	Month 27	Month 28	Month 29	Month 30	Month 31	Month 32	Month 33	Month 34	Month 35	Month 36	Month 37	Month 38	Month 39	Month 40	Month 41	Month 42	Month 43	Month 44	Month 45	Month 46	Month 47	Month 48	Month 49	Month 50	Month 51	Month 52	Month 53	Month 54	Month 55	Month 56	Month 57	Month 58	Month 59	Month 60	Month 61	Month 62	Month 63	Month 64	Month 65	Month 66	Month 67	Month 68	Month 69	Month 70	Month 71	Month 72	Month 73	Month 74	Month 75	Month 76	Month 77	Month 78	Month 79	Month 80	Month 81	Month 82	Month 83	Month 84	Month 85	Month 86	Month 87	Month 88	Month 89	Month 90	Month 91	Month 92	Month 93	Month 94	Month 95	Month 96	Month 97	Month 98	Month 99	Month 100	Month 101	Month 102	Month 103	Month 104	Month 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Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

HV WORK

MONTH 1				MONTH 2				MONTH 3				MONTH 4				MONTH 5				MONTH 6				MONTH 7				MONTH 8				MONTH 9				MONTH 10				MONTH 11				MONTH 12				MONTH 13				MONTH 14				MONTH 15				MONTH 16				MONTH 17				MONTH 18				MONTH 19				MONTH 20																			
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JAN 20				FEB 20				MAR 20				APR 20				MAY 20				JUN 20				JUL 20				AUG 20				SEP 20				OCT 20				NOV 20				DEC 20				JAN 21				FEB 21				MAR 21				APR 21				MAY 21				JUN 21				JUL 21				AUG 21				SEP 21				OCT 21				NOV 21				DEC 21			

Offroad Equipment Emissions - Bajada Solar Project - Mitigated Tier 4

	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	1,608	40,183	9,491	5,348,207	216.5	214.9	50.7	pounds/year
2029	436	9,008	2,590	1,423,023	63.7	62.5	13.5	pounds/year
2030								pounds/year
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	0.80	20.1	4.75	2,426	0.11	0.11	0.03	tons/year
2029	0.22	4.50	1.30	645	0.03	0.03	0.01	tons/year
2030								tons/year
Threshold	25	100	25		70	70	100	
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	6.19	155	36.5		0.83	0.83	0.20	pounds/day, average
2029	1.68	34.6	9.96		0.24	0.24	0.05	pounds/day, average
2030								pounds/day, average
	ROG	CO	NOx	CO2	PM10	PM2.5	SOx	
2028	10.3	263	55.0		1.40	1.39	0.33	pounds/day, maximum
2029	6.77	155	40.0		0.95	0.93	0.22	pounds/day, maximum
2030								pounds/day, maximum
Threshold	75	550	100		150	55	150	

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

HV WORK

MONTH 1				MONTH 2				MONTH 3				MONTH 4				MONTH 5				MONTH 6				MONTH 7				MONTH 8				MONTH 9				MONTH 10				MONTH 11				MONTH 12				MONTH 13				MONTH 14				MONTH 15				MONTH 16				MONTH 17				MONTH 18				MONTH 19				MONTH 20																			
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Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

[illegible]

Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

Report: 30/09/2024 PJ2/2024/000/REV B155										CONSTRUCTION																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
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Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

Report: 30/09/2024 12:20:00 PM 30/09/2024				INDUSTRIAL		MONTH 1										MONTH 2										MONTH 3										MONTH 4										MONTH 5										MONTH 6										MONTH 7										MONTH 8										MONTH 9										MONTH 10										MONTH 11										MONTH 12										MONTH 13										MONTH 14										MONTH 15										MONTH 16										MONTH 17										MONTH 18										MONTH 19										MONTH 20										MONTH 21										MONTH 22										MONTH 23										MONTH 24										MONTH 25										MONTH 26										MONTH 27										MONTH 28										MONTH 29										MONTH 30										MONTH 31										MONTH 32										MONTH 33										MONTH 34										MONTH 35										MONTH 36										MONTH 37										MONTH 38										MONTH 39										MONTH 40										MONTH 41										MONTH 42										MONTH 43										MONTH 44										MONTH 45										MONTH 46										MONTH 47										MONTH 48										MONTH 49										MONTH 50										MONTH 51										MONTH 52										MONTH 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Stage 1 - Mobilization, site prep, fencing, laydown, trenching, site civil

Stage 2 - Cable install, trench backfill, heavy civil, pile install, module install, bess install

Stage 3 - invert

HV WORK

[illegible]

Dust From Material Movement

Grading Equipment Passes

AP-42, 11.9

EF _{PM10} =	1.542546 lb/VMT	Phase	Acres Graded	Grader Passes	Trenching (CY)	Work Days
EF _{PM2.5} =	0.16655879 lb/VMT	Site Preparation and Grading	2600	2	10,000	90

E = EF x VMT
VMT = As / Wb x 43,560 (sf/ac) / 5,280 (ft/mi)

Where:

E =

emissions (lb)

PM₁₀ EF =

1.542546 emission factor (lb/VMT)

PM_{2.5} EF =

0.16655879 emission factor (lb/VMT)

VMT =

1,788 vehicle miles traveled

As =

2,600 acreage of the grading site (acre)

Wb =

12 blade width of the grading equipment (CalEEMod default is 12 ft based on Caterpillar's 140 motor grader)

Phase	VMT	Pounds		Tons	
		PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}
EF (lb/VMT)		1.542546	0.16655879		
Site Preparation and Grading	1788	61.3	6.62	0.03	0.00
Total		61.3	6.62	0.03	0.00

Trenching

AP-42, 13.2

EF = emission factor (lb/ton)
EF = K*(0.0032)*((U/5)^1.3)/((M/2)^1.4)

K_{PM10} = 0.35 PM₁₀ particle size multiplier (AP-42 default)
K_{PM2.5} = 0.053 PM_{2.5} particle size multiplier (AP-42 default)
U = 2.2 mean wind speed (meters/second) (CalEEMod default is 7.1 mph [2.2 m/s])
M = 12 material moisture content (%) (The moisture contents of different materials are listed in AP-42 Table 13.2.4-1. CalEEMod uses the moisture content of cover (12%) as default).

EF_{PM10} = 3.13541E-05
EF_{PM2.5} = 4.74791E-06

Phase	Tons	Pounds		Tons	
		PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}
EF (lb/ton)		3.13541E-05	4.74791E-06		
Site Preparation and Grading	12,642	0.00	0.00	0.00	0.00
Total	12,642	0.00	0.00	0.00	0.00

Notes:
Assumes 1.2641662 tons per CY based on a bulk density of 1.5 grams/cubic centimeter (per CalEEMod).

E = EF x TP
EF = emissions factor (lb/ton)
TP = throughput of loaded and unloaded materials (ton)

Grading+Trenching	Pounds		Tons	
	PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}
	61.28	6.62	0.03	0.00

	VOC Tons/Yr	CO Tons/Yr	NOx Tons/Yr	PM10 Tons/Yr	PM2.5 Tons/Yr	CO2 MT/Yr	SOx Tons/yr
Backup Generator - Well Operations	0.02	0.23	0.25	0.01	0.01	42	0.16
Backup Generator - O&M Operations	0.00	0.00	0.00	0.00	0.00	1	0.00
Employees	0.00	0.23	0.01	0.01	0.00	83	
Pickup Trucks	0.00	0.00	0.01	0.00	0.00	29	
Onsite Equipment	0.01	0.01	0.01	0.01	0.01	20	0.01
Annual Total	0.03	0.47	0.28	0.03	0.02	175	0.17
Daily Total	0.21	3.73	2.22	0.22	0.18	1,399	1.36

Worker Vehicle

Equipment Type:
Passenger Cars

Days	Trips /Day	Round Trip Length (mi)	Total Trips	Miles / Day	Total Miles
260	10	120	2,600	1,200	312,000

Pollutants	VOC		CO		NOX		CO2		PM10		PM2.5	
G/Mi	0.01		0.66		0.04		264.56		0.02		0.01	
Units	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	MT/ Day	MT/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr
Worker Vehicle	0.02	0.00	1.74	0.23	0.10	0.01	0.32	83	0.04	0.01	0.01	0.00

On-Road Pickup

Equipment Type:
Passenger Trucks

Days	Trips /Day	Round Trip Length (mi)	Total Trips	Miles / Day	Total Miles
260	2	60	520	120	31,200

Pollutants	VOC		CO		NOX		CO2		PM10		PM2.5	
G/Mi	0.01		0.03		0.27		938.62		0.06		0.02	
Units	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr	MT/ Day	MT/ Yr	Lb/ Day	Tons/ Yr	Lb/ Day	Tons/ Yr
Pickup Truck	0.00	0.00	0.01	0.00	0.07	0.01	0.11	29	0.02	0.00	0.01	0.00

Forklifts and manlifts would be used during routine maintenance activities, estimated to be once per week for 6 hours, or an average of one hour per day.

Weed abatement equipment (chemical or mechanical) would occur approximately twice per year, for 2 to 3 days per occurrence.

Approximately one pickup truck or ATV will be used an average of 4 hours per day.