



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

October 13, 2023

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1201 Bird Center Drive  
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## **Preliminary Review for the Easley Renewable Energy Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the future NEPA/CEQA document. Please send a copy of the NEPA/CEQA document upon its completion and public release directly to South Coast AQMD. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses (electronic versions of all emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files, not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

### **NEPA/CEQA Air Quality Analysis**

Staff recommends that the NEPA Lead Agency comply with the United States Environmental Protection Agency (U.S. EPA) to analyze and compare the air quality emissions to the De Minimis Levels<sup>1</sup> and to provide the General Conformity for NAAQS nonattainment and maintenance areas.<sup>2</sup> The General Conformity is intended to prevent the air quality impacts of the Proposed Project from causing or contributing to new violations of the air quality standards, exacerbating existing violations, or interfering with the purpose of the applicable implementation plans.<sup>3</sup>

Staff recommends that both NEPA and CEQA Lead Agency(s) use South Coast AQMD's CEQA Air Quality Handbook and website<sup>4</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that both Lead Agency(s) use the CalEEMod<sup>5</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

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<sup>1</sup> U.S. EPA. De Minimis Tables. Access at: <https://www.epa.gov/general-conformity/de-minimis-tables>

<sup>2</sup> South Coast AQMD General Conformity. Access at: <http://www.aqmd.gov/home/rules-compliance/ceqa/general-conformity>.

<sup>3</sup> South Coast AQMD General Conformity. Access at: <http://www.aqmd.gov/home/rules-compliance/ceqa/general-conformity>.

<sup>4</sup> South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

<sup>5</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the CEQA Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds<sup>6</sup> and localized significance thresholds (LSTs)<sup>7</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

Both Lead Agency(s) should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., emergency engines and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). The analysis should include air quality impacts from indirect sources, such as sources that generate or attract vehicular trips. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance in CEQA Lead Agency's environmental document.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a CEQA Responsible Agency for the Proposed Project in the CEQA document. The assumptions in the air quality analysis in the CEQA document will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, NEPA<sup>8</sup> and CEQA both require that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,<sup>9</sup> South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,<sup>10</sup> and Southern California Association of Government's Mitigation

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<sup>6</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

<sup>7</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

<sup>8</sup> Per 40 C.F.R. § 1508.20, NEPA mitigation includes avoiding, minimizing, rectifying, reducing over time, or compensating for an impact. 40 C.F.R. § 1502.16(h) requires NEPA document should identify feasible measures for any adverse environmental impacts, even those that are not considered significant.

<sup>9</sup> <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

<sup>10</sup> South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.<sup>11</sup>

South Coast AQMD staff is available to work with the Lead Agency to ensure that the Proposed Project's air quality, greenhouse gas, and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Danica Nguyen, Air Quality Specialist, at [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov).

Sincerely,

*Sam Wang*

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Planning, Rule Development & Implementation

SW:DN

RVC230927-01

Control Number

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<sup>11</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:  
[https://www.connectsoal.org/Documents/PEIR/certified/Exhibit-A\\_ConnectSoCal\\_PEIR.pdf](https://www.connectsoal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf).