



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Draft Environmental Impact Report (EIR) for the IP Easley Renewable Energy Project (Proposed Project)**

The South Coast Air Quality Management District (South Coast AQMD) appreciates the opportunity to review the above-mentioned document. Riverside County is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments.

### South Coast AQMD's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of construction, operation, and decommissioning of a utility-scale solar photovoltaic (PV) electrical generating and storage facility and associated infrastructure.<sup>1</sup> The Proposed Project, located approximately two miles north of Desert Center in Riverside County, California on approximately 3,735 acres of private and Bureau of Land Management-administered land, will generate and deliver renewable electricity to the statewide electricity transmission grid.<sup>2</sup> Specifically, major components of the aforementioned includes the construction of: 1) a solar array field composed of PV panels; 2) power conversion stations; 3) interior collection power lines (underground or overhead); 4) one to two onsite substation yards; 5) one operation and maintenance building; 6) electrical distribution line (underground or overhead) to supply electricity to the Proposed Project site from the existing Southern California Edison distribution system adjacent to the site; 7) telecommunication facilities to allow remote monitoring of facility operation and/or remote control of critical components; 8) meteorological data collection system; 9) a battery energy storage system; 10) approximately 6.7 miles of gen-tie line; and 11) upgrades to another project's substation within its fence line to accommodate interconnection of the Proposed Project's gen-tie line.<sup>3</sup> During operation of the Proposed Project, standby power would be provided by a 61 hp diesel-fueled backup generator.<sup>4</sup> Sensitive receptors in the Lake Tamarisk community are located adjacent to the southwestern-

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<sup>1</sup> Draft EIR. Description of the Proposed Project and Alternatives. Page 2-1.

<sup>2</sup> *Ibid.* Executive Summary. Page ES-3.

<sup>3</sup> *Ibid.* Executive Summary. Page ES-3 through ES-4.

<sup>4</sup> *Ibid.* Appendix J. Air Quality Emissions Report. PDF page 85.

most parcels of the Proposed Project.<sup>5</sup> Construction is anticipated to commence in March 2025, last approximately 20 months, and be completed by November 2026.<sup>6</sup>

### South Coast AQMD Comments

#### *Mobile Source Emissions: Inconsistencies in Truck Trip Lengths and Vehicle Miles Traveled (VMT)*

The Proposed Project's truck trip lengths and VMT used for construction truck emission calculations are inconsistent in multiple locations within the Draft EIR. For instance:

- Page 2-18 of the Draft EIR states, "Materials deliveries during construction would travel up to **150 miles one way** from sources to the Project site." It also states, "an estimated **80 round trips per day** would be required to deliver materials and equipment to the Project site."
- Page 5 of Appendix J states that some material, such as concrete, may be brought over from Blythe by truck (which is approximately a **60-mile one-way trip length**)
- Page 39 of Appendix J has Vendor/Hauling trip counts as **80 one-way trips per day**. 80 round trips per day, however, as mentioned on Page 2-18 of the Draft EIR, equals **160 one-way trips**.
- Page 99 of Appendix J (CalEEMod output files) has Vendor and Hauling Trip Lengths as **60 miles**. Also, the **Vendor Trip Number is stated as 80**.

Thus, the parameters used for the CalEEMod calculations result in an underestimation of the construction truck emissions. Staff recommends: 1) reconciling such inconsistencies in truck trip lengths and VMT; 2) updating the CalEEMod mobile source emission calculations for regional and localized impacts; and 3) including the revised results in the Final EIR.

#### *Air Quality Mitigation Measure for NOx Emissions from Construction*

The air quality analysis in the Draft EIR concludes that the Proposed Project's nitrogen oxides (NOx) regional construction emissions would be less than significant after mitigation, as follows:<sup>7</sup>

- 182.17 lbs/day of NOx before mitigation
- 99.42 lbs/day of NOx after mitigation
- 100 lbs/day = South Coast AQMD's CEQA NOx regional mass daily threshold<sup>8</sup>

Further, the mitigated NOx regional construction emissions are just below the NOx threshold, by approximately 0.58 lbs/day, because the CalEEMod modeling files in Appendix J assumed that all

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<sup>5</sup> Draft EIR. Appendix J. Air Quality Emissions Report. Page 4.

<sup>6</sup> *Ibid.* Appendix J. Air Quality Emissions Report. PDF page 96 through 97.

<sup>7</sup> *Ibid.* Air Quality. Page 3.4-10.

<sup>8</sup> South Coast AQMD CEQA Air Quality Significance Thresholds. Accessed here:

<https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

construction off-road equipment rated greater than 50 hp will be equipped with Tier 4 engines as mitigation without any supporting justification as to how this will be accomplished.<sup>9</sup> As a practical matter, varying inventories of construction equipment make it unlikely that Tier 4 engines will be available on all construction off-road equipment rated greater than 50 hp. Thus, the assumed reliance on all Tier 4 engines for construction off-road equipment greater than 50 hp provides a greater mitigation benefit in the calculations, which overestimated the amount of mitigated NOx emissions than what would be expected to occur on the construction site.

Moreover, the assumed reliance on 100 percent of Tier 4 construction equipment contradicts one of the Proposed Project's air quality mitigation measures, MM AQ-2, which states that, "All construction diesel engines... with a rating at 50 hp or higher shall meet the Tier 4 California Emission Standards for Off-Road Compression-Ignition Engines... unless a good faith effort demonstrates that such engine is not available for a particular item of equipment. In the event that 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 nitrogen oxide... and diesel particulate matter... to no more than Tier 3 levels unless certified by the engine manufactures that the use of such devices is not practical for specific engine types."<sup>10</sup>

Due to the possible use of Tier 3 construction equipment, Staff recommends: 1) consulting one or more construction equipment suppliers and obtaining quotes detailing the availability of the various Tier 4 and Tier 3 construction equipment for the project and revising the CalEEMod calculations for the mitigated regional construction emissions accordingly; and 2) including the revised results in the Final EIR.

#### *South Coast AQMD Air Permits and Role as a Responsible Agency*

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project analysis in its current form in the Draft EIR is inadequate to be relied upon for this purpose.

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<sup>9</sup> Draft EIR. Appendix J. Air Quality Emissions Report. PDF page 88 & 89.

<sup>10</sup> *Ibid.* Air Quality. Page 3.4-17.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <http://www.aqmd.gov/home/permits>.

### Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

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