



South Coast Air Quality Management District

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SENT VIA E-MAIL:

February 25, 2026

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**Initial Study/Mitigated Negative Declaration (IS/MND) for the
Skybridge Eagle Mountain Solar Farm & Green Hydrogen Project
(Proposed Project)
(SCH No: 2026020041)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate 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 have provided a brief summary of the project information and prepared the following comments, which are organized by topic of concern.

Summary of Proposed Project Information in the IS/MND

Based on the IS/MND, the Proposed Project would consist of the construction, operation, maintenance, and eventual decommissioning of a green hydrogen production facility. Key components include:

- Five 10-megawatt (MW) electrolyzers with a total generating capacity of 50 MW, capable of producing up to 7,500 kilograms (kg) of hydrogen per day (kg H₂/day).¹
- A 50-MW solar photovoltaic (PV) facility on approximately 133 acres of private land.²
- Up to 35,000 kg of compressed or liquid hydrogen storage.
- A hydrogen tube trailer facility.
- Two 5,000-square-foot utility/operations buildings with an on-site septic system.
- An on-site groundwater well and water storage tank.³
- A potential future expansion to 500 MW (up to 50 electrolyzers).⁴

The Proposed Project site is located north of Kaiser Road and east of Power Line Road in the Chuckwalla Valley area of Riverside County.⁵ Review of aerial imagery indicates that the nearest sensitive receptor (e.g., existing residence) is located approximately 300 feet from the Proposed Project site boundary. Construction activities would occur in three phases over an estimated nine-month period, with approximately three months in each phase.⁶

¹ IS/MND. p. 1.

² *Ibid.*

³ *Ibid.*

⁴ *Ibid.*

⁵ *Ibid.* p. 2.

⁶ *Ibid.* p. 10.

South Coast AQMD Comments

Inconsistent Project Descriptions in the CEQA Documents

Appendix A - Air Quality, Greenhouse Gas, and Water Usage Impacts Letter Report presents a project description that differs slightly from the description provided in the IS/MND. Under the CEQA, a clear, stable, and accurate project description is essential to ensure that the environmental analysis is legally adequate and that impact conclusions are supported by substantial evidence in the record.

For reference and transparency, Table A below identifies and compares the discrepancies between the project descriptions contained in the CEQA documents. These discrepancies may affect key modeling inputs and assumptions, including but not limited to project size, operational characteristics, construction duration, equipment usage, trip generation, etc. Because such parameters directly inform the criteria pollutant emissions estimates and greenhouse gas (GHG) calculations, it is critical that the environmental analysis be based on a consistent project description.

Table A – Project Descriptions in IS/MND and Appendix A

	IS/MND	Appendix A⁷
Project Components	50 MW solar facility	60 MW facility
Project Size	133 acres	136 acres
Compressed or liquid hydrogen storage at full buildout	35,000 kg	10,000 kg

Therefore, the Lead Agency is recommended to revise both the IS/MND and Appendix A to ensure that the project description is accurate, consistent, and incorporates a unified and definitive project description and confirms that all air quality and GHG analyses are based on that description in the Final MND.

Clarification Regarding the Hydrogen Production per Day

Section 1.1 (Project Components) of the IS/MND states that the electrolyzers are proposed to operate approximately 20 hours per day and generate approximately 22,726 kg H₂/day.⁸ However, the Project Description indicates that the five 10 MW electrolyzers would produce 7,500 kg H₂/day.⁹ If each electrolyzer is capable of producing 7,500 kg H₂/day, total production over a 20-hour operational period would be approximately 31,250 kg H₂/day.

The discrepancy between the stated production capacity (22,726 kg H₂/day) and the implied output based on the electrolyzer specifications is not explained in the IS/MND. Because hydrogen production rates are directly relevant to assessing operational energy demand, criteria pollutants and GHG emissions, and overall air quality impacts under CEQA, the basis for the assumed daily production rate must be clearly documented.

⁷ Appendix A - Air Quality, Greenhouse Gas, and Water Usage Impacts Letter Report. p. 1.

⁸ *Ibid.* p. 6.

⁹ *Ibid.* p. 1.

To ensure transparency and adequacy of the environmental analysis, the Lead Agency is recommended to clarify in the Final MND the methodology, assumptions, and calculations used to derive the 22,726 kg H₂/day production. If the maximum daily hydrogen production capacity exceeds the value analyzed in the IS/MND, the air quality and related impact analyses are recommended to be revised accordingly to reflect a conservative, worst-case operational scenario.

Clarification Regarding Hydrogen Transport

Section 1.1 (Project Components) of the IS/MND states that hydrogen would either be directly injected into the existing SoCalGas natural gas pipeline via a stub pipeline (contingent upon execution of an interconnection agreement with SoCalGas) or loaded into trailers for off-site delivery.¹⁰ The IS/MND further indicates that up to 13 truck trips per day would be required to export hydrogen generated by operation of the 50-MW electrolyzer system.¹¹

As noted in a prior comment, there is uncertainty regarding the total daily hydrogen production capacity. If the actual production rate is higher than analyzed in the IS/MND, the number of truck trips required to transport hydrogen off-site could correspondingly increase. This potential increase in heavy-duty truck traffic may result in higher emissions of criteria pollutants (e.g., fugitive particulate matter emissions) and GHG, as well as increased localized air quality impacts, which must be adequately evaluated under CEQA.

In addition, the IS/MND does not provide sufficient information regarding the specifications of the transport trailers or trucks, including hauling capacity (e.g., kilograms of hydrogen per trailer), or anticipated trip lengths. Without this information, it is not possible to verify the basis for the stated maximum of 13 truck trips per day or to confirm that the air quality and transportation impact analyses reflect a conservative, worst-case scenario. Therefore, the Lead Agency is recommended to revise to include detailed information regarding hydrogen transportation logistics, including trailer capacity, truck specifications, trip frequency assumptions, and supporting calculations in the Final MND. If revised production rates or transportation assumptions result in increased truck trips, the air quality, GHG, and related impact analyses should be updated accordingly to ensure that the environmental review is supported by substantial evidence.

Potentially Underestimated Emissions Analysis during Construction Phase

Section 1.2.3 of the IS/MND states that flatbed trailers and haul trucks would be used to transport construction equipment and materials to the Proposed Project site.¹² In addition, the IS/MND indicates that construction material deliveries would travel up to 150 miles one way from the source to the Proposed Project site.¹³ However:

- Table 2: Construction Vehicles in the same section does not identify any hauling truck trips associated with construction activities and assumes the default trip length of 20 miles per trip.¹⁴

¹⁰ *Ibid.* p. 7.

¹¹ *Ibid.*

¹² *Ibid.* p. 13.

¹³ *Ibid.* p. 13.

¹⁴ *Ibid.* p. 14.

- The California Emissions Estimator Model (CalEEMod) output files included in Appendix A indicate zero hauling truck trips with a default 20 miles of trip length in the regional construction emissions modeling.¹⁵

The environmental analysis needs to be supported by substantial evidence and based on an accurate and stable project description. Construction-related hauling trips typically generate criteria air pollutant emissions and GHG emissions from on-road heavy-duty diesel vehicles. If hauling trips are not quantified and incorporated into the emissions inventory, the regional construction emissions analysis may underestimate total project-related emissions. This could affect the determination of significance under applicable air district thresholds and the adequacy of the disclosure in the IS/MND. Therefore, the Lead Agency is recommended to revise the IS/MND and its supporting technical documentation (Appendix A and the CalEEMod modeling files) to include the appropriate number of hauling truck trips required to deliver construction equipment and materials to the Proposed Project site. The updated modeling assumptions include trip lengths, daily trip rates, haul routes, construction schedules, and vehicle classifications. need to be clearly documented, and the recalculated regional construction emissions with the updated impact determination should be included in the Final MND.

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, storage tanks, etc., one or more air permits from South Coast AQMD will be required. The Final MND should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,¹⁶ Rule 203 – Permit to Operate,¹⁷ Rule 401 – Visible Emissions,¹⁸ Rule 402 – Nuisance,¹⁹ Rule 403 – Fugitive Dust,²⁰ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,²¹ Rule 1113 – Architectural Coating, Regulation XIII – New Source Review,²² Rule 1401 – New Source Review of Toxic Air Contaminants,²³ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,²⁴ etc. It is important to note that when air permits from the South Coast AQMD are required, the role of the 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, it

¹⁵ Appendix A. CalEEMod Output File. PDF p. 73-74.

¹⁶ South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

¹⁷ South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹⁸ South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

¹⁹ South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

²⁰ South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

²¹ South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

²² South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

²³ South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

²⁴ South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

is important to note that 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 description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

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 <https://www.aqmd.gov/home/permits>.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

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SW:DN

RVC260211-06

Control Number