



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Supplemental Environmental Impact Report (SEIR) for the
Grace Solar Energy Center Project (Proposed Project) (SCH No:
2025010194)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The County of Riverside 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 Draft SEIR

Based on the Draft SEIR, the project consists of constructing: 1) a 500 megawatt (MW) solar photovoltaic facility and a 500 MW battery energy storage system on 3,705 acres with 3.5 miles of transmission lines during Phase 1; and 2) 10.5 miles of transmission lines (with 8.6 miles occurring within existing right-of-way during Phase 2). Construction is expected to take 28 months with operation starting as early as 2027. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 275 feet north of the project site. The Proposed Project is located approximately two miles north of Interstate 10, adjacent to the west side of the Blythe city limits in Blythe.

Although the Proposed Project is located within the jurisdiction of the Antelope Valley Air Quality Management District (AVAQMD), operation of this large-scale project has the potential to generate a high volume of heavy-duty truck traffic, including diesel heavy-duty trucks (HHDTs) and transportation refrigeration units (TRUs) that would travel beyond the AVAQMD boundary into other air districts, including but not limited to the South Coast AQMD region, particularly to and from the Ports of Los Angeles and Long Beach.

South Coast AQMD Comments

Inconsistencies in Construction Emissions and Incomplete Air Quality Analysis

The Air Quality Impact Analysis relies on the California Emissions Estimator Model (CalEEMod) to quantify construction emissions; however, there are inconsistencies between the CalEEMod output files provided in Appendix G and the emissions presented in the Draft SEIR. Specifically, Table 7 (Estimated Construction Criteria Air Pollutant Emissions – Unmitigated) does not align with the CalEEMod modeling results. For example, the CalEEMod output file

shows nitrogen oxides (NOx) emissions for the year 2026 as approximately 167 pounds per day, whereas Table 7 reports NOx emissions as 131.11 pounds per day. Similar discrepancies appear to exist for other criteria pollutants as well. These differences raise concerns regarding the accuracy and transparency of the emissions analysis.

Because CalEEMod is the basis for determining project impacts and the need for mitigation, it is important that the emissions presented in the Draft SEIR are consistent with the modeling outputs or that any adjustments are clearly explained and documented. Therefore, it is recommended that the Air Quality Impact Analysis be revised to reconcile these discrepancies, include a clear breakdown of on-site versus off-site emissions, present localized emissions, and ensure consistency with the CalEEMod output files in Appendix G.

Completion of CEQA Air Quality Impacts Analysis During Operation Activities

Based on the Draft SEIR, the Lead Agency has not provided any analysis for emissions for localized significant thresholds (LSTs) for operation. The Lead Agency has stated that the Draft SEIR does not contain analysis on LSTs for operational, citing the absence of project-level data for the Proposed Project. Pursuant to CEQA guidelines section 15064 (Determining the Significance of the Environmental Effects Caused by a project) the Lead Agency is responsible for performing an in-depth and detailed analysis of an estimation of the potential localized and regional air quality impact analysis. This analysis will provide us with a preliminary assessment of the potential air quality impacts, both at the regional and localized levels, arising from the Proposed Project.

Overlapping Construction and Operational Activities

Even though the Proposed Project consists of approximately a total of 3,705 acres of land over the course of a two-year construction period, the Draft SEIR does not analyze the scenario of overlapping between construction and operational activities. In addition, the project is proposed to be developed in four phases, and the Draft SEIR does not evaluate the potential for overlapping construction activities between these phases, which could result in higher combined emissions. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to consider both the overlap of construction phases and the overlap between construction and operational activities. The estimated overlapped emissions should then be compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine their level of significance, which should be included in the Final SEIR. If the overlapped emissions analysis is not included in the Final SEIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

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 SEIR. 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 SEIR. In addition, as provide explaining 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 are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

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SW:SG

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