



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

April 18, 2019

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## **Draft Environmental Impact Report (DEIR) for the Proposed IP Athos Renewable Energy Project (SCH No. 2018051021)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

### South Coast AQMD Staff's Summary of Project Description

The Lead Agency is proposing construction of seven non-contiguous groups of solar-photovoltaic (PV) electrical generating panels, a 500-megawatt electrical storage facility, and an 11-mile 220 kilovolt (kV) generation tie (gen-tie) transmission line interconnecting to the Southern California Edison (SCE) Red Bluff Substation on 3,400 acres (Proposed Project). The Proposed Project is located near the northeast corner of Interstate 10 and Rice Road in the community of Desert Center. Construction of the Proposed Project is expected to occur over 30 months<sup>1</sup>.

### South Coast AQMD Staff's Summary of Air Quality Analysis and Health Risk Assessment

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational air quality emissions and compared those emissions to South Coast AQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project would result in less than significant regional and localized air quality impacts for criteria pollutants during construction, after the implementation of mitigation measures (MM) AQ-1 through AQ-4. MM AQ-1 requires a fugitive dust control plan to be submitted for review and approval to South Coast AQMD. MM AQ-2 requires on-site construction equipment to meet or exceed the United States Environmental Protection Agency's (U.S. EPA) Tier 4 emissions standards for off-road construction equipment. MM AQ-3 requires the use of 2010 or newer on-road vendor and hauling trucks that meet or exceed U.S. EPA 2010 emissions standards for on-road heavy duty trucks. MM AQ-4 requires a Construction Activity Management Plan to be submitted to the Lead Agency for review and approval to include the dust control practices, construction equipment fleet, and on-road truck fleet incorporated in MM AQ-1 through MM AQ-3. MM AQ-4 also extends the duration of construction from 30 months to four calendar years and limits the amount of daily construction activities to ensure that daily emissions are below South Coast AQMD's regional and localized air quality CEQA significance thresholds.

The Lead Agency also prepared a construction HRA and found that the Proposed Project's construction activities would result in an unmitigated cancer risk of 5 in one million at the maximum impacted sensitive receptor, which is below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk<sup>2</sup>.

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<sup>1</sup> DEIR, Section 2.3, *Construction Activities*, Page 2-13.

<sup>2</sup> South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

South Coast AQMD Staff's Comments

Upon a review of the DEIR, South Coast AQMD staff found that chemical soil stabilizers would likely be used during construction as a dust control practice. Some chemical soil stabilizers contain volatile organic compounds (VOCs) and may result in odors that will need to be controlled. Odor management methods include, but are not limited to, utilizing odor neutralizers<sup>3</sup> or other additives, which may contain VOCs and toxic compounds. If using chemical soil stabilizers and odor neutralizing products containing VOCs is reasonably foreseeable for the Proposed Project, and to facilitate a good-faith effort at full disclosure during the CEQA process (CEQA Guidelines Section 15003(i)), South Coast AQMD staff recommends that the Lead Agency calculate the emissions and include them in the Proposed Project's construction emissions in the Final EIR. Questions on odor management methods or other SCAQMD rules and regulations can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The Lead Agency found that construction activities of the Proposed Project would result in less than significant air quality impacts by comparing construction emissions during winter months to South Coast AQMD's regional and localized air quality CEQA significance thresholds. However, CalEEMod utilizes emission factors that are specific to summer and winter months, with summer months resulting in slightly more NOx emissions than winter months. Therefore, South Coast AQMD staff recommends that the Lead Agency calculate emissions in CalEEMod during summer months and compare them to South Coast AQMD's regional and localized air quality CEQA significance thresholds to determine the level of significance for construction in the Final EIR.

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at [RDalbeck@aqmd.gov](mailto:RDalbeck@aqmd.gov), or (909) 396-2139 if you have any questions regarding the comments.

Sincerely,



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Control Number

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<sup>3</sup> The odor neutralizing products used in the odor misting system should have no adverse environmental impacts. The formulations should be free of toxic compounds, VOC, and fragrance. Many products available in the market attempt to mask odors with fragrances, which can also result in odor complaints.