



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 Proposed Sapphire Solar Project (Proposed Project) (SCH No.: 2023050303)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on 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 (Staff) has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

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

Based on the Draft EIR, the Proposed Project consists of constructing, operating, maintaining, and decommissioning a utility-scale solar photovoltaic (PV) electrical generating and storage facility to generate and deliver electricity to the statewide electricity transmission grid.¹ The Proposed Project is approximately 1,123 acres, with approximately 1,082 acres on private lands and approximately 41 acres on land administered by the U.S. Department of Interior, Bureau of Land Management (BLM), Palm Springs-South Coast Field Office.² The Proposed Project would include up to 117 megawatts (MW) of PV solar generation and up to 117 MW of battery storage.³ In addition, the Proposed Project would include two Linear Facility Routes (LFRs) that would be located on lands administered by the BLM.⁴ The Proposed Project would also interconnect with the Southern California Edison 230-kV Red Buff substation via line tap on the existing Desert Harvest Solar Project (DHSP) gen-tie line located on lands administered by BLM.⁵ The Proposed Project is anticipated to occur after 39 years or more of operation for the future decommissioning.⁶ The construction would take approximately 12 to 18 months.⁷

¹ Draft EIR. Page 2-2.

² *Ibid.*

³ *Ibid.*

⁴ *Ibid.*

⁵ *Ibid.*

⁶ *Ibid.*

⁷ *Ibid.* Page 2-14.

South Coast AQMD Staff's Comments on the Draft EIR*South Coast AQMD Air Permits and Role as a Responsible Agency*

Based on the Draft EIR, the Proposed Project would include the use of up to three emergency backup generators for Generac SG250 with 250-kW capacity.⁸ Thus, air permits from South Coast AQMD will be required, and 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 evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also 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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:DN

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Control Number

⁸ *Ibid.* Page 3.4-21.