Reading file

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

April 5, 2007

Greg Hill
Bureau of Land Management
Palm Springs-South Coast Field Office
P.O. Box 581260
North Palm Springs, CA 92258

Subject: Mountain View IV Wind Energy Project Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR), Palm Springs, California [CEQ #20070061]

Dear Mr. Hill:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations (40 CFR Parts 1500-1508), and our NEPA review authority Section 309 of the Clean Air Act (CAA).

The DEIS assess alternatives for a proposed wind energy generation project that would be located on public and private lands in the Coachella Valley, within the incorporated limits of the City of Palm Springs, California. The Mountain View IV project would consist of either 58 Gamesa G52 or 49 MHI 1000 wind turbine generators, with a total electrical capacity of approximately 49 megawatts (MW). Additional facilities would include pad-mounted electric transformers, ancillary facilities, gravel roads, overhead and underground connection lines, and an electrical substation. The proposed project will replace an abandoned wind energy project built in the mid 1980's and subsequently removed.

EPA supports increasing the development of renewable energy resources, as recommended in the National Energy Policy. Based on our review, we have no objections to the proposed project. Accordingly, we have rated the DEIS as Lack of Objections (LO) (see enclosed "Summary of EPA Rating Definitions"). To minimize air quality impacts during construction, we recommend incorporating additional mitigation measures, as described in our detailed comments (attached).

We appreciate the opportunity to review this Draft EIS and request a copy of the Final EIS when it is officially filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3846, or have your staff contact Ann McPherson at (415) 972-3545 or mcpherson.ann@epa.gov.

Sincerely,

Nova Blazej, Manager
Environmental Review Office

Enclosures: Summary of Rating Definitions
EPA Detailed Comments

EPA DETAILED COMMENTS ON THE MOUNTAIN VIEW IV WIND ENERGY PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT (DEIS/EIR), PALM SPRINGS, CALIFORNIA, APRIL 5, 2007

Air Quality Impacts

The proposed project is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) implements local air quality regulations in the SCAB to carry out Federal Clean Air Act (CAA) requirements, as authorized by the U.S. Environmental Protection Agency (EPA). The current SCAB nonattainment designations under the Federal CAA are as follows: carbon monoxide - serious nonattainment; 8-hour ozone - severe nonattainment; particulate matter with a diameter of 10 microns or less (PM_{10}) - serious nonattainment; and particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$) - nonattainment. The SCAB has the worst 8-hour ozone and $PM_{2.5}$ problems in the nation; attainment of these National Ambient Air Quality Standards (NAAQS) will require massive reductions from mobile sources, given the rapid growth in this emissions category and the long lifespan of diesel engines.

The DEIS does not include an evaluation of existing air quality within the geographic scope of the project and does not examine the potential impacts to air quality from the project. Such an evaluation is necessary to assure compliance with State and Federal air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality.

The DEIS states that the project is not expected to significantly affect air quality as defined by the Air Quality Element of the City's General Plan and is not expected to exceed threshold criteria of the South Coast Air Quality Management District Air Quality Handbook (pg. 4.0-2); however, additional information is not provided. The eastern desert areas of Riverside County are generally non-attainment areas with regard to PM_{10} (pg. 4.0-2). The DEIS acknowledges that the project will create some dust and blowsand during construction and maintenance activities and refers to a Dust Control Plan; however, this Dust Control Plan is not referenced within the document.

Recommendation:
The Final Environmental Impact Statement (FEIS) should include a discussion of existing air quality within the geographic scope of the project. The FEIS should describe and estimate air emissions from potential construction and other activities, as well as proposed mitigation measures to minimize those emissions. The FEIS should reference or include the Dust Control Plan within the appendices of the document.

Construction Mitigation Measures

EPA supports the construction mitigation measures identified in the DEIS: management practices which minimize dust and blowsand to the greatest extent possible;

the use of gravel base to reduce silt content of roadbeds and turbine sites; a 15 or 20 mph vehicle speed limit; and regular watering of roadbeds/graded areas during construction (pgs. 2.0-19; 4.0-2). In addition, due to the serious nature of the PM_{10} and $PM_{2.5}$ conditions in the SCAB, we recommend that the best available control measures for these pollutants be implemented at all times. EPA recommends including a Construction Emissions Mitigation Plan (CEMP) for fugitive dust and diesel particulate matter (DPM) in the FEIS.

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Reduce use, trips, and unnecessary idling from heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- Prohibit any tampering with engines and require continuing adherence to manufacturers recommendations
- Require that leased equipment be 1996 model or newer unless cost exceeds 110 percent or average lease cost. Require 75 percent or more of total horsepower of owned equipment to be used be 1996 or newer models.
- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.

Administrative controls:

- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or

power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)

- Utilize cleanest available fuel engines in construction equipment and identify opportunities for electrification. Use low sulfur fuel (diesel with 15 parts per million or less) in engines where alternative fuels such as biodiesel and natural gas are not possible.
- Develop a construction, traffic and parking management plan that minimizes traffic interference and maintains traffic flow.