



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT
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May 31, 2022

Via Electronic Mail

Kimberly Cooke
Senior Planner
Town of Mammoth Lakes
437 Old Mammoth Road
Mammoth Lakes, CA 93546

Subject: Comments on Limelight Hotel California Environmental Quality Act Review

Dear Kim,

The Great Basin Unified Air Pollution Control District (District) is a California regional government agency that enforces federal, state, and local air quality regulations in Alpine, Mono and Inyo counties. The District is responsible for permitting sources of air pollution including geothermal development projects. The District has reviewed the May 3, 2022, Limelight Hotel California Environmental Quality Act (CEQA) Addendum to the North Village Specific Plan Environment Impact Report. After an initial review, the District finds that the addendum does not adequately describe the potential air quality impacts or permitting requirements regarding the geothermal component of the Limelight project. The District has provided specific comments below.

Project Description

The project description provided in the addendum does not provide an adequate level of detail regarding the specifics of the geothermal component of the project. Information that should be provided includes, details about the scope, methods and layout of any potential direct geothermal heating system, details regarding the size of any potential geothermal power plant, the type of plant that would be constructed (ex. binary plant using motive fluid or one powered by steam), and details of the power plant design, construction, and operation.

Required Permits and Applicable Rules

District permits are required for geothermal wells and for the geothermal power plant project and are not currently listed or addressed in the addendum. A District secondary source permit is required for the construction of the hotel as well. Additionally, construction projects and geothermal operations are subject to District Rules and Regulations including but not limited to District Rule 401 – Fugitive Dust and Rule 404A–Particulate Matter, and Rule 424 – Geothermal Emissions Standards. District rules are available at <https://gbuapcd.org/rules>.

Air Quality Impacts

The addendum and the previous EIR do not adequately describe or quantify the nature or amount of air pollution emissions associated with the geothermal well drilling, construction of the geothermal project, or any emissions associated with ongoing operations. The addendum states, on page 20, that the construction emissions for the geothermal system are temporary and small in magnitude compared to the future buildout without providing any quantitative data supporting this assertion. Geothermal well drilling involves substantial use of heavy equipment, including large diesel engines. The construction activities may be short term, but the emissions may be substantial and should be quantified and evaluated, especially given the proximity of the project to many residences. The addendum also should describe the potential impacts of H₂S emissions during well drilling and any plan to monitor and abate these impacts. Lastly, the addendum does not discuss any air quality emissions that may or may not be associated with long term operations of the geothermal development.

The addendum states, on page 20, that the project would not exceed the District significance thresholds for criteria pollutant emissions during the project operations. The District has not developed specific air quality significance thresholds and any environmental review document should correctly identify and describe any utilized thresholds.

The District hopes these comments provide clarification regarding the required air district permitting, applicable air quality regulations, and the information that needs to be provided in an updated or subsequent environmental review for a geothermal development project. Please do not hesitate to contact the District for additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Logan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ann Logan
Deputy Air Pollution Control Officer