



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Power Plant 1 and Power Plant 2 Transmission Line Conversion Project (SCH No.: 2018011039)

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 proposes to demolish existing 115-kilovolt (kV) transmission lines, and construct new 230-kV double circuit transmission lines and associated transmission structures along a 12-mile alignment (Proposed Project). The Proposed Project is located on the northeast corner of Interstate 5 and Interstate 210 within the City of Santa Clarita and the community of Granada Hills-Knollwood in the City of Los Angeles. Construction of the Proposed Project will begin in 2019 and will be completed by 2023¹. The closest sensitive receptors along the Project alignment will be within 35 feet of the work area².

South Coast AQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be significant for NOx emissions at 407 pounds/per day (lbs/day)³. After the incorporation of Mitigation Measure (MM) MM-AQ-1, NOx emissions would remain significant and unavoidable⁴, and cumulatively considerable⁵, at 360 lbs/day⁶. MM-AQ-1 requires that off-road construction equipment greater than 75 horsepower (hp) meet Tier 3 emission standards and, when feasible, off-road construction equipment that meets Tier 4 emission standards shall be considered⁷. The Lead Agency also found that localized construction air quality impacts from PM10 at 5.10 lbs/day and PM2.5 at 3.46 lbs/day would be slightly below South Coast AQMD's localized air quality CEQA significance thresholds for PM10 and PM2.5 at 6 lbs/day and 4 lbs/day, respectively. Operational emissions are not expected to change from current baseline operations⁸.

¹ Draft EIR. Section 2 Project Description. Page 2-7.

² *Ibid.* Page 3.2-29.

³ *Ibid.* Page 3.2-24.

⁴ *Ibid.* Page 3.2-34.

⁵ *Ibid.* Pages 3.2-25 through 3.2-27.

⁶ *Ibid.* Page 3.2-34.

⁷ *Ibid.* 3.2-28.

⁸ *Ibid.* Page

South Coast AQMD's 2016 Air Quality Management Plan

On March 3, 2017, South Coast AQMD's Governing Board adopted the 2016 AQMP⁹, which was later approved by the California Air Resources Board (CARB) on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

South Coast AQMD Staff's General Comments

As described in the 2016 AQMP, achieving NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. South Coast AQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. The Proposed Project plays an important role in contributing to additional NOx emissions during the five-year construction period. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the existing mitigation measure, MM-AQ-1 to further reduce the Proposed Project's NOx emissions and localized PM10 and PM2.5 emissions during construction. Please see the attachment for more information.

South Coast AQMD Permits and Responsible Agency

It is important to note that generally, operation of portable engines and portable equipment units of 50 horsepower (hp) or greater that emit particulate matter require a permit from South Coast AQMD or registration with the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)¹⁰. The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if operation of construction equipment will require a South Coast AQMD permit or if it will need to be registered under the PERP through CARB¹¹. If a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final EIR. Any assumptions used in the Air Quality Analysis in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact the South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

Conclusion

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. Further, when the Lead Agency makes the finding that the recommended revision to existing MM-AQ-1 is not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

⁹ South Coast AQMD. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

¹⁰ South Coast Air Quality Management District. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

¹¹ *Ibid.*

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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:AM

LAC190507-05

Control Number

ATTACHMENT

Recommended Revisions to existing MM-AQ-1

1. The Proposed Project will result in an unmitigated 407 lbs/day of NOx emissions during construction, of which 120 lbs/day are from off-road construction equipment and 287 lbs/day are from the use of heavy-duty helicopters¹². The Lead Agency has committed to implementing mitigation measure (MM)-AQ-1, which requires that construction equipment rated at 75 horsepower or greater during construction shall meet Tier 3 off-road emission standards. With the implementation of MM-AQ-1, off-road construction equipment NOx emissions are reduced to 73 lbs/day¹³; however, NOx emissions would remain significant and unavoidable for construction at 360 lbs/day¹⁴, with 287 lbs/day of the emissions from the use of heavy-duty helicopters¹⁵. Although the primary source of construction NOx emissions on a peak day would be from the use of heavy-duty helicopters, South Coast AQMD staff recommends that the Lead Agency explore other feasible measures to further reduce the Proposed Project's construction NOx emissions through, for example, the use of Tier 4 construction equipment. This recommendation will facilitate the 2016 AQMP's goal and timeline for attaining NAAQS for ozone and ensure that the lowest emission technologies such as engines that are rated at Tier 4 off-road emissions standards or better will be used at the Proposed Project. South Coast AQMD staff recommends that the Lead Agency include the following revisions to MM-AQ-1 in the Final EIR.

MM-AQ-1

Use of Tier 4 ~~Tier 3~~ Equipment. The Los Angeles Department of Water and Power (LADWP) and/or its construction Contractor shall comply with the following measures during construction:

- Prior to the start of construction activities, LADWP shall ensure that all 50 ~~75~~ horsepower or greater diesel powered equipment are powered with CARB certified Tier 4 ~~Tier 3~~ engines, except where LADWP establishes that Tier 4 ~~Tier 3~~ equipment is not available supported by substantial evidence such as data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. When feasible, zero-emission or near-zero emission or other alternatively fueled construction equipment ~~Tier 4~~ equipment shall be considered.
- In cases where LADWP is unable to secure a piece of equipment that meets the Tier 4 ~~Tier 3~~ requirement, LADWP may upgrade another piece of equipment to compensate (i.e., a piece of Tier 4 ~~Tier 3~~ equipment would be replaced by zero-emission or near-zero emission or alternatively fueled construction equipment ~~a Tier 4~~ piece). Alternative applicable strategies may include, but would not be limited to, Tier 3 equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily helicopter trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.
- Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans. The Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors

¹² Draft EIR. Appendix C: *Air Quality and Greenhouse Gas Emissions Data*. "Total Air Quality Emissions". Page 2.

¹³ *Ibid.*

¹⁴ Draft EIR. Section 3.2 Air Quality. Page 3.2-34.

¹⁵ *Ibid.*

to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.