



## South Coast Air Quality Management District

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March 2, 2012

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Environmental Project Manager

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### **Draft Environmental Impact Report (Draft EIR) for the Proposed Lakeview Substation Project**

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

In the project description, the lead agency proposes the construction including a new 56 megavolt (MVA) sub-station on an approximately 5.4 acre site; the installation of new sub-transmission source lines; poles to carry these lines; and the construction of new access roads that will require excavation and aggregate base import. The proposed project would also require approximately 20.6 acres of new right-of-way. Construction is anticipated to be completed in approximately 12 months. Since the lead agency has determined that regional construction air quality impacts will exceed the AQMD recommended daily significance thresholds for NO<sub>x</sub> and PM<sub>10</sub>, the AQMD staff recommends that all feasible mitigation measures be considered in the Final EIR. Additional details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Mr. Michael Rosauer,  
Environmental Project Manager

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Sincerely,

A handwritten signature in black ink, appearing to read "Ian V. MacMillan". The signature is written in a cursive, flowing style.

Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:GM  
Attachment

RVC120113-01  
Control Number

### **Construction Mitigation Measures**

1. In its air quality analysis, the lead agency has determined that construction emission impacts would exceed the SCAQMD recommended daily significance thresholds for both PM10 and NOx. In order to minimize significant impacts from PM10 emissions, the lead agency included Mitigation measure 4.3-1b on page 4.3-17, which refers to measures found Table 4.3-3 (SCAQMD Fugitive Dust Best Available Control Measures (BACMs) for All Construction Activity Sources). From that measure, the lead agency states, in part, that “SCE shall develop a Fugitive Dust Control Plan that specifically describes how compliance with each of SCAQMD Rule 403 BACMs shall be achieved.” Although the lead agency intends to identify specific measures at a later date, the lead agency is reminded that complying with a rule, regulation, law, etc., in itself should not be considered mitigation if it is required. The AQMD staff would further recommend that the lead agency commit to specific measures from the table now based on the information at hand, include those specific measures in the project description, and incorporate those measures in the project specific impact calculations in the Final EIR.
2. Based on the lead agency’s determination that project construction emissions will exceed the recommended thresholds for NOx and PM10, the AQMD staff recommends the following mitigation measures to further reduce construction NOx and PM10 impacts in addition to Mitigation Measures 4.3-1a and 4.3-1b listed in the Draft EIR, if applicable and feasible:

#### **Recommended Additions - NOx**

- Prohibit truck idling in excess of five minutes, on- and off-site;
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1; and
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

#### **Recommended Additions – PM10**

- Limit soil disturbance to the amounts analyzed in the air quality analysis;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
  - Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
  - Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
  - Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
  - Replace ground cover in disturbed areas as quickly as possible;
  - Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
  - Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water); and
  - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
3. Further, other lead agencies in the region including LA County Metro, the Port of Los Angeles, and the Port of Long Beach have also enacted the following mitigation measures. AQMD staff recommends the following measures to further reduce air quality impacts from construction equipment exhaust:
- ✓ Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

Mr. Michael Rosauer,  
Environmental Project Manager

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For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)