Comment Letter O1

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

July 1, 2009

Jensen Uchida
San Joaquin Cross Valley Loop Project
c/o Environmental Service Associates
225 Bush Street, Suite 1700
San Francisco, CA 94104

Project: San Joaquin Cross Valley Loop Transmission Project

District Reference No: 20080526

Dear Mr. Uchida:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the subject project, consisting of replacing transmission lines, constructing an 18.5 mile long double circuit transmission line; installation of supporting structures; removal of wave traps, tuners, and installation of additional protective relays at Rector, Springville, Vestal, and Big Creek 3 Substations; and offers the following comments:

A. Construction Emissions – The EIR concludes that construction emissions will have a potentially significant impact on air quality but with mitigation these impacts from construction exhaust would be reduced to a less than significant impact. In order to conclude that the construction exhaust emissions would be less than significant, mitigation measures reducing construction exhaust emissions must be fully enforceable through permit conditions, agreements, or other legally binding instruments (CEQA Guidelines §15126.4, subd.(a)(2)). Feasible mitigation of construction exhaust emission includes use of construction equipment powered by engines meeting, at a minimum, Tier II emission standards, as set forth in §2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 Code of Federal Regulations. The District recommends incorporating, as a condition of project approval, a requirement that off-road construction equipment used on site achieve fleet average emissions equal to or less than the Tier II emissions standard of 4.8 NOx g/hp-hr. This can be achieved through any combination of uncontrolled engines and engines complying with Tier II and above engine standards.

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Executive Director/Air Pollution Control Officer

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B. Table 4.3-4 in the DEIR presents a quantification of uncontrolled emissions that may be generated from the construction activities associated with this project. PM10 exhaust can be mitigated using a construction fleet that is equal to or less than Tier II emissions standards. Conversely, fugitive dust emissions can be mitigated using the measures detailed in mitigation measure 4.3-1b. For clarity, the District recommends the PM10 column be separated into two columns with separate total emissions values, one for fugitive dust emissions and the other for PM10 exhaust.

C. The District uses an applied threshold of 15 tons per year to determine significance of PM10 emissions from fugitive dust. While most projects are not required to quantify fugitive dust emissions, large projects like this one may require quantification (GAMAQI Pg. 64, sect. 6.5.1, p. 3). The District recommends the emissions and mitigation measures be quantified to determine whether fugitive dust emissions will be less than significant after mitigation measures have been applied.

If you have any questions or require further information, please call Kanya Ellington, M.S., at (559) 230-5934.

Sincerely,

Dave Warner
Director of Permit Services

for Arnaud Marjollet
Permit Services Manager

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