B.3.3 Air Quality

AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

B.3.3.1 Setting

Criteria Pollutants. Air quality is determined by measuring ambient concentrations of criteria pollutants. ~~Air~~ Criteria pollutants are those pollutants for which acceptable levels of exposure can be determined and for which standards have been set. The degree of air quality degradation is then compared to the current National and California Ambient Air Quality Standards (NAAQS and CAAQS). Unique meteorological conditions in California and differences of opinion by medical panels established by the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (USEPA) cause considerable diversity between State and federal standards currently in effect in California. In general, the CAAQS are more stringent than the corresponding NAAQS. The standards currently in effect in California are shown in Table B.3.3-1.

Table B.3.3-1. National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards
Ozone	1-hour 8-hour	0.09 ppm 0.070 ppm	— 0.075 ppm
Respirable Particulate Matter (PM10)	24-hour Annual Mean	50 µg/m^3 20 µg/m^3	150 µg/m^3 —
Fine Particulate Matter (PM2.5)	24-hour Annual Mean	— 12 µg/m^3	35 µg/m^3 15 µg/m^3
Carbon Monoxide (CO)	1-hour 8-hour	20 ppm 9.0 ppm	35 ppm 9.0 ppm
Nitrogen Dioxide (NO_2)	1-hour Annual Mean	0.18 ppm 0.030 ppm	0.100 ppm 0.053 ppm
Sulfur Dioxide (SO_2)	1-hour 3-hour 24-hour	0.25 ppm — 0.04ppm—	0.075 ppm 0.5ppm —

Notes: ppm=parts per million; µg/m3= micrograms per cubic meter; "—" =no standard
Source: CARB, 2011a.

Attainment Status and Air Quality Plans. The USEPA, CARB, and the local air district classify an area as attainment, unclassified, or nonattainment. The classification depends on whether the monitored ambient air quality data show compliance, insufficient data available, or non-compliance with the ambient air quality standards, respectively. The proposed Downs Substation would be located in the Indian Wells Valley (northeastern Kern County), within the Mojave Desert Air Basin (MDAB) under the jurisdiction of the Eastern Kern Air Pollution Control District (EKAPCD). The proposed project also includes the replacement of six 115-kV subtransmission line poles along the Inyokern-McGen-Searles No. 1 115-kV substrans-mission line near the community of Trona in northwestern San Bernardino County under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). Additionally, the stringing of fiber optic telecommunication cable along both the Inyokern-McGen-Searles No. 1 and No. 2 115-kV subtransmission lines would be located in the city of Ridgecrest, and the unincorporated communities of Inyokern, Argus, and Trona. Table B.3.3-2 summarizes the federal and State criteria pollutant attainment status for the Indian Wells Valley and northwestern San Bernardino County areas of the MDAB.

Table B.3.3-2. Attainment Status for the Project Areas

Pollutant	Area	Federal Designation	State Designation
Ozone (1-hour)	Indian Wells Valley	N/A	Moderate Nonattainment
	NW SB County	N/A	Moderate Nonattainment
Ozone (8-hour)	Indian Wells Valley	Attainment/Unclassified	Nonattainment
	NW SB County	Attainment/Unclassified	Nonattainment
PM10	Indian Wells Valley	Attainment (Maintenance)	Nonattainment
	NW SB County	Nonattainment	Nonattainment
PM2.5	Indian Wells Valley	Attainment/Unclassified	Unclassified
	NW SB County	Attainment/Unclassified	Unclassified
CO	Indian Wells Valley	Attainment/Unclassified	Unclassified
	NW SB County	Attainment/Unclassified	Attainment
NO_2	Indian Wells Valley	Attainment/Unclassified	Attainment
	NW SB County	Attainment/Unclassified	Attainment
SO_2	Indian Wells Valley	Unclassified	Attainment
	NW SB County	Unclassified	Attainment

Source: CARB, 2011b; USEPA, 2011.

EKAPCD and MDAQMD have developed the following plans to achieve attainment of ozone and PM10 standards. Analysis on the applicability and plan conformance is presented in Section B.3.3.2(a). below.

EKAPCD

- PM10 Maintenance Plan for the Indian Wells Valley
- Ozone Maintenance Plan
- EKAPCD California Clean Air Act Ozone Air Quality Attainment

MDAQMD

- Mojave Desert Planning Area Federal Particulate Matter Attainment Plan (PMAP)
- MDAQMD Ozone Attainment Plan 2004 (State and Federal)
- 8-Hour Ozone Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis)

Valley Fever. Coccidioidomycosis (CM), often referred to as San Joaquin Valley Fever or Valley Fever, is one of the most studied and oldest known fungal infections. Valley Fever most commonly affects people who live in hot dry areas with alkaline soil and varies with the season. This disease, which affects both humans and animals, is caused by inhalation of arthroconidia (spores) of the fungus Coccidioides immitis (CI). CI spores are found in the top few inches of soil and the existence of the fungus in most soil areas is temporary. The cocci fungus lives as a saprophyte in dry, alkaline soil. When weather and moisture conditions are favorable, the fungus "blooms" and forms many tiny spores that lie dormant in the soil until they are stirred up by wind, vehicles, excavation, or other ground-moving activities and become airborne. Agricultural workers, construction workers, and other people who work outdoors and who are exposed to wind and dust are more likely to contract Valley Fever. Children and adults whose hobbies or sports activities expose them to wind and dust are also more likely to contract Valley Fever.

Applicable Regulations

State

California Air Resource Board. Emissions from mobile and portable sources and temporary activities (like construction) are managed through a range of State and federal programs identified below.

- **USEPA/CARB Off-Road Mobile Sources Emission Reduction Program.** The California Clean Air Act mandates that CARB achieve the maximum degree of emission reductions from all off-road mobile sources in order to attain the State ambient air quality standards. Off-road mobile sources include construction equipment. Tier 1 standards for large compression-ignition engines used in off-road mobile sources went into effect in California in 1996. These standards and ongoing rulemaking jointly address emissions of nitrogen oxides (NOx) and toxic particulate matter from diesel combustion. CARB is also developing a control measure to reduce diesel particulate matter emissions as well as NOx from in-use (existing) off-road diesel equipment throughout the State.
- **CARB Portable Equipment Registration Program.** This program allows owners or operators of portable engines and associated equipment commonly used for construction or farming to register their units under a statewide portable program that allows them to operate their equipment throughout California without having to obtain individual permits from local air districts.

Local

- **EKAPCD.** The EKAPCD is responsible for managing and permitting existing, new, and modified sources of air emissions within the Mojave Desert portion of Kern County and also established the following rules and regulations to ensure compliance with local, State, and federal air quality regulations:

  Rule 401. Rule 401 states that a person shall not discharge into the atmosphere, from any single source of emissions whatsoever, any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:

  A. As dark or darker in shade as that designated as No. 1 on the Ringlemann Chart, as published by the U.S. Bureau of Mines, or

  B. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in Subsection A [of the Rules].

  Rule 402. Rule 402 of the EKAPCD's rules and regulations addresses significant man-made dust sources from large operations. A large operation is defined as "any active operation, including vehicle movement on unpaved roadways, on property involving in excess of 100 contiguous acres of disturbed surface area, or any earth-moving activity exceeding a daily volume of 7,700 cubic meters

(10,000 cubic yards) three times during the most recent 365-day period." Rule 402 applies to specified bulk storage, earthmoving, construction and demolition, and man-made conditions resulting in wind erosion, and includes the following requirements:

- A person shall not cause or allow emissions of fugitive dust from any active operation to remain visible in the atmosphere beyond the property line of the emission source, excluding unpaved roadways.
- A person shall utilize one or more Reasonably Available Control Measures to minimize fugitive dust emissions from each source type that is part of any active operation, including unpaved roadways.
- A person shall not cause or allow downwind PM10 ambient concentrations to increase more than 50 micrograms per cubic meter above downwind concentrations as determined by simultaneous upwind and downwind sampling utilizing high-volume particulate matter samplers, or other USEPA-approved equivalent method(s).
- No person shall conduct a large operation without either: (1) conducting on-site PM10 air quality monitoring and associated recordkeeping; or (2) filing for and obtaining an approved fugitive dust emission control plan.

Rule 404.1. Rule 404.1 pertains to particulate matter concentration and states:

- Particulate matter emissions shall not exceed 0.1 grain per standard cubic foot of gas at standard conditions (gr/scf).

Rule 419. Rule 419 states that a person shall not discharge from any source whatsoever such quantities of contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or that endanger the comfort, repose, health, or safety of such persons or the public or that cause or have a natural tendency to cause injury or damage to business or property.

- **Kern County General Plan.** The policies, goals, and implementation measures in the KCGP applicable to air quality as related to the Project are provided below. The KCGP contains additional policies, goals, and implementation measures that are more general in nature and not specific to development such as the proposed project. Therefore, they are not listed below.

  Policies

  - **Policy 18.** The air quality implications of new discretionary land use proposals shall be considered in approval of major developments. Special emphasis will be placed on minimizing air quality degradation in the desert to enable effective military operations.
  - **Policy 19.** In considering discretionary projects for which an EIR must be prepared pursuant to CEQA, the appropriate decision-making body, as part of its deliberations, will ensure that:
    a. All feasible mitigation to reduce significant adverse air quality impacts have been adopted; and
    b. The benefits of the proposed project outweigh any unavoidable significant adverse effects on air quality found to exist after inclusion of all feasible mitigation. This finding shall be made in a statement of overriding considerations and shall be supported by factual evidence to the extent that such a statement is required pursuant to the CEQA.

- **Policy 20.** The County shall include fugitive dust control measures as a requirement for discretionary projects and as required by the adopted rules and regulations of the San Joaquin Valley Unified Air Pollution Control District and the EKAPCD on ministerial permits.
- **Policy 21.** The County shall support air districts' efforts to reduce PM10 and PM2.5 emissions.
- **Policy 23.** The County shall continue to implement the local government control measures in coordination with the Kern Council of Governments and the San Joaquin Valley Unified Air Pollution Control District.

Implementation Measures

- Implementation Measure F. All discretionary permits shall be referred to the appropriate air district for review and comment.
- Implementation Measure G. Discretionary development projects involving the use of tractor-trailer rigs shall incorporate diesel exhaust reduction strategies including, but not limited to:
    a. Minimizing idling time.
    b. Electrical overnight plug-ins.
- Implementation Measure H. Discretionary projects may use one or more of the following to reduce air quality effects:
    a. Pave dirt roads within the development.
    b. Pave outside storage areas.
    c. Provide additional low VOC-producing trees on landscape plans.
    d. Use of alternative fuel fleet vehicles or hybrid vehicles.
    e. Use of emission control devices on diesel equipment.
    f. Provide bicycle lockers and shower facilities on site.
    g. Increasing the amount of landscaping beyond what is required in the Zoning Ordinance (Chapter 19.86).
    h. The use and development of park and ride facilities in outlying areas.
    i. Other strategies that may be recommended by the local air pollution control districts.
- Implementation Measure J. The County should include PM10 control measures as conditions of approval for subdivision maps, site plans, and grading permits.

- **MDAQMD.** The MDAQMD is responsible for managing and permitting existing, new, and modified sources of air emissions within the Mojave Desert and also established the following rules and regulations to ensure compliance with local, State, and federal air quality regulations:

  Rule 403 and 403.2. These rules limit fugitive emissions from certain bulk storage, earthmoving, construction and demolition, and manmade conditions resulting in wind erosion.

  Rule 404. The rule limits particulate matter emissions based on the volume discharge rate.

B.3.3.2 Environmental Impacts and Mitigation Measures

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. The EKAPCD developed a PM10 maintenance plan for the Indian Wells Valley that was approved by the USEPA in 2003 (Federal Register Volume 68, Number 88, pages 24368-24370). The Reasonably Available Control Measures that are part of this approved plan do not impact the construction or operation of the Proposed Project beyond compliance with existing EKAPCD rules and regulations (specifically Rules 401, 404.1, 405). The State of California submitted District Rule 402 – Fugitive Dust to the USEPA on January 13, 2005 as a revision to the California State Implementation Plan (SIP). In 2008, the USEPA found complete CARB's submittal of Rule 402. However, the USEPA has not incorporated Rule 402 into the SIP and the Indian Wells Valley PM10 Maintenance Plan does not rely on Rule 402 as a PM10 control measure.

The EKAPCD adopted a final staff report on September 13, 2007 for the rule development schedule to comply with Senate Bill 656 (Sher) to reduce public exposure to PM10 and PM2.5. Eight appropriate particulate matter control strategies are identified for future rule development, which will only require modifying existing District Rule 402 and creating new rules for the control of windblown dust, which are not part of the Indian Well Valley PM10 Maintenance Plan. The Proposed Project would conform to these control strategies with the incorporation of the recommended mitigation measures.

The EKAPCD developed an ozone redesignation request and maintenance plan for the federal 1-hour ozone standard in 2003 (EKAPCD, 2003). The eastern portion of Kern County was determined to be in attainment of the 1-hour ozone standard by the USEPA in 2004 and deemed a maintenance area (Federal Register, 2004). The District is in the process for being reclassified for the 8-hour ozone standard and the USEPA is reconsidering the level of the federal 8-hour ozone standard, so the initial 8-hour ozone standard attainment plan is not yet due to the USEPA. The 1-hour ozone maintenance plan remains in force until such time as the 8-hour attainment plan is approved. The 1-hour ozone maintenance plan requires no new control measures for maintaining attainment of the 1-hour standard.

The EKAPCD California Clean Air Act Ozone Air Quality Attainment Plan was approved by CARB on February 18, 1993. EKAPCD's most recent Annual Implementation Progress Report for this attainment plan was completed in 2005 (EKAPCD, 2005), and will likely be updated at the same time as the initial federal 8-hour ozone attainment plan is due. The implementation progress report notes that the area is overwhelmingly impacted by upwind transport, with the majority of the ambient ozone pollution in the area being due to pollutants that are transported by the wind from the San Joaquin Valley and South Coast Air Basins. The implementation progress report indicates that no additional control measures are required for attainment of the ozone CAAQS; attainment will occur by reducing the pollution in these adjacent air basins.

Therefore, both the federal and State ozone management plans require no new control measures that would affect the Proposed Project and compliance with existing EKAPCD rules and regulations during construction and operation would ensure conformance with the approved EKAPCD air quality management plans.

Kern County General Plan (KCGP) includes policies, goals, and implementation measures applicable to reduce air quality impacts of a project (Kern County, 2004). Considering the temporary nature of the project construction and the negligible incremental operating emissions of the Project, most of these policies and measures are not applicable to the Proposed Project. Implementation of Mitigation Measure AQ-1 (Implement Fugitive Dust Control Plan) is recommended in conformance with the

applicable policies and the County's recommended implementation measures, as fugitive dust control is required by Policy 20 and 21.

The MDAQMD first adopted a Federal Particulate Matter (PM10) Attainment Plan (PMAP) in July 31, 1995 (MDAQMD, 1995). The PMAP states that "(t)he air quality of the MDAQMD is impacted by both fugitive dust from local sources and occasionally by region-wide wind blown dust during moderate to high wind episodes. This region-wide or "regional" event includes contributions from both local and distant dust sources which frequently result in violations of the NAAQS that are multi-district and interstate in scope." It also states that "(i)t is not feasible to implement control measures to reduce dust from regional wind events." Therefore, there are no measures that are applicable to the Proposed Project, and compliance with existing MDAQMD rules and regulations would ensure compliance with this plan.

The MDAQMD adopted the MDAQMD 2004 Ozone Attainment Plan (approved by USEPA), and has updated it with the MDAQMD Federal 8-hour Ozone Attainment Plan 2008 to demonstrate that the MDAQMD will meet the required federal ozone planning milestones and attain the 8-hour ozone NAAQS by June 2021 (MDAQMD, 2004). There are no additional control measures for direct ozone precursor reductions required as part of the update. However, the MDAQMD is committed to having all applicable Federal Reasonably Available Control Technology (RACT) rules as proposed in their 8-hour RACT State Implementation Plan Analysis (RACT SIP Analysis) adopted in 2006 (MDAQMD, 2006). In addition, the MDAQMD updated and identified new measures in 2007, which will be adopted through 2014, as the State of California mandates including all feasible ozone precursor control measures. There are no measures that are applicable to the Proposed Project since the Project includes no major emission sources.

Therefore, construction of the Proposed Project, with compliance with existing EKAPCD and MDAQMD rules and regulations and implementation of Mitigation Measure AQ-1 (Implement Fugitive Dust Control Plan) proposed below under Section B.3.3.2 (d), would not conflict with or obstruct applicable air quality plans.

b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT*. Construction of the Proposed Project would result in emissions of the following criteria air pollutants: Volatile Organic Compounds (VOCs), NOx, CO, PM10, PM2.5, and sulfur oxides. Emissions from construction would result from fuel combustion and exhaust from construction equipment and vehicle traffic, and fugitive dust from grading and vehicle travel.

For the purposes of environmental review of this type of an infrastructure project, EKAPCD and MDAQMD define a substantial contribution to an existing or projected air quality violation as emitting air pollutants in excess of the thresholds shown in Table B.3.3-3.

Table B.3.3-4 summarizes the total Project emissions and compares them with the EKAPCD and MDAQMD significance thresholds. Only the MDAQMD's daily significance thresholds are applicable to the Proposed Project since the Proposed Project would not include any indirect emission sources that are subject to the EKAPCD's daily significance thresholds. Total daily Project emissions occurring in both Kern County and San Bernardino County are conservatively included in the comparison with the MDAQMD's significance thresholds. The actual daily and annual emissions occurring in the San Bernardino portion of the Project would be considerably less than these total emission estimates since the bulk of the construction activity would be completed within Kern County.

Table B.3.3-3. EKAPCD and MDAQMD Significance Thresholds

	Daily Emissions (lbs/day)						Total Project Emissions (Tons)					
	NOx	VOC	CO	PM10	PM2.5	SO_2	NOx	VOC	CO	PM10	PM2.5	SO_2
EKAPCD Significance Thresholds	137[a]	137[a]	--	--	--	--	25	25	--	15	--	27
MDAQMD Significance Thresholds	137	137	548	82	82	137	25	25	100	15	15	25

Source: Kern County, 1996; MDAQMD, 2009.

[a] – Daily EKAPCD significance thresholds are applicable to indirect vehicle trip emissions only. The proposed project does not create indirect trip generation, such as a housing project, so the project does not have the potential to create significant impacts for the daily EKAPCD significance criteria.

Table B.3.3-4. Estimated Construction Emissions

	Daily Emissions (lbs/day)[a]						Total Project Emissions (Tons)					
	NOx	VOC	CO	PM10	PM2.5	SO_2	NOx	VOC	CO	PM10	PM2.5	SO_2
Substation												
Construction Equipment & Vehicle	n/a	n/a	n/a	n/a	n/a	n/a	1.35	0.17	0.66	0.07	0.06	0.001
Fugitive Dust	n/a	n/a	n/a	n/a	n/a	n/a	--	--	--	0.94	0.50	--
Motor Vehicle Trips	0.43	0.43	4.21	0.045	0.029	0.005	0.006	0.006	0.060	0.001	0.000	0.000
115 kV Relay Upgrade												
Construction Equipment & Vehicle	n/a	n/a	n/a	n/a	n/a	n/a	3.72	0.36	1.33	0.15	0.14	0.004
Fugitive Dust	n/a	n/a	n/a	n/a	n/a	n/a	--	--	--	1.62	0.86	--
Motor Vehicle Trips	1.51	1.52	14.75	0.159	0.101	0.019	0.008	0.008	0.078	0.001	0.001	0.000
Fiber Optic Telecom System												
Construction Equipment & Vehicle	n/a	n/a	n/a	n/a	n/a	n/a	0.62	0.07	0.26	0.03	0.01	0.007
Fugitive Dust	n/a	n/a	n/a	n/a	n/a	n/a	--	--	--	0.41	0.24	--
Motor Vehicle Trips	0.19	0.19	1.86	0.020	0.02	0.002	0.002	0.002	0.021	0.000	0.000	0.000
Project Total	2.15	2.15	20.82	0.224	0.142	0.026	5.71	0.62	2.34	3.22	1.81	0.01
EKAPCD Significance Thresholds	n/a	n/a	n/a	n/a	n/a	n/a	25	25	--	15	--	27
MDAQMD Significance Thresholds	137	137	548	82	82	137	25	25	100	15	15	25
Exceeds Significance Thresholds?	No	No	No	No	No	No	No	No	No	No	No	No

Notes: Annual emissions from motor vehicle trips are estimated by staff as presented in Appendix 3.

Source: SCE, 2011 - Data Request 2-9; SCE, 2010a; Appendix 3.

(a) Indirect vehicle trip emissions only.

As shown in Table B.3.3.4, the Proposed Project's construction emissions would not exceed any of the significance thresholds established by EKAPCD and MDAQMD. Therefore, the Proposed Project would have less than significant impacts during construction.

DURING OPERATIONS, *LESS THAN SIGNIFICANT*. The Proposed Project would not add any new facilities, but would upgrade and expand the existing Downs Substation, route an existing transmission line into and out of the substation, and add fiber optic telecommunication cable to existing 115 kV poles (with six replacement poles). Therefore, the Proposed Project should not require additional operations/ maintenance efforts. In addition, the Proposed Project would not have any stationary emissions sources during operations. The operating emissions would be the same as the existing emissions generated from vehicles usage during periodic inspection, maintenance, and repair activities. For the Downs Substation,

routine maintenance, including equipment testing, monitoring, and repair, would occur three to four times per month and these activities would require less than ten trips per month. The energized 115-kV subtransmission overhead facilities would be inspected at least once per year via ground and/or aerial observation. Therefore, no incremental operating emissions are expected, and the impacts during operations would be less than significant.

c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT*. As shown in Table B.3.3-4, construction of the Proposed Project would not result in emissions of criteria pollutants that exceed significance thresholds established in plans adopted by the EKAPCD and the MDAQMD to achieve attainment with State and federal air quality standards. Therefore, the Proposed Project would not contribute significantly to a cumulatively considerable net increase of any pollutants, and would have a less than significant air quality impact.

DURING OPERATIONS, *LESS THAN SIGNIFICANT*. The operating emissions would be the same as the existing emissions that are generated from vehicles usage during periodic inspection, maintenance, and repair activities. Therefore, no incremental operating emissions are expected, and the air quality impact during operations would be less than significant.

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*. Receptors that may be impacted by the Proposed Project include individuals using the ball fields at the Kerr McGee Youth Sports Complex, which is located immediately south of the existing Downs Substation, during construction of the proposed substation expansion, and residents near the existing Downs Substation, along the Inyokern-McGen-Searles No. 1 and No. 2 115 kV subtransmission line routes where the fiber optic telecommunication system would be installed. There is the potential for temporary high fugitive dust and valley fever spore exposures during substation construction. The linear construction for adding the fiber optic cable to the existing 115 kV poles and replacement of six of these poles would have lower potential for emissions and would not impact any single location/receptor significantly due to the continuous moving nature of these construction activities.

To ensure that fugitive dust emissions would be reduced to the maximum extent, Mitigation Measure AQ-1 (Implement Fugitive Dust Control Plan) is recommended. This recommended mitigation measure would reduce particulate emissions to the extent feasible in accordance with EKACPD requirements and Kern County policies. Implementation of Mitigation Measure AQ-1 would reduce the potential for temporary high fugitive dust exposures and the risk of contracting Valley Fever by construction workers and area residents. Therefore, with implementation of Mitigation Measure AQ-1, the Proposed Project would result in less than significant impacts on sensitive receptors.

Mitigation Measure for Construction-Phase Air Quality

AQ-1 **Implement Fugitive Dust Control Plan.** The Applicant shall develop a Fugitive Dust Control Plan to reduce PM10 and PM2.5 emissions during substation construction. The Fugitive Dust Control Plan shall include:

a. Name(s), address(es), and phone number(s) of person(s) responsible for the preparation, submission, and implementation of the plan;

b. Description and location of operation(s); and

c. Listing of all fugitive dust emissions sources included in the operation.

d. The following dust control measures shall be implemented:

   i. All on-site unpaved roads shall be effectively stabilized in a manner that can be determined to be as efficient as or more efficient for fugitive dust control than Air Resources Board-certified soil stabilizers, and shall not increase any other environmental impacts including loss of vegetation.

   ii. All material excavated or graded will be sufficiently watered to prevent excessive dust. Watering will occur as needed with complete coverage of disturbed areas. Excavated soil piles shall be watered as needed and in compliance with EKAPCD Rule 402 and MDAQMD Rule 403.2 (as applicable) for the duration of construction or covered with temporary coverings.

   iii. Construction activities that occur on unpaved surfaces will be discontinued during windy conditions when those activities cause visible dust plumes that extend beyond the substation fence line, or extend more than 100 yards from the activity causing the dust for construction activities occurring outside of the substation.

   iv. Track-out shall not extend 25 feet or more from an active operation and track-out shall be removed at the conclusion of each workday.

   v. Shaker plates and gravel beds will be used and maintained throughout the construction period to remove bulk material from tires and vehicle undercarriages before vehicles exit the Downs Substation property.

   vi. All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions), and shall have adequate freeboard to avoid spillage around the edges of the cover.

   vii. Traffic speeds on unpaved roads shall be limited to 15 mph.

   viii. Other fugitive dust control measures as necessary to comply with Eastern Kern Air Pollution Control District (EKAPCD) Rules and Regulations.

DURING OPERATION, *LESS THAN SIGNIFICANT*. The operating emissions would be the same as the existing emissions that are generated from vehicles usage during periodic inspection, maintenance, and repair activities. Therefore, no incremental operating emissions are expected, and the Project's operating emissions would not expose sensitive receptors to substantial pollutant concentrations.

e. Would the project create objectionable odors affecting a substantial number of people?

LESS THAN SIGNIFICANT. The Proposed Project includes short-term construction activities that would involve combustion of diesel fuel and emissions of dust. Odors from these sources are not significantly objectionable and would only be created during a very limited time during construction. Operational activities do not include any major odor sources, and are generally limited to vehicle trips. Therefore, odor impacts of the Proposed Project would be less than significant.