



Eastern Kern

Air Pollution Control District

Gary Ray, Jr.
Air Pollution Control Officer

March 24, 2026

Boris Sanchez, CPUC Project Manager
Cal City Substation Project; Attn. M. Hensel
c/o Environmental Science Associates
775 Baywood Drive; Suite 100, Petaluma, CA 94954

SUBJECT: Comments on Draft Environmental Impact Report for Cal City Substation 115 kV Upgrade Project

Dear Mr. Sanchez:

The Eastern Kern Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Cal City Substation 115 kV Upgrade Project.

The Project appears to propose temporarily disturbing 694.9 acres of land and permanently disturbing 206.7 acres of land, largely within the jurisdiction of the District. In accordance with District Rule 402 (Fugitive Dust), any construction activity on any site involving 10 or more contiguous acres of disturbed surface area is defined as a "Large Project"; owners/operators of large projects are required to submit a Fugitive Dust Emission Control Plan to the District for approval prior to commencing construction activities.

District Rule 402 also specifies the following requirements:

- A person shall not cause or allow fugitive dust emissions from any active project, open storage pile, or disturbed surface area to remain visible in the atmosphere beyond the property line of the emission source.
- A person shall not cause or allow fugitive dust emissions from any applicable source such that the dust causes 20% opacity or greater during each observation and the total duration of such observations (not necessarily consecutive) is a cumulative three minutes or more in any one hour.
- An owner/operator of any active project subject to this Rule shall implement one or more fugitive dust emission control strategy listed in Table 1, Reasonably Available Control Measure (RACM) or Table 2, Bulk Material Control Measures (BMCM) to limit visible dust emissions (VDE) to no more than 20% opacity and meet the conditions for a stabilized surface (as defined in Section III.RR of the Rule)

Thank you for your cooperation in this matter. Should you have any questions, please telephone Jeremiah Cravens of our office at (661) 862-5250.

Sincerely,

A handwritten signature in blue ink that reads "Gary Ray, Jr." in a cursive style.

Gary Ray, Jr.
Air Pollution Control Officer

GR:SJ