



December 9, 2025

California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

**Subject: Collinsville 500/230 Kilovolt Substation Project
Draft Environmental Impact Report SCH# 2025010149**

To Whom It May Concern:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the Draft Environmental Impact Report (DEIR) for the Collinsville 500/230 Kilovolt Substation Project (Project). The proposed Project involves constructing the new Collinsville Substation, two 500 kV interconnection lines connecting Collinsville Substation to PG&E's existing Vaca Dixon-Tesla 500 kV Transmission Line, and a 230 kV transmission line connecting Collinsville Substation to PG&E's existing Pittsburg Substation, as well as constructing other ancillary infrastructure and modifying PG&E's existing facilities associated with interconnection.

A portion of the Project resides within the Sac Metro Air District's jurisdiction. As such, we offer the following comments to benefit air quality and public health and reduce greenhouse gas emissions.

Construction Emissions

The DEIR demonstrates that constructing the Project will result in significant Oxides of Nitrogen (NO_x) emissions within the Sac Metro Air District's jurisdiction, which is within the Sacramento Federal Nonattainment Area (SFNA)¹. The DEIR estimates that this would result in approximately 556.4 lbs/day of NO_x, which exceeds our threshold of 85 lbs/day.

To reduce the emissions, the DEIR includes construction measure **AIR-1**, which requires all construction equipment with a rating between 100 and 750 horsepower (hp) to use engines compliant with EPA Tier 4 non-road engine standards and **MM AQ-2**, which requires marine vessels to use Tier 3 engines at a minimum and Tier 4 engines contingent on availability.

- To ensure consistent and enforceable emission reductions across all equipment types, we request that **AIR-1** be formally incorporated as a mitigation measure—parallel to **MM AQ-2**—so that its Tier 4 engine requirements function as mandatory mitigation rather than an optional construction measure. Currently, section 4.3.14 *Mitigation Measures* does not show this mitigation measure.
- Please consider revising the language in **AIR-1** to include construction equipment with a rating between 50 and 750 hp. Revising the lower part of the range to 50 hp would allow more

¹ Table 4.3-26 of the DEIR. Proposed Project Construction Emissions within SMAQMD

equipment to be covered under the measure and would align with Sac Metro Air District recommendations, which can be found here:

<https://www.airquality.org/LandUseTransportation/Documents/Ch3On-SiteEnhancedExhaustMitigationFinal4-2019.pdf>

However, even after implementation of this mitigation, the estimated construction emissions are still over the threshold, at 260.8 lbs/day of NOx. The DEIR states that the resulting impact would be significant and unavoidable.

Projects can participate in an offsite mitigation fee program to further ensure that construction air quality impacts are reduced to less-than-significant levels. Incorporating a mitigation fee not only strengthens the enforceability of the mitigation framework but also enhances the legal defensibility of the DEIR by demonstrating that all feasible measures have been adopted to reduce impacts. With this, Sac Metro Air District recommends the following:

- Any emissions remaining above the threshold should be mitigated through the payment of an offsite mitigation fee. Fees shall be paid based upon the Sac Metro Air District NOx reduction fee rate in place at the time of payment. For more information, see <https://www.airquality.org/residents/ceqa-land-use-planning/mitigation>. For language that can be incorporated into the document, please see <https://www.airquality.org/LandUseTransportation/Documents/Ch3Off-SiteMitigationFeesFinal4-2019.pdf>. If you have additional construction mitigation questions, please reach out to Sac Metro Air District staff at CMPlan@airquality.org.
- Sac Metro Air District also recommends that the Project implement our [Enhanced On-Site Exhaust Controls](#), which calls for the Project applicant, or its designee, to provide a plan for approval by the Sac Metro Air District that demonstrates the heavy-duty off-road vehicles (50 horsepower or more) to be used 8 hours or more during the construction project will achieve a project wide fleet-average 10% NOx reduction² compared to the most recent California Air Resources Board (CARB) fleet average. This would include utilizing the [Construction Mitigation Tool](#) and the [Harborcraft Tool](#) prior to and during construction activities.

Operations and Maintenance

The DEIR notes that the cables associated with the proposed LSPGC 230 kV submarine segment would not require regular maintenance; however, in the event of a defective cable, the cable segment would need to be replaced³. As part of this replacement, the DEIR estimates that emissions would be similar to that of the proposed Project construction.

Sac Metro Air District appreciates that the DEIR includes discussion of this hypothetical scenario, which provides helpful context regarding potential emissions associated with a cable replacement event. Should replacement become necessary in the future, Sac Metro Air District staff is available to help address any associated air quality considerations. If you have any questions, please reach out to us at ProjectReview@airquality.org.

² Acceptable options for reducing emissions may include use of cleaner engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.

³ Page 4.3-45 of the DEIR

Conclusion

Thank you for your attention to our comments. If you have questions about them, please contact Roberto Ramirez at rramirez@airquality.org or 916-704-4552.

Sincerely,

Roberto

Roberto Ramirez
Air Quality Planner / Analyst

c: Rich Muzzy, Program Supervisor, Sac Metro Air District