



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

June 12, 2018

CircleCityEIR@esassoc.com

Robert Peterson, Circle City Project
c/o Matthew Fagundes, Environmental Science Associates
1425 N. McDowell Blvd., Suite 200
Petaluma, CA 94954

Draft Environmental Impact Report (Draft EIR) for the Proposed Circle City Substation and Mira Loma-Jefferson 66 kV Subtransmission Line Project (SCH No.: 2016021012)

The South Coast Air Quality Management District (SCAQMD) staff 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 EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a 66/12 kilovolt (kV) substation, six underground 12 kV distribution getaways, four 66 kV subtransmission source lines, and a 10.9-mile 66 kV subtransmission line on 19.5 acres (Proposed Project). The Proposed Project would also relocate 1.9 miles of 33 kV distribution line and install telecommunication facilities. Construction of the Proposed Project is expected to take approximately 18 months¹.

SCAQMD Staff's Summary of Air Quality and Health Risk Assessment Analyses

In the Air Quality Analysis, the Lead Agency identified overlapping construction activities that were capable of contributing to the combined total estimated peak daily emissions². As shown in Table 4.3-4, *Project Peak Daily Construction Emissions*, construction emissions for each criteria pollutant from five Project components were combined. The five Project components were Circle City Substation, Mira Loma Substation, Source Lines, Mira Loma-Jefferson 66 kV Line, and Telecommunication Lines³. Subsequently, the Lead Agency compared the combined total construction emissions to SCAQMD air quality CEQA significance thresholds to determine the level of significance. Additionally, the Lead Agency conducted a health risk assessment (HRA) and found that the Proposed Project's mitigated maximum individual cancer risk at the residential uses east of the Circle City Substation was 7.1 in a million, which would be below SCAQMD CEQA threshold of significance of 10 in a million for cancer risk.

SCAQMD Staff's Comments

Based on a review of HRA technical documentation, SCAQMD staff found that the mitigated maximum individual cancer risk of 7.1 in a million was calculated based on the annual emissions at one Project component (e.g., Circle City Substation). Since construction activities at the Circle City Substation would overlap with construction activities at the other four components, and to analyze the worst-case impact scenario, the Lead Agency should use the combined annual emissions from the overlapping construction activities to calculate the Proposed Project's cancer risk in the Final EIR.

¹ MND. Page 2-58.

² MND. Page 4.3-14.

³ MND. Page 4.3-15.

Robert Peterson
c/o Matthew Fagundes

June 12, 2018

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov or Daniel Garcia, Program Supervisor, at dgarci@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS/SW
RVC180606-02
Control Number