



South Coast Air Quality Management District

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FAXED: MARCH 29, 2005

March 29, 2005

Mr. Jack W. Caswell
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

**Preliminary Staff Assessment for the Blythe Energy Transmission Line Modifications (PSA
99-AFC-8C)
Riverside County**

Dear Mr. Caswell:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for allowing additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Staff Assessment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Staff Assessment. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

RVC050127-02
Control Number

Preliminary Staff Assessment (PSA) for the Blythe Energy Project Transmission Line (BEPTL) Modifications (99-AFC-8C)

Project Air Quality Emissions: On page 2-3 and 2-4 of the Project Description, the lead agency describes two components of the proposed project, Midpoint Substation and Desert Center, that involve construction of new facilities. No mention is made in the PSA of construction activities associated with installing the single-pole transmission line structures. On page 4.1-3 of the PSA, the lead agency states, “Though construction emissions from the BRPTL project would be both short-term and concentrated in the vicinity of the construction, they have the potential to be significant since the region is classified as nonattainment for both PM10 and ozone.” The lead agency, however, does not provide any quantitative estimates of emissions from construction activities. The lead agency proposes several mitigation measures along with their control efficiencies. The lead agency states on page 4.1-7 of the PSA that “If the construction conditions of certification proposed (referring to the mitigation measures) are implemented, staff is confident that the short-term air quality impacts from the construction of the proposed BEPTL would not be significant.”

Although the lead agency includes a comprehensive list of construction mitigation measures, without quantifying emissions during construction (and operation, i.e., maintenance activities), the lead agency has not demonstrated that the implementation of the proposed mitigation measures would reduce construction emissions to less than the level of significance. To calculate potential adverse air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use either the emission calculation methodologies from the SCAQMD 1993 CEQA Air Quality Handbook or use the current version of the California Air Resources Board (CARB)-approved model URBEMIS 2002, which is available on the SCAQMD website at: www.aqmd.gov/ceqa/models.html