



**South Coast  
Air Quality Management District**  
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SENT VIA E-MAIL AND USPS:  
[SOCRE.CEQA@ene.com](mailto:SOCRE.CEQA@ene.com)

September 24, 2015

California Public Utilities Commission  
RE: SOCRE Project  
c/o Ecology and Environment, Inc.  
505 Sansome Street, Suite #300  
San Francisco, CA 94111

**Recirculated Draft Environmental Impact Report (Draft EIR) for the Proposed  
South Orange County Reliability Enhancement (SOCRE) Project**

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. In the project description, the lead agency proposes to rebuild, replace, and upgrade substations and transmission lines throughout San Juan Capistrano, San Clemente, and unincorporated Orange County. The construction of the proposed SOCRE project is expected to take 64 months.

In the Air Quality Section, the lead agency quantified the project's construction air quality impacts and compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the lead agency has determined that construction air quality impacts will exceed the recommended regional daily threshold for ROG, NOX, PM10, and PM2.5 as well as exceed the recommended localized daily thresholds for PM10 and PM2.5. Even with mitigation measure APM AQ-1, APM AQ-2, and MM AQ-1 the regional and localized construction air quality impacts would remain significant and unavoidable. SCAQMD staff recommends that the lead agency include additional mitigation to further minimize these impacts. Additional details are included in the attachment.

The SCAQMD staff is available to work with the lead agency to address these concerns and any other air quality questions that may arise. If you have any questions regarding this letter, please contact me at [jcheng@aqmd.gov](mailto:jcheng@aqmd.gov) or call me at (909) 396-2448.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.  
Program Supervisor  
Planning, Rule Development & Area Sources

JW:JC  
ORC150811-05  
Control Number  
Attachment

## Attachment

**MM AQ-1: Oxides of Nitrogen (NOx) Credits.** The emissions of NOx due to construction of the proposed project will be mitigated through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs) for every pound of NOx emissions in excess of the SCAQMD regional significance threshold of 100 pounds per day. The total amount of NOx RTCs to be purchased will be calculated when the construction schedule is finalized. The applicant will purchase and submit the required RTCs to the SCAQMD prior to the start of project construction. The applicant will also track actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage.

NOx RTCs used for mitigation might consist of so called “anyway” RTCs, that is, NOx RTCs derived from cutting back operations or from shutting down equipment and, therefore, might not have been used anyway. Because of the reductions in annual allocations achieved to date and the future required shave in NOx annual allocations, it is not likely that facilitates would still have anyway RTCs available. Additionally, the provision is difficult if not impossible to enforce.

The lead agency should first attempt to reduce construction NOx emissions by using off-road construction equipment that meets lower future emission standards, alternative fuels and control technology on the construction equipment.

Furthermore, the lead agency shall purchase the amount of pounds of NOx emission credits needed to mitigate the exceedance of the construction significance threshold for NOx emissions from the construction phase of the project. The offset credits must meet the following criteria:

1. The lead agency must demonstrate that the emission credits were derived from emission reduction project(s) through existing SCAQMD protocols.
2. The credit needs to be current for the time the project takes place meaning the RTCs/Mobile Source Emission Reduction Credits (MSERCs) have not expired before or during the time period when the emissions from the project would occur.

The lead agency is required to retire the entire amount of NOx emissions credits needed to mitigate the exceedance of the construction significance threshold for NOx emissions prior to commencement of the construction project.

### **Construction Mitigation Measures for Reducing NOx emissions**

SCAQMD staff recommends that APM AQ-2 be replaced with the following construction Mitigation Measures:

- All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Alternatively, the Lead Agency could rely on the Green Construction Policy<sup>1</sup> used by LA County Metro or the ports of Los Angeles/Long Beach. These policies include provisions to ‘step down’ from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met.

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<sup>1</sup> Los Angeles County Metropolitan Transportation Authority, July 21, 2011:  
<http://www.metro.net/about/search/?q=green%20construction%20policy>

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Improve traffic flow by signal synchronization.

#### **Additional Construction Mitigation Measures for Reducing PM Emissions**

The lead agency should identify and incorporate additional mitigation measures to further reduce PM10 and PM2.5 emissions from construction related activities. Please see SCAQMD Rule 403<sup>2</sup> – Tables 1, 2, and 3 for additional control PM control measures.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

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<sup>2</sup> South Coast Air Quality Management District – Rule 403 – Fugitive Dust  
<http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>