



South Coast Air Quality Management District

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

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SENT VIA E-MAIL:

SubstationProgram@ladwp.com

Jazmin Martin, Environmental Specialist
Los Angeles Department of Water and Power
Environmental Planning and Assessment
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Notice of Preparation of a Draft Program Environmental Impact Report for
Substation Program (Proposed Project)
(SCH No.: 2026090502)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. The following comments provide observations and may include recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Program Environmental Impact Report (PEIR). Please transmit copy of the Draft PEIR upon its completion and public release directly to South Coast AQMD. **In the transmittal, please also provide electronic versions of all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses in their original format (e.g., not in .pdf), including but not limited to emission calculation spreadsheets, air quality modeling files, and health risk assessment input and output files.**

CEQA Air Quality Analysis

According to the Notice of Preparation of a Draft PEIR, the Los Angeles Department of Water and Power (LADWP), as the Lead Agency, proposes to modernize its electrical distribution system through 2045 to meet increasing electricity demand driven by population growth, energy-intensive industries, and the electrification of fossil-fuel-powered activities. The Proposed Project includes constructing four new distributing substations, expanding existing substations, making minor substation improvements, and implementing other distribution system upgrades within LADWP's in-basin service area. The proposed new substations are being considered in four study areas: Sun Valley, Silver Lake, Southeast, and Wilmington. The Proposed Project aims to improve system reliability, redundancy, and resilience to extreme climate events while supporting state and local clean energy mandates. However, the Lead Agency has determined that the Proposed Project may result in potentially significant environmental impacts under CEQA, including impacts related to air quality and greenhouse gas emissions.

Since the upcoming Draft PEIR will need to analyze the potential environmental impacts of the Proposed Project, the Lead Agency is recommended to include an evaluation in the Draft PEIR of a reasonably foreseeable scenario which reflects the maximum development intensity that would be allowed under the proposed land use designations and associated infrastructure expansion at

full buildout and disclose the air quality, greenhouse gas, and health risk implications of this growth to the fullest extent feasible.

The Lead Agency should identify all air pollutant sources related to the Proposed Project and analyze/quantify any and all potential air quality and greenhouse gas impacts that could occur during all phases (including overlapping phases) of construction (including demolition) and operation activities associated with the future development that may result from implementing the Substation Program. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality and greenhouse gas impacts may include, but are not limited to, area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality and greenhouse gas impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, if the Lead Agency elects to rely on South Coast AQMD's Air Quality Significance Thresholds,¹ the emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's air quality significance thresholds for *operation* to determine the level of significance.

The Lead Agency is recommended to rely on the guidance provided in the South Coast AQMD's CEQA Air Quality Handbook and website² when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency uses the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod)³ software, to quantify emissions of air pollutants from typical land use development project.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially if heavy-duty diesel-fueled vehicles will be used, it is recommended that the Lead Agency performs a mobile source health risk assessment.⁴

South Coast AQMD has developed a methodology⁵ to assist lead agencies with analyzing localized air quality impacts from site-specific projects located near sensitive receptors. However, because scale of the Proposed Project is large and programmatic in nature, the screening tables which contain localized significance thresholds (LSTs) cannot be relied upon to determine localized impacts. Instead, the Lead Agency is recommended to evaluate the potential localized air quality impacts from the Proposed Project by conducting air dispersion modeling to determine whether the applicable ambient air quality standards would be exceeded.

¹ South Coast AQMD Air Quality Significance Thresholds can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>.

² South Coast AQMD's CEQA Air Quality Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

³ CalEEMod is available free of charge at: www.caleemod.com.

⁴ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁵ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

Also, if implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, wastewater-related equipment, electrical infrastructure, etc., one or more air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency under CEQA to a Responsible Agency as defined in CEQA Guidelines Section 15381. The assumptions in the air quality analysis in the PEIR will be the basis for evaluating the air permit(s) under CEQA and imposing permit conditions and limits. Questions about air permit requirements should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

In addition, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Draft PEIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project, if applicable. Also, as set forth in CEQA Guidelines Section 15086, the Lead Agency is required to consult with all Responsible Agencies with discretionary approval authority over the Proposed Project. Thus, if air permits are required and South Coast AQMD is identified as a Responsible Agency, please let this comment letter serve as South Coast AQMD's request to convene a meeting with the Lead Agency as required by CEQA Guidelines Section 15104 to discuss the scope and content of the environmental information that will need to be included in the Draft PEIR.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,⁶ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,⁷ and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.⁸

The Lead Agency is recommended to consider including mitigation measures and planning strategies for reducing operational and exposure-related air quality impacts from future development facilitated by the Proposed Project in the Draft PEIR, as follows:

1. Encourage zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), when feasible. The Lead Agency should require a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. Require the use of

⁶ South Coast AQMD's CEQA Air Quality Handbook, Available at: <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

⁷ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

⁸ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

2017 model year or newer, cleaner trucks, if ZE or NZE trucks are not feasible. All heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard.⁹ Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructure in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

Information on CERP for the Designated AB 617 ELABHWC, SELA, SLA, and WCWLB Communities

The Proposed Project area includes the AB 617-designated East Los Angeles, Boyle Heights, and West Commerce (ELABHWC), Southeast Los Angeles (SELA), South Los Angeles (SLA), and Wilmington, West Long Beach, Carson (WCWLB) communities which are heavily impacted by air pollution generated from sources such as ports, refineries, oil and gas industry, heavy-duty diesel trucks, warehouses, and railroad activities. As part of the AB 617 process, South Coast AQMD is required to work with a Community Steering Committee (CSC) to develop a Community Emission Reduction Plan (CERP) that identifies air quality priorities and related actions to reduce air pollution in the community. The South Coast AQMD Governing Board adopted the ELABHWC CERP on September 6, 2019¹⁰, the SELA CERP on December 4, 2020¹¹, the SLA CERP on June 3, 2022¹², and the WCWLB CERP on September 6, 2019¹³. The Draft PEIR for the Proposed Project serves as the first-tier, programmatic level environmental analysis that can provide guidance to subsequent, project-level environmental analyses. It is recommended that the Lead Agency review the actions to reduce air pollution in the community included in Chapter 5 of the ELABHWC, SELA, SLA, and WCWLB CERPs. It is also recommended that the Lead Agency continue working with South Coast AQMD to explore whether additional measures to mitigate or further reduce emissions can be implemented at the Proposed Project to support actions in the WCWLB CERP and SELA CERP.

⁹ In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NOx emission standard is available at: <https://ww2.arb.ca.gov/our-work/programs/optionalreduced-nox-standards>

¹⁰ South Coast AQMD. September 2019. Assembly Bill 617 East Los Angeles, Boyle Heights, and West Commerce Community Emissions Reduction Plan. Access at: <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/southeast-los-angeles/final-cerp/final-cerp.pdf>.

¹¹ South Coast AQMD. December 2020. Assembly Bill 617 Southeast Los Angeles Community Emissions Reduction Plan. Access at: <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/southeast-los-angeles/final-cerp/final-cerp.pdf>.

¹² South Coast AQMD. June 2022. Assembly Bill 617 South Los Angeles Community Emissions Reduction Plan. Access at: <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/final-cerp.pdf>.

¹³ South Coast AQMD. September 2019. Assembly Bill 617 Wilmington, West Long Beach, Carson Community Emissions Reduction Plan. Access at: <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf>.

Measures to Further Reduce Construction-Related Emissions

Based on the map of “Study Areas for Proposed New Distributing Substations”¹⁴, the Proposed Project is in expected to occur in high density urban environment and impact immediately adjacent sensitive receptors, including residences, schools, childcare centers, and hospitals. The Lead Agency concludes that the Proposed Project would have significant air quality impacts. Construction activities at the Proposed Project are directly related to several air quality priority concerns identified in the ELABHWC, SELA, SLA, and WCWLB CERPs, including the reduction of fugitive dust (PM10) and diesel particulate matter (DPM) emissions, and the reduction of community exposure to localized air pollution. To further reduce construction-related emissions in a disproportionately impacted community, it is recommended that the Lead Agency takes the following mitigation measures into consideration:

- Use zero- or near-zero emission construction equipment where feasible
- Implement enhanced dust control measures (e.g., soil stabilizers, paving unpaved roads)
- Limit idling of diesel equipment and designate staging activities away from sensitive receptors
- Provide community notifications regarding construction schedules and dust-generating activities
- Participate in CARB’s California Clean Construction (CCC) program¹⁵, including use of the zero-emission off-road construction equipment where feasible, and the use of cleanest available diesel technology for diesel equipment used

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Zoya Banan, Ph.D., Air Quality Specialist, at ZBanan@aqmd.gov or me at SWang1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:ZB

LAC260915-02

Control Number

¹⁴ Notice of Preparation of a Program Environmental Impact Report for the Substation Program, Figure 1.

¹⁵ CARB’s California Clean Construction (CCC) program is available at: <https://ww2.arb.ca.gov/california-clean-construction-program>