

DEPARTMENT OF TRANSPORTATION

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a California Way of Life*

September 17, 2024

Sina Taghvaei, Air Quality Specialist
South Coast AQMD
21865 Copley Dr
Diamond Bar, CA 91765

RE: Proposed Amended Rule (PAR)
1135 – Emissions of Oxides of Nitrogen
from Electricity Generating Facilities –
Subsequent EIR (SBE)
SCH #2016071006
GTS #07-MULTIPLE-2018-00407
LA Vic. Multiple

Dear Sina Taghvaei,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. By statute, the South Coast Air Quality Management District (AQMD) is required to adopt an air quality management plan (AQMP) demonstrating compliance with all federal and state ambient air quality standards for the areas under the jurisdiction of the South Coast AQMD. The AQMP is a regional blueprint for how the South Coast AQMD will achieve air quality standards and healthful air, and it contains multiple goals promoting reductions of criteria air pollutants, greenhouse gases (GHGs), and toxic air contaminants (TACs). Proposed Amended Rule (PAR) 1135 applies to electric generating units at electricity generating facilities that are investor-owned electric utilities, publicly owned electric utilities, or have a generation capacity of at least 50 MW of electrical power for distribution in the state or local electrical grid system.

The November 2018 Final Mitigated SEA for Rule 1135 previously analyzed the construction and operational transportation and traffic impacts at six affected facilities to comply with the proposed emission limits. The assessment concluded less than significant transportation and traffic impacts relative to: 1) the peak daily work force that would be needed during construction and their associated trips; 2) peak daily number of heavy-duty truck trips during construction; and 3) peak daily number of heavy-duty truck

trips during operation. While implementing the proposed project might result in incremental increases in the number of trips that may occur during construction and operation, the increases do not exceed the significance criteria of 350 round trips per day for transportation and traffic.

After reviewing the SBE, Caltrans has the following comments:

Construction of the proposed project would temporarily increase the transport of hazardous materials in the project area due to the storage and use of aqueous ammonia. Before construction begins, Caltrans recommends that the construction contractor develop a project-specific contingency plan to reduce the potential for spills during transportation of hazardous materials. The following measures are recommended for implementation:

- All project equipment will be subject to leak inspections before being brought on-site and regularly during construction.
- All vehicles will be inspected for leaks and other potential safety hazards before transporting hazardous materials.
- All hazardous materials will be clearly marked with the appropriate signage or labels, securely contained, and properly identified, including the duration of transportation.

Any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will require a Caltrans transportation permit. Caltrans recommends limiting construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review. We look forward to the coordination of our efforts to ensure potential impacts to the highway facilities and traveling public are discussed and addressed before work begins.

If you have any questions, please contact project coordinator Frances Duong, at frances.duong@dot.ca.gov and refer to GTS #07-MULTIPLE-2018-00407.

Sincerely,



Anthony Higgins
Acting LDR/CEQA Branch Chief

Cc: State Clearinghouse