South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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DSBPRP_Public_Comments@sanbag.ca.gov

Mr. Mitchell A. Alderman P.E.
Director of Transit and Rail Program
1170 W. 3rd Street, 2nd Floor
San Bernardino, CA 92410

Review of the Draft Environmental Impact Report (Draft EIR) for the Downtown San Bernardino Passenger Rail Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

The AQMD staff recognizes the potential long term regional air quality benefits from the proposed passenger rail project that may reduce vehicle miles traveled (VMT) in the region. However, the AQMD staff is concerned about the project's contribution of diesel related emissions to an area that has elevated health risk impacts. Based on a health risk assessment conducted by the California Air Resources Board (ARB) the BNSF Railyard that is directly adjacent to the proposed project poses a cancer risk of up to 3,300 in a million in the surrounding area[1]. Therefore, the lead agency should consider the inclusion of cleaner engines for locomotives to minimize the project's local air quality impacts to the area. Clarification of some of the air quality calculations should also be provided in the Final EIR. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any

[1] http://www.arb.ca.gov/railyard/hra/bnsf_sb_final.pdf

other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

SBC120608-03
Control Number

Minimization of Operational Emissions

1. The AQMD staff recognizes that the proposed project may provide regional air quality benefits by reducing overall VMT in the region. However, the AQMD staff is concerned about the overall potential health risk impacts to existing and future sensitive land uses (e.g., residences, parks, schools, and hospitals) that surround the project site. Specifically, the lead agency is proposing to construct a new rail line that will facilitate up to an additional 88 diesel train trips per day adjacent or in close proximity to sensitive land uses. In addition to other significant local sources of toxic air contaminants including the BNSF Railyard and the Interstate 215 Freeway the locomotives required for the project will expose surrounding sensitive receptors to additional diesel emissions. Therefore, the AQMD staff recommends that the lead agency ensure that the project's air quality impacts are minimized by providing zero emissions technologies for all locomotives. In the event that zero emissions technology is unavailable for the project the lead agency should provide a discussion in the Final EIR on the feasibility of lower emitting technologies (e.g., Tier 2+, Tier 3 and Tier 4 Engines) and make a clear commitment to the cleanest technology that is determine to be feasible for the project. This commitment could include actions that occur after commencement of project operations, when newer technologies will become available.

Operational Emissions Calculations

2. In Appendix D of the Air Quality Technical Memorandum for the Draft EIR, the locomotive Diesel Particulate Matter (DPM) idling emission rate is listed as 0.00801 grams per second (g/s) for the Health Risk Assessment calculation. It is unclear how this emission rate was calculated. In the Train Emission Calculations spreadsheet in Appendix B the maximum annual PM10 emission rate is listed as 0.007 g/s, similar but lower than the DPM rate in Appendix D. The PM10 emission rate also assumes no rail activity on weekends, therefore the calculations in this spreadsheet may not include all annual emissions expected from this project. Further clarification should be provided about the methodology used to generate the 0.00801 g/s DPM emission rate. If the PM10 rate was used, then additional locomotive activity on weekends may need to be added to obtain an appropriate annual emission rate.

3. Idling Emissions From Track Sharing

   Based on Figure ES-1 of the Draft EIR it appears that the proposed project may require shared use on a portion of the proposed track with BNSF. Therefore, the lead agency should provide additional discussion in the Final EIR of the operational activity that will occur on this portion of the track. In the event that the lead agency determines that shared use of the track could result in additional BNSF or Metrolink idling emissions from track switching the lead agency should revise the air quality analysis to ensure that the project's operational impacts account for these emissions.

4. Cumulative Air Quality Impacts

The proposed project will extend east of the 215 Freeway terminating at E Street in the City of San Bernardino, however, according to a Notice of Preparation published by the lead agency in April of 2012 this project will connect to the Redlands Passenger Rail Project that will terminate in the City of Redlands. Therefore, the AQMD staff recommends that the lead agency include the foreseeable impacts from the Redlands Passenger Rail Project in a cumulative air quality analysis consistent with Section 15130 of the CEQA Guidelines.