South Coast
Air Quality Management District
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FAXED: JANUARY 4, 2007

January 4, 2007

Ms. Susan A. Meyer
U.S. Army Corps of Engineer
Regulatory Branch CESPL-CO-R
P. O. Box 532711
915 Wilshire Boulevard, 11th Floor
Los Angeles, CA 90017

Dear Ms. Meyer:

Draft Environmental Impact Statement/Report (DEIS/R) for the Proposed BNSF Cajon Third Main Track Summit to Keenbrook (November 2006)

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Statement/Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Statement/Report. The SCAQMD would be available 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

SBC061109-01
Control Number

Draft Environmental Impact Statement/Report (DEIS/R) for the Proposed BNSF Cajon Third Main Track Summit to Keenbrook

Operational Emissions Significance: Tables ES-1 and ES-3 in the Air Quality Impact Analysis show that compared with the No Action Option, the NO_X emissions reductions from the proposed project would range from 820.65 pounds per day for 2007 to 613.57 pounds per day for 2010. There are also savings for VOC and PM_{10} for the same period though not by the same margins.

However, despite these emissions reductions from the proposed 3MT project, it is not quite true for the lead agency to claim on page 4-10 of the Air Quality Impact Analysis that the operational emissions from the proposed project will not exceed the significance thresholds when compared with the No-Action Option for 2007, 2010 and 2025. Please note that the determination of a project's air quality impact significance should be based solely on the impacts generated by the project, compared to explicitly stated significance criteria. According to Tables ES-1 and ES-3 on pages ES-5 and ES-6 of the Air Quality Impact Analysis, operational emissions per day for NO_X for 2007 and 2010 are 670.3 pounds and 435.88 pounds respectively and these clearly exceed the SCAQMD recommended significance threshold of 55 pounds per day by wide margins. The fact that the operational emissions are reduced when the Action Option is compared to the No Action Option does not necessarily make the emissions from the Action alternative less than significant. So please delete that statement from the text since it is misleading.

Inconsistencies in Air Quality Data: There are inconsistencies between the main text in the DEIS/R and the Air Quality Impact Analysis. For example, there is a difference of 500 trucks per day currently moving freight through the Cajon Pass on Interstate-15. According to page 3.20 of the DEIS/R there are 19,600 trucks involved while on page ES-2 of the Air Quality Impact Analysis, 20,100 trucks per day are involved in the movement of freight through the same transportation corridor. Please correct this inconsistency in the Final EIS/R.

A second inconsistency relates to the construction emissions for site grading, infrastructure construction and track installation in Tables 4-1 and 4-9 on pages 4-4 and 4-10 of the Air Quality Impact Analysis. It is not clear what conversion factor was used to convert the estimates from annual tonnage to daily poundage. Please provide this information in the Final EIS/R.

No Action Option Truck Traffic: SCAQMD staff disagrees with the methodology used to estimate truck traffic, and therefore, with the truck emissions estimates under the No Action Option. On page 3-13 of the Air Quality Impact Analysis the lead agency states that 60 percent of the equivalent of 51 freight trains, i.e., 7,650 trucks would be needed to transport the extra freight on Interstate-15 through the Cajon Pass. SCAQMD staff believes that this approach underestimates the number of trucks that would be needed to transport the extra freight.

Under the No Action Option, only routine maintenance would be done on the existing two BNSF rail tracks in the project area. No extra capacity would be added to the existing tracks under the No Action Option. This means that any increase in freight from future growth that needs to pass through the Cajon pass would have to go through Interstate-15 by truck. In other words, under the No Action Option, an additional 12,750 trucks (250 X 51) not 7,650 trucks, would be needed to carry the extra freight through the Cajon Pass. By using only 60 percent or 7,650 trucks to estimate project emissions, the lead agency has grossly underestimated truck emissions under the No Action Option.

The lead agency justifies the use of the 60 percent by saying that the 60 percent, a conservative estimate, reflects "trucking operations that may consider alternative routes from Southern California." This statement contradicts the lead agency's own prior statement on page 3-13 of the Air Quality Impact Analysis that "The only alternative transportation option for freight being moved through the Cajon Pass via rail is the I-15."

Please revise the truck estimates in light of the above comments.

Overlapping Construction and Operational Emissions: On page 3-10 of the Air Quality Impact Analysis, it is stated that construction of the new track will be occurring with minimal disruptions to existing train operations. This means that there will be overlaps in project emissions during construction. Tables 4-1, 4-3 and 4-5 on pages 4-4 through 4-8 of the Air Quality Impact Analysis do not reflect this overlap between construction and operational emissions. This means that the proposed project's peak emissions have been underestimated. Please revise the estimates for the Final EIS/R.

Construction Equipment: The lead agency proposes to have project proponent use diesel-fueled construction equipment, see page 3-10 of the Air Quality Impact Analysis. Please note that since NO_X construction emissions exceed the significance threshold, the lead agency would have to reconsider this and have the project proponent use alternatively-fueled construction equipment. See section on Construction NO_X Mitigation below.

Locomotives Idling: On page 3-10 it is stated that the locomotives would be idling for four hours during unloading of material. Please note that locomotive idling is subject to SCAQMD Rule 3502 – Minimization of Emissions from Locomotive Idling, and the project proponent would be required to comply with the requirements of that rule.

Data Source: In the footnote to Table 3.3-1 of the DEIS/R: Baseline and Future Baseline, the source of the 2005 freight tonnage is acknowledged. However, the lead agency does not explain where the 11,946 trucks shown for 2007 (with Project) came from. There is an asterisk on the truck estimate but the footnotes do not show the source. Please indicate the source of this estimate in the Final EIS/R.

Mitigation for Construction NO_X emissions: In addition to the mitigation measures listed on page 5-1 of the Air Quality Impact Analysis, the lead agency should also consider the following measures to further reduce NO_X emissions:

- Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications.
- For all construction equipment, require the use of alternative clean fuel such as electric or compressed natural gas-powered equipment with oxidation catalysts and particulate traps instead of gasoline- or diesel-powered engines. Diesel-powered equipment that has been retrofitted with after-treatment products reduces NO_X by 40 percent. However, where diesel equipment has to be used because there are no practical alternatives, require the use of particulate filters and oxidation catalysts.
- Trucks supplying materials and supplies to the project site should be required to use alternative fuels such as compressed natural gas or fitted with oxidation catalysts or particulate traps.
- Use electricity from power poles instead of temporary diesel- or gasoline-powered generators.
- Prohibit heavy-duty construction vehicles from idling in excess of five minutes, both on- and off-site, to be consistent with state law.

Mitigation for Operational NO_X Emissions: Tables ES-1, ES-3 and ES-5 of the Air Quality Impact Analysis show progressively declining NO_X emissions through 2025. The 2025 NO_X emissions, though much smaller than for 2007 and 2010, still exceed the significance threshold. The lead agency does not make any recommendations for further reducing the NO_X emissions except to say on page 3-18 of the Air Quality Impact Assessment that U.S. Environmental Protection Agency's future Tier 3 standards for locomotives are expected to reduce NO_X and PM emission levels in the exhaust leaving the engine by about 90 percent. Mitigation measures to reduce locomotive emissions are soon to be published on the SCAQMD website. Please periodically visit the following link: http://www.aqmd.gov/ceqa/handbook/mitigation/MM-intro.html for updates.

Baseline Emissions (Editorial): Table 3.3-4: Opening Year Baseline Emissions by Air Basin on pages 3-20 and 3-21 of the DEIS/R shows two different sets of emissions for Loco Idling for the South Coast Air Basin. The second part of the table on page 3-21 should be MDAB-Baseline instead of SCAQMD-Baseline. Please correct this in the Final EIS/R.