



# South Coast Air Quality Management District

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SENT VIA EMAIL AND USPS

June 29, 2018

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Caltrans District 8

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## **Draft Supplemental Environmental Assessment (EA) for the Proposed Mount Vernon Avenue Bridge Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above referenced document. The Draft Supplemental EA analyzes potential environmental impacts under the National Environmental Protection Act (NEPA) for replacement of the Mount Vernon Bridge over the BNSF intermodal rail yard. This NEPA document includes analysis of additional project refinements that were not included in the 2011 EA and Finding of No Significant Impact from a previous version of the project.

SCAQMD staff recognizes the importance of ensuring that the Mount Vernon bridge "is structurally safe, meeting current seismic, design, and roadway standards" as described in the Project Purpose of the Draft Supplemental EA. This comment letter addresses how this project could potentially affect operations at the BNSF rail yard beneath it, in particular with regards to air quality.

By way of background, the BNSF rail yard has been discussed in several other forums as a key facility in the San Bernardino area that can affect air quality. For example, in 2008 the California Air Resources Board (CARB) prepared an air quality Health Risk Assessment<sup>1</sup> that found that the facility posed a cancer risk of about 2,500 chances per million to nearby residents based on a 2005 emissions profile. In 2010, the SCAQMD initiated its Clean Communities Plan<sup>2</sup> that included San Bernardino of one of its two Pilot Study areas, in part because of air quality concerns related to the BNSF rail yard. Finally, under AB 617 passed in 2017, CARB must annually identify communities where local air districts are required to prepare and implement Community Emission Reduction Plans and/or Community Air Monitoring Plans. SCAQMD staff recently released its draft recommendation of four communities that CARB

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<sup>1</sup> <https://www.arb.ca.gov/railyard/hra/hra.htm>

<sup>2</sup> <http://www.aqmd.gov/home/air-quality/clean-air-plans/clean-communities-plan>

should consider<sup>3</sup>. One of these communities includes portions of San Bernardino, in part because of air quality concerns about the BNSF rail yard.

### **New Rail Lines**

The 2011 EA and FONSI described two temporary shoofly tracks that would be installed at the rail yard as part of the project “to maintain railroad operations during construction of the new bridge”. However, the Draft Supplemental EA states that one of these temporary tracks would now become a permanent track (Track 218) and another new permanent track will be built (Track 219). It is not clear from the maps provided in the Draft Supplemental EA how tracks 218 and 219 relate to what appears to be a separate new track (Track 217?) that is visible in a 2018 aerial photo and not in a 2016 aerial photo (see figures on last page).

The rationale for installing these two or three new permanent rail lines is not clear in the Draft Supplemental EA, or how they could potentially impact air quality. If these two or three new tracks add extra capacity to the rail yard, then there could be greater throughput of diesel locomotives and trucks, and greater activity of diesel cargo handling and other equipment, all potentially contributing to regional and localized air quality impacts.

SCAQMD staff recommends that the Final Supplemental EA describe the purpose of these two or three new rail lines, how they could be reasonably anticipated to affect the capacity of this intermodal rail yard, and how they could affect air quality.

### **New Bridge Design**

During the development of the SCAQMD Clean Communities Plan, a concept that was explored was to install lower emission or zero emission gantry cranes. One impediment that was raised was that the design of the Mount Vernon Bridge precluded the installation of this new equipment. As bridge construction is costly and not expected to occur again for many decades after this project, the design of this bridge could affect the potential future installation of emission reducing technologies at this rail yard. SCAQMD staff recommends that the Final Supplemental EA include a discussion of how the proposed bridge design could affect the installation of lower emission or zero emission gantry cranes.

### **New Paved Right of Way Area South of Kingman Street**

The revised project described in the Draft Supplemental EA includes relocating a relatively large part of the intermodal operations from east of the bridge to a newly acquired area in between Kingman Street and 4<sup>th</sup> Street, west of the bridge. This shifting of operations has the potential to bring emission sources closer to sensitive land uses, and potentially could increase localized air quality and health risk impacts. SCAQMD staff recommends that the Final Supplemental EA include a more thorough analysis of this proposed change, and how it could affect air quality.

### **CEQA Analysis and Project Conformity**

The Draft Supplemental EA states that the project is statutorily exempt from CEQA because it is a railroad/road grade separation project. There are a number of additional elements to this project, including the addition of new permanent rail lines (that potentially also increase rail yard

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<sup>3</sup> <http://www.aqmd.gov/docs/default-source/Agendas/ssc/ssc-agenda-6-15-18.pdf> - Item #3

capacity) and the acquisition of new right of way and subsequent relocation of rail yard intermodal operations that may not be covered by this statutory exemption. These additional elements of the project indicate that diesel vehicles that congregate at a rail terminal could be directly affected by this project, and that regional rail and goods movement activity could be affected by the project. These criteria may affect regional and project-level transportation conformity analyses. SCAQMD staff therefore recommends that the Final Supplemental EA include a more thorough discussion how this revised project is exempt from CEQA and how this project meets Transportation Conformity requirements.

**Conclusion**

Staff is also available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [mkrause@aqmd.gov](mailto:mkrause@aqmd.gov), or via phone at (909) 396-2706 if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Michael Krause". The signature is fluid and cursive, with a long horizontal line extending to the right.

Michael Krause  
Planning & Rules Manager  
CEQA Section  
Planning, Rule Development & Area Sources

PF:SR:IMM

SBC180605-07  
Control Number

