



October 13, 2011

BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

Thomas J. Umberg
Chairman of the Board of Directors
California High-Speed Rail Authority
770 L Street, Suite 800
Sacramento, CA 95814

ALAMEDA COUNTY
Tom Bates
(Chairperson)
Scott Haggerty
Jennifer Hosterman
Nate Miley

Subject: California High-Speed Train Project Draft EIR/EIS: (1) Merced to Fresno Section and (2) Fresno to Bakersfield Section

CONTRA COSTA COUNTY
John Gioia
(Vice-Chair)
David Hudson
Mark Ross
Gayle B. Uilkema

Dear Mr. Umberg:

MARIN COUNTY
Harold C. Brown, Jr.

Bay Area Air Quality Management District (District) staff reviewed your agency's Draft Environmental Impact Reports/Statements (DEIRs) for the California High-Speed Train Project (1) Merced to Fresno Section and (2) Fresno to Bakersfield Section (Project). The California High-Speed Train (HST) system will provide intercity, high-speed service on more than 800 miles of tracks throughout California, connecting the major population centers of Sacramento, the San Francisco Bay Area, the Central Valley, Los Angeles, the Inland Empire, Orange County and San Diego. The HST system will be an electrically powered system with trains capable of operating up to 220 miles per hours.

NAPA COUNTY
Brad Wagenknecht

District staff has the following comments on the adequacy of the air quality analysis in the DEIRs.

SAN FRANCISCO COUNTY
John Avalos
Eric Mar
Edwin M. Lee

SAN MATEO COUNTY
Carol Klatt
Carole Groom

NOx Emissions in the Bay Area from Material Hauling

SANTA CLARA COUNTY
Susan Garner
Ash Kalra
(Secretary)
Liz Kniss
Ken Yeager

According to both DEIRs, material hauling during the construction phase would result in oxides of nitrogen (NOx) emissions that would exceed the CEQA significance thresholds in the Bay Area Air Quality Management District (District). The actual levels of emissions anticipated to occur in the San Francisco Bay Area Air Basin (SFBAAB) is uncertain due to the programmatic level of analysis provided in the DEIRs, in part due to the uncertainty in the location of aggregate and other building materials that would be used in the construction activity. District staff agrees with the characterization of the construction impacts as significant, but not the conclusion that this impact remains significant because the District does not have an offset program for mobile sources (p. 3.3-72 in both DEIRs). There is insufficient analysis in the DEIRs regarding the availability and feasibility of potential mitigation measures to support this conclusion. For example, the Project could implement an off-site mitigation program that works very similarly to an "offset program for mobile sources" as referenced in the DEIRs.

SOLANO COUNTY
James Sperring

SONOMA COUNTY
Susan Gorin
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

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The offsite mitigation program would ensure that the Project does not adversely affect the region's ability to attain national and state ambient air quality standards. Mitigation measure AQ- MM#9 in both DEIRs should be expanded to include the following feasible mitigation measure identified by staff:

The Project shall implement an off-site mitigation program to achieve criteria pollutant (NO_x, ROG, PM) emission reductions due to material hauling in the SFBAAB equal to the amount of emissions above the District's significance threshold. In lieu of the California High-Speed Rail Authority (Authority) implementing its own off-site mitigation program, the Authority could off-set their emissions through the District's Carl Moyer Memorial Air Quality Standards Attainment Program (CMP) or other Air District emission reduction incentive programs. The Authority would provide funding for the emission reduction projects in an amount up to the emission reduction project cost-effectiveness limit set by the California Air Resources Board (ARB) for the CMP during the year that the emissions from material hauling are emitted. (The current emissions limit is \$16,640/weighted ton of criteria pollutants [NO_x + ROG + (20*PM)]). An administrative fee of 5% would be paid by the Authority to the District to implement the program. The funding would be used to fund projects eligible for funding under the CMP guidelines or other District incentive programs meeting the same cost-effectiveness threshold that are real, surplus, quantifiable, and enforceable.

District staff is available to assist the Authority in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Environmental Planner, at (415) 749-5169.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: District Board of Directors