



June 9, 2016

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

Mr. Mark McLoughlin, Director of Environmental Services
Att: San Francisco to San Jose Project Section
California High-Speed Rail Authority
100 Paseo Avenue, Suite 206
San Jose, CA 95113

SUBJECT: San Francisco to San Jose Section EIR/EIS - Notice of Preparation

Dear Mr. McLoughlin:

The Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the updated Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for the San Francisco to San Jose Section of the California High-Speed Rail (HSR), Blended System Project (Project). The NOP indicates that the proposed Project will involve construction of a HSR system that could cause regional & local air quality impacts in the San Francisco Bay Area Air Basin. Air District staff recommends the DEIR/EIS include the following information:

1. Provide background information on the Bay Area's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines. A discussion of the health effects of air pollution; and a discussion of greenhouse gas emissions and the potential impacts from climate change in the Bay Area should be provided.
2. If any aspects of the Project, for example, back-up diesel generators, require a permit from the Air District, then the Air District may be a responsible agency for California Environmental Quality Act (CEQA) purposes. The Project must obtain the appropriate permits from the Air District. Please contact Barry Young, Senior Advanced Projects Advisor at (415) 749- 4721 or byoung@baaqmd.gov to discuss permit requirements.
3. Quantify the Project's potential construction and operational impacts on local and regional air quality. The Air District's *Air Quality Guidelines (May, 2012)* provide guidance on how to evaluate a project's or plan's construction, operational and cumulative air quality impacts. You may download a copy from the Air District's web site at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEAQ-GUIDELINES.aspx>.

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4. Estimate and evaluate the potential health risk to existing and future sensitive populations within the Project area from toxic air contaminants (TAC) and fine particulate matter (PM 2.5) as a result of the project's construction and operation. Air District staff recommends that the DEIR/EIS evaluate potential cumulative health risk impacts of TAC emissions on nearby sensitive receptors near stations in proximity to the Project area.
 5. Evaluate all feasible mitigation measures for all potentially significant air quality impacts identified in the DEIR/EIS including but not limited to:
 - Require the use of highest Tier (e.g. Tier 4) construction equipment available.
 - Require the use of biodiesel or other alternative fuels in diesel generators, construction equipment, and/or off-road vehicles.
 - Require all equipment be properly tuned and maintained.
 - Minimize the idling time of diesel powered construction equipment to two minutes.
 - All Basic Construction Mitigation Measures in Table 8-1 on Page 8.3 in the Air District's *CEQA Air Quality Guidelines*.
 6. Evaluate the Project's consistency with the Air District's *2010 Clean Air Plan*, which may be found on the Air District's website, <http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans.aspx>.
 7. The Air District's CEQA website contains a number of tools and resources to assist lead agencies in analyzing air quality impacts. These include guidance on quantifying risk and hazard impacts. View and download available tools here: <http://www.baaqmd.gov/Divisions/Planning-andResearch/CEQA-GUIDELINES/Tools-and-Methodology.aspx>.
 8. Include all appendices or technical documents relating to the air quality, toxic air contaminant and GHG analysis, such as emissions calculation and health risk assessment files in the DEIR/EIS. Without all the supporting air quality documentation, Air District staff may be unable to review the air quality analysis in a timely manner.

We encourage lead agencies to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Andrea Gordon, Senior Environmental Planner, at (415) 749-4940, or agordon@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Executive Officer

cc: BAAQMD Director John Avalos
BAAQMD Director David Canepa
BAAQMD Director Cindy Chavez
BAAQMD Director Carole Groom
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