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January 22, 2021

Michael Tree
Tri-Valley—San Joaquin Regional Rail Authority
1362 Rutan Court #100
Livermore, CA 94551

RE: Valley Link Rail Project – Draft Environmental Impact Report

Dear Mr. Tree,

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Environmental Impact Report (DEIR) for the Tri-Valley—San Joaquin Regional Rail Authority (Authority) Valley Link Rail Project (Project). The Project proposes to establish new passenger rail service along a 42-mile corridor between the cities of Dublin/Pleasanton and the City of Lathrop. The Project would entail new track, new stations (Dublin/Pleasanton, Isabel, Greenville, Mountain House, Downtown Tracy, River Islands, and North Lathrop), and a new Operations and Maintenance Facility in the City of Tracy.

Air District staff supports the goals of the Project which will provide an alternative to driving for more than 93,000 Bay Area workers, reduce 99.4 million vehicle miles traveled per year, and reduce air pollutant emissions and an annual estimated 32,220 to 42,650 metric tons of greenhouse gases (GHGs), all of which help support the Air District's 2017 Clean Air Plan air quality and GHG reduction targets.

To further benefit air quality, maximize climate benefit, and ensure long-term viability as California phases out the use of fossil fuels, Air District staff strongly encourages the Authority to commit to using electric vehicles for its rail passenger service. This would help accomplish the long-range climate vision for the Bay Area to maximize the use of carbon-free energy. It would also help achieve the State's goal to achieve carbon neutrality by 2045 under Executive Order B-55-18.

In addition, staff greatly appreciates the opportunity to work with the Authority to address the potentially significant air quality impacts anticipated to result from this Project. Although the Project identifies design features and mitigation measures in the DEIR that would substantially lessen local and regional air quality emissions, the Project is expected to have significant air quality impacts. The Air District recommends the following measures that can further reduce air pollution emissions and limit exposure to pollutants.

Reduce Construction Emissions

The DEIR anticipates that Project construction-related nitrogen oxides (NOx) emissions will lead to significant impacts after incorporating all best available on-site control measures. The DEIR states that the impact would be reduced to less than significant by funding off-site emissions reduction projects in San Francisco Bay Area Air Basin (MM AQ-2.6).

The Air District strongly supports the implementation of all available on-site emission reduction measures before relying on off-site mitigation measures. As Project construction is scheduled for years 2022 through 2024, the Air District believes that additional on-site emission reduction measures are possible through equipment improvements that will be available during Project construction or by incorporating a less intensive and overlapping buildout schedule.

Air District staff appreciates the Projects' efforts to address air quality and health impacts by incorporating construction best management practices. Beyond the proposed mitigation measures (MM AQ2.1, AQ-2.2 and AQ-2.5) to control fugitive dust, engine idling, and emissions controls for off-road equipment, Air District staff recommends the Project incorporate zero-emissions off-road equipment whenever feasible. Staff also recommends establishing a hotline, posting signs around the site with the hotline number, and ensuring the number is given to all nearby residents, schools and businesses to call and report visible dust problems so the Authority can promptly fix such problems. This would help reduce the detrimental health impacts from particulate matter to nearby residents during the approximate three years of construction.

Prohibit Use of Diesel Generators During Construction and Operations

If diesel generators will be used during construction or operations, Air District staff recommends the Project use grid power whenever possible rather than relying on portable or back-up diesel generators. If grid power is not available, staff recommends the Authority require the use of alternatives to diesel power such as battery storage, hydrogen fuel cells, or renewable fuels.

Enhance Health Risk Assessment Methodology

Air District staff recommends the DEIR list all emission sources identified in the Project's health risk assessment that contribute to cumulative health risks. This list should disclose the specific sources of toxic air contaminants and fine particulate matter (PM_{2.5}) from the Project, nearby permitted facilities, and mobile sources.

Ensure Compliance with Air District Regulations and Permitting Requirements

The Project may require compliance with Air District Regulation 6, Rule 6: Prohibition of Trackout for construction sites where the total land area covered by construction activities and/or disturbed surfaces at the site are one acre or larger. Due to the long, linear nature of the Project, the DEIR should discuss Regulation 6, Rule 6 as it applies to the Project. To review the regulation, please visit <https://www.baaqmd.gov/rules-and-compliance/rules/regulation-6-rule-6-prohibition-of-trackout> and consult with staff from the Air District's Compliance and Enforcement Division at (415) 749-4795 or compliance@baaqmd.gov.

The Project may also require permits (Authority to Construct/Permit to Operate) from the Air District for emergency standby generators. If the Project includes an automatic train control system that requires communication towers, the Authority should discuss with Air District staff any additional equipment that may require permits. If you have any questions regarding the Air District's permits, please contact Barry Young, Senior Advanced Projects Advisor, at byoung@baaqmd.gov or (415) 940-9641 to discuss permit requirements.

We encourage the Authority 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, or would like to schedule a meeting, please contact Areana Flores, Environmental Planner, at (415) 749-4616, or aflores@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Secretary John J. Bauters
BAAQMD Director Pauline Russo Cutter
BAAQMD Director Nate Miley