

## 3.3 Air Quality and Global Climate Change

### 3.3.1 Introduction

This section describes the regulatory and environmental setting associated with the air quality and global climate changes for the study area affected by the HST Project, the potential impacts on air quality and global climate change that would result from the project, and mitigation measures that would eliminate or reduce these impacts. Emission reduction measures identified in the 2005 Statewide Program EIR/EIS (Authority and FRA 2005) are incorporated for the Merced to Fresno Section as described in Section 3.3.9, Mitigation Measures.

The 2005 Statewide Program EIR/EIS (Authority and FRA 2005) concluded that the HST Project would have low potential to result in significant impacts on air quality. The HST would reduce vehicle miles otherwise traveled and result in an air quality benefit when viewed on a systemwide and regional basis. The HST alternatives incorporate, to the extent possible, design measures, such as state-of-the-art, energy-efficient equipment and renewable energy sources, to minimize potential air pollution impacts associated with power used by the HST System.

The *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a) provides more detailed air quality and global climate change information. Sections 3.18 and 3.19 of this Project EIR/EIS discuss growth-inducing impacts and cumulative impacts, respectively.

### 3.3.2 Laws, Regulations, and Orders

#### 3.3.2.1 Federal

The U.S. Environmental Protection Agency (EPA) is responsible for establishing the National Ambient Air Quality Standards (NAAQS), enforcing the Clean Air Act (CAA), and regulating transportation-related emission sources, such as aircraft, ships, and certain types of locomotives, under the exclusive authority of the federal government. The EPA also establishes vehicular emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by the California Air Resources Board (CARB).

#### Clean Air Act and Conformity Rule

The CAA defines nonattainment areas as geographic regions designated as not meeting one or more of the NAAQS. It requires that a state implementation plan (SIP) be prepared for each nonattainment area, and a maintenance plan be prepared for each former nonattainment area that subsequently demonstrated compliance with the standards. A SIP is a compilation of a state's air quality control plans and rules, approved by EPA. Section 176(c) of the CAA provides that federal agencies cannot engage, support, or provide financial assistance for licensing, permitting, or approving any project unless the project conforms to the applicable SIP. The state and U.S. EPAs' goals are to eliminate or reduce the severity and number of violations of the NAAQS and to achieve expeditious attainment of these standards.

Pursuant to CAA Section 176(c) requirements, EPA promulgated Title 40 of the Code of Federal Regulations Part 51 (40 CFR 51) Subpart W and 40 CFR Part 93, Subpart B, "Determining Conformity of General Federal Actions to State or Federal Implementation Plans" (see 58 Federal Register [FR] 63214, [November 30, 1993], as amended, 75 FR 17253 [April 5, 2010]). These regulations, commonly referred to as the General Conformity Rule, apply to all federal actions including those by FRA, except for those federal actions which are excluded from review (e.g., stationary source emissions) or related to transportation plans, programs, and projects under Title 23 U.S. Code or the Federal Transit Act, which are subject to Transportation Conformity.

40 CFR Part 51, Subpart W, applies in states where the state has an approved SIP revision adopting General Conformity regulations; 40 CFR Part 93, Subpart B, applies in states where the state does not have an approved SIP revision adopting General Conformity regulations.

The General Conformity Rule is used to determine if federal actions meet the requirements of the CAA and the applicable SIP by ensuring that air emissions related to the action do not:

- Cause or contribute to new violations of a NAAQS.
- Increase the frequency or severity of any existing violation of a NAAQS.
- Delay timely attainment of a NAAQS or interim emission reduction.

A conformity determination under the General Conformity Rule is required if the federal agency determines: the action will occur in a nonattainment or maintenance area; that one or more specific exemptions do not apply to the action; the action is not included in the federal agency's "presumed to conform" list; the emissions from the proposed action are not within the approved emissions budget for an applicable facility; and the total direct and indirect emissions of a pollutant (or its precursors), are at or above the *de minimis* levels established in the General Conformity regulations (75 FR 17255).

Conformity regulatory criteria are listed in 40 CFR 93.158. An action will be determined to conform to the applicable SIP if, for each pollutant that exceeds the *de minimis* emissions level in 40 CFR 93.153(b), or otherwise requires a conformity determination due to the total of direct and indirect emissions from the action, the action meets the requirements of 40 CFR 93.158(c).

In addition, federal activities may not cause or contribute to new violations of air quality standards, exacerbate existing violations, or interfere with timely attainment or required interim emissions reductions toward attainment. The proposed project is subject to review under the EPA General Conformity Rule. However, there may be some smaller highway elements of the project that will be dealt with through case-by-case modification of the Regional Transportation Plan (RTP) consistent with transportation conformity.

### **National and State Ambient Air Quality Standards**

As required by the CAA, EPA has established NAAQS for six major air pollutants. These pollutants, known as criteria pollutants, are ozone (O<sub>3</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), and lead. California has also established ambient air quality standards, known as the California Ambient Air Quality Standards (CAAQS), which are generally more stringent than the corresponding federal standards, and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility reducing particles.

Table 3.3-1 summarizes state and federal standards. The primary standards have been established to protect public health. The secondary standards are intended to protect the nation's welfare and account for air pollutant impacts on soil, water, visibility, materials, vegetation, and other aspects of the general welfare.

### **Mobile Source Air Toxics**

In addition to the criteria pollutants for which there are NAAQS, EPA regulates mobile source air toxics (MSATs). In February 2007, EPA finalized a rule (Control of Hazardous Air Pollutants from Mobile Sources, February 9, 2007) to reduce hazardous air pollutants from mobile sources. The rule limits the benzene content of gasoline and reduces toxic emissions from passenger vehicles and gas cans. EPA estimates that in 2030 this rule would reduce total emissions of MSATs by 330,000 tons and volatile organic compound (VOC) emissions (precursors to O<sub>3</sub> and PM<sub>2.5</sub>) by more than 1 million tons. The latest revision to this rule occurred in October 2008. This revision added specific benzene control technologies that the previous rule did not include. No federal or California ambient standards exist for MSATs. Specifically, EPA has not established NAAQS or provided standards for hazardous air pollutants.

**Table 3.3-1**  
 State and Federal Ambient Air Quality Standards

<b>Ambient Air Quality Standards</b>						
Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Ozone (O <sub>3</sub> )	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )		0.075 ppm (147 µg/m <sup>3</sup> )		
Respirable Particulate Matter (PM <sub>10</sub> )	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		—		
Fine Particulate Matter (PM <sub>2.5</sub> )	24 Hour	—	—	35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	15 µg/m <sup>3</sup>		
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m <sup>3</sup> )	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		—	—	
Nitrogen Dioxide (NO <sub>2</sub> ) <sup>8</sup>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemiluminescence	100 ppb (188 µg/m <sup>3</sup> )	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		53 ppb (100 µg/m <sup>3</sup> )	Same as Primary Standard	
Sulfur Dioxide (SO <sub>2</sub> ) <sup>9</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>9</sup>	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) <sup>9</sup>	—	
Lead <sup>10,11</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m <sup>3</sup> (for certain areas) <sup>11</sup>	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m <sup>3</sup>		
Visibility Reducing Particles <sup>12</sup>	8 Hour	See footnote 12	Beta Attenuation and Transmittance through Filter Tape	<b>No National Standards</b>		
Sulfates	24 Hour	25 µg/m <sup>3</sup>	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride <sup>10</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chromatography			

See footnotes on next page ...

For more information please call ARB-PIO at (916) 322-2990

California Air Resources Board (2/7/12)

**Table 3.3-1**  
**State and Federal Ambient Air Quality Standards (Continued)**

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above  $150 \mu\text{g}/\text{m}^3$  is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standards of 53 ppb and 100 ppb are identical to 0.053 ppm and 0.100 ppm, respectively.
9. On June 2, 2010, a new 1-hour SO<sub>2</sub> standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO<sub>2</sub> national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.  
  
 Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
10. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
11. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard ( $1.5 \mu\text{g}/\text{m}^3$  as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
12. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

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California Air Resources Board (2/7/12)

Source: CARB (2012).

### **Greenhouse Gas Regulations**

Greenhouse gas (GHG) emissions are regulated at the federal and state level. Laws and regulations, as well as plans and policies, have been adopted to address global climate change issues. Key federal regulations relevant to the project are summarized below.

On September 22, 2009, EPA published the Final Rule that requires mandatory reporting of GHG emissions from large sources in the U.S. The gases covered by the Final Rule are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and other fluorinated gases including nitrogen trifluoride (NF<sub>3</sub>) and hydrofluorinated ethers (HFE). This is not a transportation-related regulation.

On October 5, 2009, Federal Executive Order (E.O.) 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, was signed by the White House Council on Environmental Quality (CEQ). The E.O. requires federal agencies to set a 2020 GHG emissions reduction target within 90 days, increase energy efficiency, reduce fleet petroleum consumption, conserve water, reduce waste, support sustainable communities, and leverage federal purchasing power to promote environmentally responsible products and technologies.

On December 7, 2009, the Final Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the CAA was signed. The endangerment finding states that current and projected concentrations of the six key well-mixed GHGs in the atmosphere—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>—threaten the public health and welfare of current and future generations. Furthermore, it states that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution that threatens public health and welfare (EPA 2010a).

Based on the endangerment finding, EPA is revising vehicle emission standards under the CAA. EPA and National Highway Traffic Safety Administration (NHTSA) updated the Corporate Average Fuel Economy (CAFE) fuel standards on May 7, 2010 (75 FR 25324), requiring substantial improvements in fuel economy for all vehicles sold in the United States. The new standards apply to new passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. The EPA GHG standards require these vehicles to meet an estimated combined average emissions level of 250 grams of CO<sub>2</sub> per mile in model year 2016, which would be the equivalent to 35.5 miles per gallon if the automotive industry were to meet this CO<sub>2</sub> level solely through fuel economy improvements.

On September 15, 2011, EPA and NHTSA issued a Final Rule of Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles (76 FR 76 57107). This final rule is tailored to each of three regulatory categories of heavy-duty vehicles: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. EPA and NHTSA estimated that the new standards in this rule will reduce CO<sub>2</sub> emissions by approximately 270 million metric tons (MMT) and save 530 million barrels of oil over the life of vehicles sold during the 2014 through 2018 model years.

On February 18, 2010, CEQ released draft guidance on the consideration of GHG in NEPA documents for federal actions. The draft guidelines include a presumptive threshold of 25,000 metric tons of carbon dioxide equivalent (CO<sub>2</sub>e) emissions from a proposed action to trigger a quantitative analysis. CEQ has not established when GHG emissions are "significant" for NEPA purposes but posed that question to the public (CEQ 2010).

#### **3.3.2.2 State**

##### **California Clean Air Act**

The California Clean Air Act (CCAA) requires nonattainment areas to achieve and maintain the health-based State Ambient Air Quality Standards by the earliest practicable date. The Act is administered by CARB at the state level and by local air quality management districts at the regional level, whereby the air districts are required to develop plans and control programs for attaining the state standards.



CARB is responsible for ensuring implementation of the CCAA, meeting state requirements of the federal CAA, and establishing the CAAQS. It is also responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB also establishes passenger vehicle fuel specifications.

### **Asbestos Control Measures**

CARB has adopted two airborne toxic control measures for controlling naturally occurring asbestos: the Asbestos Airborne Toxic Control Measure for Surfacing Applications and the Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations. Also, EPA is responsible for enforcing regulations relating to asbestos renovations and demolitions; however, EPA can delegate this authority to state and local agencies. CARB and local air districts have been delegated authority to enforce the Federal National Emission Standards for Hazardous Air Pollutants regulations for asbestos.

### **Greenhouse Gas Regulations**

California has taken proactive steps, briefly described below, to address the issues associated with GHG emissions and climate change.

#### ***Assembly Bill 1493***

In 2002, with the passage of Assembly Bill 1493 (AB 1493), California launched an innovative and proactive approach to dealing with GHG emissions and climate change at the state level. AB 1493 requires CARB to develop and implement regulations to reduce automobile and light truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with the model year 2009. Although litigation challenged these regulations and EPA initially denied California's related request for a waiver, the waiver request was granted (EPA 2010b).

#### ***Executive Order S-3-05***

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05. The goal of this executive order is to reduce California's GHG emissions to year 2000 levels by 2010; 1990 levels by 2020; and 80% below the 1990 levels by 2050. Executive Order S-3-05 also calls for Cal-EPA to prepare biennial science reports on the potential impact of continued global warming on certain sectors of the California economy. As a result of the scientific analysis presented in these biennial reports, a comprehensive Climate Adaptation Strategy (CAS) was released in December 2009 following extensive interagency coordination and stakeholder input. The latest of these reports, *Climate Action Team Biennial Report*, was published in December 2010 (Cal-EPA 2010).

#### ***Assembly Bill 32***

In 2006, the goal of Executive Order S-3-05 was further reinforced with the passage of AB 32, the Global Warming Solutions Act of 2006. AB 32 sets overall GHG emissions reduction goals and mandates that CARB create a plan, which includes market mechanisms, and implement rules to achieve "real, quantifiable, cost-effective reductions of GHGs." Executive Order S-20-06 further directs state agencies to begin implementing AB 32, including the recommendations made by the state's Climate Action Team.

Among AB 32's specific requirements are the following:

- CARB will prepare and approve a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020 (Health and Safety Code [HSC] Section 38561). The scoping plan, approved by CARB on December 12, 2008, provides the outline for future actions to reduce GHG emissions in California via regulations, market mechanisms, and other measures.

- The scoping plan includes the implementation of high-speed rail as a GHG reduction measure, estimating a 2020 reduction of 1 million metric tons of CO<sub>2</sub> equivalent (MMT CO<sub>2</sub>e).
- Identify the statewide level of GHG emissions in 1990 to serve as the emissions limit to be achieved by 2020 (HSC Section 38550). In December 2007, CARB approved the 2020 emission limit of 427 MMT CO<sub>2</sub>e of GHG.
- Adopt a regulation requiring the mandatory reporting of GHG emissions (HSC Section 38530). In December 2007, CARB adopted a regulation requiring the largest industrial sources to report and verify their GHG emissions. The reporting regulation serves as a solid foundation to determine GHG emissions and track future changes in emission levels.

### ***Executive Order S-01-07***

With Executive Order S-01-07, Governor Schwarzenegger set forth the low carbon fuel standard for California. Under this executive order, the carbon intensity of California's transportation fuels is to be reduced by at least 10% by 2020.

### ***Senate Bill 375***

SB 375, signed into law by the governor on September 30, 2008, became effective January 1, 2009. This law requires CARB to develop regional reduction targets for GHG emissions, and prompts the creation of regional land use and transportation plans to reduce emissions from passenger vehicle use throughout the state. The targets apply to the regions in the state covered by California's 18 metropolitan planning organizations (MPOs). The 18 MPOs have been tasked with creating the regional land use and transportation plans called "Sustainable Community Strategies" (SCS). The MPOs are required to develop the SCS through integrated land use and transportation planning and demonstrate an ability to attain the proposed reduction targets by 2020 and 2035. This would be accomplished through either the financially constrained sustainable communities' strategy as part of their RTP or an unconstrained alternative planning strategy. If regions develop integrated land use, housing, and transportation plans that meet the SB 375 targets, new projects in these regions can be relieved of certain review requirements of CEQA.

Pursuant to SB 375, CARB appointed a Regional Targets Advisory Committee (RTAC) on January 23, 2009, to provide recommendations on factors to be considered and methodologies to be used in CARB's target setting process. The RTAC was required to provide its recommendations in a report to CARB by September 30, 2009. The report included relevant issues such as data needs, modeling techniques, growth forecasts, jobs-housing balance, interregional travel, various land use/transportation issues affecting GHG emissions, and overall issues relating to setting these targets. CARB adopted the final targets on September 23, 2010. CARB must update the regional targets every 8 years (or 4 years if it so chooses) consistent with each Metropolitan Planning Organization (MPO) update of its RTP.

#### **3.3.2.3 Regional and Local**

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is responsible for implementing air quality regulations, including developing plans and control measures for stationary sources of air pollution to meet the NAAQS and CAAQS; implementing permit programs for the construction, modification, and operation of sources of air pollution; and enforcing air pollution statutes and regulations governing stationary sources. The following regulations that may be relevant to the project, as administered by the SJVAPCD with CARB oversight, were identified and considered for analysis:

- SJVAPCD Rule 2201 New and Modified Stationary Source Review
- SJVAPCD Rule 2280 Portable Equipment Registration
- SJVAPCD Rule 2303 Mobile Source Emission Reduction Credits
- SJVAPCD Rule 4201 and Rule 4202 Particulate Matter Concentration and Emission Rates
- SJVAPCD Rule 4301 Fuel Burning Equipment
- SJVAPCD Rule 8011 General Requirements – Fugitive Dust Emission Sources

- SJVAPCD Rule 9510 Indirect Source Review
- SJVAPCD CEQA Guidelines

Descriptions of Rules 2201, 8011, and 9510 are included in the following sections because these rules may directly affect the measures to be included in the design features or may need to be implemented during the planning stage of this project. Additional descriptions of other rules were discussed in *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA, 2012a).

**SJVAPCD Rule 2201: New and Modified Stationary Source Review**

Stationary sources at the HST stations (such as natural gas heaters) would need to be permitted by the SJVAPCD and would have to comply with best available control technology (BACT) requirements if applicable. Many stationary sources would be associated with HMF activities, such as exterior washing, welding, material storage, cleaning solvents, abrasive blasting, painting, oil/water separation, and wastewater treatment and combustion. Permits would need to be obtained for equipment associated with these activities from the SJVAPCD and would need to comply with applicable new source review rules such as BACT requirements.

**SJVAPCD Rule 8011: General Requirements - Fugitive Dust Control Measures**

According to Rule 8011, the SJVAPCD requires the implementation of control measures for fugitive dust emission sources. The project would also implement the mandatory control measures listed in Table 6-2 in the *Guide for Assessing and Mitigating Air Quality Impacts* (SJVAPCD 2002) to reduce fugitive dust emissions. These measures are not considered mitigation measures because they are required by law but will be required during project construction and implementation as part of project design.

Many of the control measures required by the SJVAPCD are the same or similar to the control measures listed in the 2005 Statewide Program EIR/EIS. The SJVAPCD Rule 8011 requirements are listed below:

- All disturbed areas, including storage piles, that are not being actively used for construction purposes will be effectively stabilized for dust emissions using water or a chemical stabilizer/suppressant, or covered with a tarp or other suitable cover or vegetative ground cover.
- All onsite unpaved roads and offsite unpaved access roads will be effectively stabilized for dust emissions using water or a chemical stabilizer/suppressant.
- All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities will be effectively controlled for fugitive dust emissions by an application of water or by presoaking. With the demolition of buildings up to six stories in height, all exterior surfaces of the buildings will be wetted during demolition.
- All materials transported offsite will be covered or effectively wetted to limit visible dust emissions, and at least 6 inches of freeboard space from the top of the container will be maintained.
- All operations will limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.
- Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, piles will be effectively stabilized for fugitive dust emissions using sufficient water or a chemical stabilizer/suppressant.
- Within urban areas, trackout will be immediately removed when it extends 50 or more feet from the site and at the end of each workday.
- Any site with 150 or more vehicle trips per day will prevent carryout and trackout.





**SJVAPCD Rule 9510: Indirect Source Review**

In December 2005, the SJVAPCD adopted the Indirect Source Rule (Rule 9510) to meet the SJVAPCD's emission reduction commitments in the PM<sub>10</sub> and Ozone attainment plans. Indirect Source Review (ISR) regulation applies to any transportation project in which construction emissions equal or exceed 2 tons of nitrogen oxide (NO<sub>x</sub>) or PM<sub>10</sub> per year. Construction of the HST alignment (specifically, onsite off-road construction exhaust emissions) would be subject to ISR. Accordingly, the Authority would have to submit an Air Impact Assessment (AIA) application to the SJVAPCD with commitments to reduce construction exhaust NO<sub>x</sub> and PM<sub>10</sub> emissions by 20% and 45%, respectively. According to SJVAPCD, if successful, AQ-MM #1 (use of Tier 3 equipment) might, as a practical matter, satisfy these numerical reduction requirements; if not, AQ-MM #4 would satisfy the ISR requirements. Operation of the HST would be exempt under Sections 4.1 and 4.2 of Rule 9510.

**Definition of Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)**

PM<sub>10</sub> refers to particulate matter less than 10 microns in diameter, about one seventh the thickness of a human hair. Particulate matter pollution consists of small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter also forms when gases emitted from motor vehicles undergo chemical reactions in the atmosphere.

PM<sub>2.5</sub> is a subset of PM<sub>10</sub> and refers to particulates that are 2.5 microns or less in diameter, roughly 1/28th the diameter of a human hair.

**3.3.3 Pollutants for Analysis**

Three general classes of air pollutants are of concern for this project: criteria pollutants, toxic air contaminants (TACs), and GHGs. Criteria pollutants are those for which EPA and the State of California have set ambient air quality standards or that are chemical precursors to compounds for which ambient standards have been set. TACs of concern for the proposed project are seven MSATs identified by EPA as having significant contributions from mobile sources: acrolein, benzene, 1,3-butadiene, diesel particulate matter and diesel exhaust organic gases, formaldehyde, naphthalene, and polycyclic organic matter. GHGs are gaseous compounds that limit the transmission of radiated heat from the earth's surface to the atmosphere.

**3.3.3.1 Criteria Pollutants**

For these pollutants, both federal and state ambient air quality standards have been established to protect public health and welfare. The following sections briefly describe each pollutant.

***Ozone***

CARB inventories two classes of hydrocarbons: total organic gases (TOGs) and reactive organic gases (ROGs). ROGs have relatively high photochemical reactivity. The principal nonreactive hydrocarbon is methane, which is also a GHG. The major source of ROG is the incomplete combustion of fossil fuels in internal combustion engines. Other sources of ROG include the evaporative emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products. Adverse impacts on human health are not caused directly by ROG, but rather by reactions of ROG that form secondary pollutants. ROGs are also transformed into organic aerosols in the atmosphere, contributing to higher levels of fine particulate matter and lower visibility. CARB uses the term ROG for air quality analysis, and ROG has the same definition as the federal term VOC. In this analysis, ROG is assumed to be equivalent to VOC.

**Definition of Ozone (O<sub>3</sub>)**

O<sub>3</sub> is a colorless toxic gas found in the earth's upper and lower atmospheric levels. In the upper atmosphere, O<sub>3</sub> is naturally occurring and helps to prevent the sun's harmful ultraviolet rays from reaching the earth. In the lower atmosphere, O<sub>3</sub> is man-made. Although O<sub>3</sub> is not directly emitted, it forms in the lower atmosphere through a chemical reaction between hydrocarbons, also referred to as VOC, and NO<sub>x</sub>, which are emitted from industrial sources and from automobiles.

Substantial O<sub>3</sub> formations generally require a stable atmosphere with strong sunlight; thus, high levels of O<sub>3</sub> are generally a concern in the summer. O<sub>3</sub> is the main ingredient of smog. O<sub>3</sub> enters the bloodstream through the respiratory system and interferes with the transfer of oxygen, depriving sensitive tissues in the heart and brain of oxygen. O<sub>3</sub>

also damages vegetation by inhibiting its growth. This analysis examines the impacts of changes in VOC and NO<sub>x</sub> emissions for the proposed project on a regional and statewide level.

**Particulate Matter**

Particulate pollution is composed of solid particles or liquid droplets small enough to remain suspended in the air. In general, particulate pollution can include dust, soot, and smoke. These can be irritating but usually are not poisonous. Particulate pollution also can include bits of solid or liquid substances that can be highly toxic. Of particular concern are PM<sub>10</sub> and PM<sub>2.5</sub>.

Major sources of PM<sub>10</sub> include motor vehicles; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush and waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Suspended particulates produce haze and reduce visibility. Data collected through nationwide studies indicate that most of the PM<sub>10</sub> comes from fugitive dust, wind erosion, and agricultural and forestry sources.

A small portion of particulate matter is the product of fuel combustion processes. In the case of PM<sub>2.5</sub>, the combustion of fossil fuels accounts for a significant portion of this pollutant. The main health impact of airborne particulate matter is on the respiratory system. PM<sub>2.5</sub> results from fuel combustion (from motor vehicles, power generation, and industrial facilities), residential fireplaces, and wood stoves. In addition, PM<sub>2.5</sub> can form in the atmosphere from gases such as SO<sub>2</sub>, NO<sub>x</sub>, and VOC. Like PM<sub>10</sub>, PM<sub>2.5</sub> can penetrate the human respiratory system's natural defenses and damage the respiratory tract when inhaled. Whereas PM<sub>10</sub> tends to collect in the upper portion of the respiratory system, PM<sub>2.5</sub> can penetrate deeper into the lungs and damage lung tissues. The impacts of PM<sub>10</sub> and PM<sub>2.5</sub> emissions for the project are examined on a localized—or microscale—basis, a regional basis, and a statewide basis.

**Carbon Monoxide**

In cities, 85% to 95% of CO emissions may come from motor-vehicle exhaust. Prolonged exposure to high levels of CO can cause headaches, drowsiness, loss of equilibrium, or heart disease. CO levels are generally highest in the colder months when inversion conditions (when warmer air traps colder air near the ground) are more frequent.

CO concentrations can vary greatly over relatively short distances. Relatively high concentrations of CO typically occur near congested intersections, along heavily used roadways carrying slow-moving traffic, and in areas where atmospheric dispersion is inhibited by urban "street canyon" conditions. Consequently, CO concentrations must be predicted on a microscale basis.

**Definition of Carbon Monoxide (CO)**  
 CO is a colorless gas that interferes with the transfer of oxygen to the brain. CO emits almost exclusively from the incomplete combustion of fossil fuels. On-road motor-vehicle exhaust is the primary source of CO.

**Nitrogen Dioxide**

Nitrogen oxide (NO) and NO<sub>2</sub>, collectively referred to as NO<sub>x</sub>, are major contributors to ozone formation. NO<sub>2</sub> also contributes to the formation of PM<sub>2.5</sub>. At atmospheric concentrations, NO<sub>2</sub> is only potentially irritating. In high concentrations, the result is a brownish-red cast to the atmosphere and reduced visibility. There is some indication of a relationship between NO<sub>2</sub> and chronic pulmonary fibrosis. In addition, an increase in bronchitis in children (2 and 3 years old) has been observed at concentrations below 0.3 parts per million (ppm).

**Definition of Nitrogen Dioxide (NO<sub>2</sub>)**  
 NO<sub>2</sub> is a brownish gas that irritates the lungs. It can cause breathing difficulties at high concentrations. NO<sub>2</sub> is one of a group of highly reactive gasses known as "oxides of nitrogen," or "nitrogen oxides (NO<sub>x</sub>)." As with O<sub>3</sub>, NO<sub>2</sub> can be formed through a reaction between nitric oxide and atmospheric oxygen.

**Lead**

Lead levels from mobile sources in the urban environment have decreased significantly because of the federally mandated switch to lead-free gasoline, and lead levels are expected to continue to decrease. Therefore, an analysis of the impacts of lead emissions from transportation projects is not warranted and not conducted for this project.

**Sulfur Dioxide**

SO<sub>2</sub> can cause acute respiratory symptoms and diminished ventilation in children. SO<sub>2</sub> can also yellow plant leaves and corrode iron and steel. Although diesel-fueled, heavy-duty vehicles emit SO<sub>2</sub>, EPA (and other regulatory agencies) does not consider transportation sources to be significant sources of this pollutant. Therefore, an analysis of the impacts of SO<sub>2</sub> emissions from transportation projects is usually not warranted. However, an analysis of the impacts of SO<sub>2</sub> emissions was conducted for this project.

**3.3.3.2 Toxic Air Contaminants**

California law defines a TAC as an air pollutant that “may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health.” EPA uses the term “hazardous air pollutant” in a similar sense. Controlling air toxic emissions became a national priority with the passage of the CAA, whereby Congress mandated that EPA regulate 188 air toxics, also known as hazardous air pollutants. Toxic air contaminants can be emitted from stationary and mobile sources.

Stationary sources of TACs from HST operations would include use of solvent-based materials (cleaners and coatings) and combustion of fossil fuel in boilers, heaters, and ovens at maintenance facilities. Although the HSTs would not emit TACs, MSATs would be associated with the project chiefly through motor vehicle traffic to and from the HST stations.

For MSATs, EPA has assessed the expansive list in its latest rule on the Control of Hazardous Air Pollutants from Mobile Sources, and identified 93 compounds emitted from mobile sources that are listed in its Integrated Risk Information System. EPA identified seven compounds with significant contributions from mobile sources that are among the national- and regional-scale cancer risk drivers from its 1999 National Air Toxics Assessment. These seven compounds are acrolein, benzene, 1,3-butadiene, diesel particulate matter plus diesel exhaust organic gases (diesel PM), formaldehyde, naphthalene, and polycyclic organic matter. This list, however, is subject to change and may be adjusted in consideration of future EPA rules.

**3.3.3.3 Greenhouse Gases**

GHGs trap heat in the atmosphere, keeping the earth’s surface warmer than it otherwise would be. According to the National Oceanic and Atmospheric Administration (NOAA) and National Aeronautics and Space Administration (NASA) data, the earth's average surface temperature has increased by 1.2 to 1.4°F within the last 100 years. Eleven of the last 12 years rank among the 12 warmest years on record (since 1850), with the warmest 2 years being 1998 and 2005. Most of the warming in recent decades is likely the result of human activities. Other aspects of the climate are also changing, such as rainfall patterns, snow and ice cover, and sea level.

Some GHGs, such as CO<sub>2</sub>, occur naturally and are emitted to the atmosphere through both natural processes and human activities. Other GHGs (e.g., fluorinated gases) are created and emitted solely through human activities. GHGs differ in their ability to trap heat. For example, 1 ton of emissions of CO<sub>2</sub> has a different effect than 1 ton of emissions of methane. To compare emissions of different GHGs, inventory compilers use a weighting factor called a

**Definition of Greenhouse Gases (GHGs)**

GHG is any gas that absorbs infrared radiation in the atmosphere. GHGs include water vapor, CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HCFCs, O<sub>3</sub>, HFCs, PFCs, and SF<sub>6</sub>. GHGs contribute to the global warming trend, a regional and ultimately a worldwide concern. What was once a natural phenomenon of climate has been changing because of human activities, such as an increase in CO<sub>2</sub>.

Global Warming Potential (GWP). To use a GWP, the heat-trapping ability of 1 metric ton (1,000 kilograms) of CO<sub>2</sub> is taken as the standard, and emissions are expressed in terms of CO<sub>2</sub> equivalent, but can also be expressed in terms of carbon equivalent. Therefore, the GWP of CO<sub>2</sub> is 1. The GWP of methane is 21, whereas the GWP of nitrous oxide is 310. The principal GHGs that enter the atmosphere because of human activities include CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HCFCs, HFCs, PFCs, and SF<sub>6</sub>. Because of the global nature of GHG emissions and the nature of the electrical grid system, GHG was examined on a statewide level.

### 3.3.4 Methods for Evaluating Impacts

The methods for evaluating impacts are intended to satisfy the federal and state requirements including NEPA, CEQA and general conformity. In accordance with CEQA requirements, an EIR must include a description of the existing physical environmental conditions in the vicinity of the project. Those conditions, in turn, "will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant" (CEQA Guidelines §15125[a]).

For a project such as the HST Project that would not commence operation of HST service for almost 10 years and would not reach full operation for almost 25 years, use of only existing conditions as a baseline for air quality impacts would be misleading. It is more likely that existing background traffic volumes (and background roadway changes from other programmed traffic improvement projects) and vehicle emission factors would change between today and 2020/2035 than it is that existing conditions would remain unchanged over the next 10 to 25 years. For example, RTPs include funded transportation projects programmed to be constructed by 2035. To ignore that these projects would be in place before the HST Project reaches maturity (i.e., the point/year at which HST-related traffic emissions reaches its maximum), and to evaluate the HST Project's air quality impacts ignoring that these RTP improvements would change the underlying background conditions to which HST Project traffic/emissions would be added, would be misleading because it would represent a hypothetical comparison.

Therefore, the air quality analysis uses a dual baseline approach. That is, the HST Project's air quality impacts are evaluated both against existing background conditions and against future background (i.e., No Project) conditions as they are expected to be in 2035. This approach complies with CEQA. (See *Woodward Park Homeowners Assn. v. City of Fresno* [2007], 150 Cal. App.4th 683, 707, *Sunnyvale West Neighborhood Assn. v. City of Sunnyvale* [2010], 190 Cal. App. 4th 1351, *Madera Oversight Coalition v. County of Madera* [Sept 2011] 199 Cal. App. 4th 48, and *Pfeiffer v. City of Sunnyvale* [Oct 2011] 200 Cal. App.4th 1552.) Results for both baselines are presented. Additional details of the analysis are presented in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

#### 3.3.4.1 Study Areas for Analysis

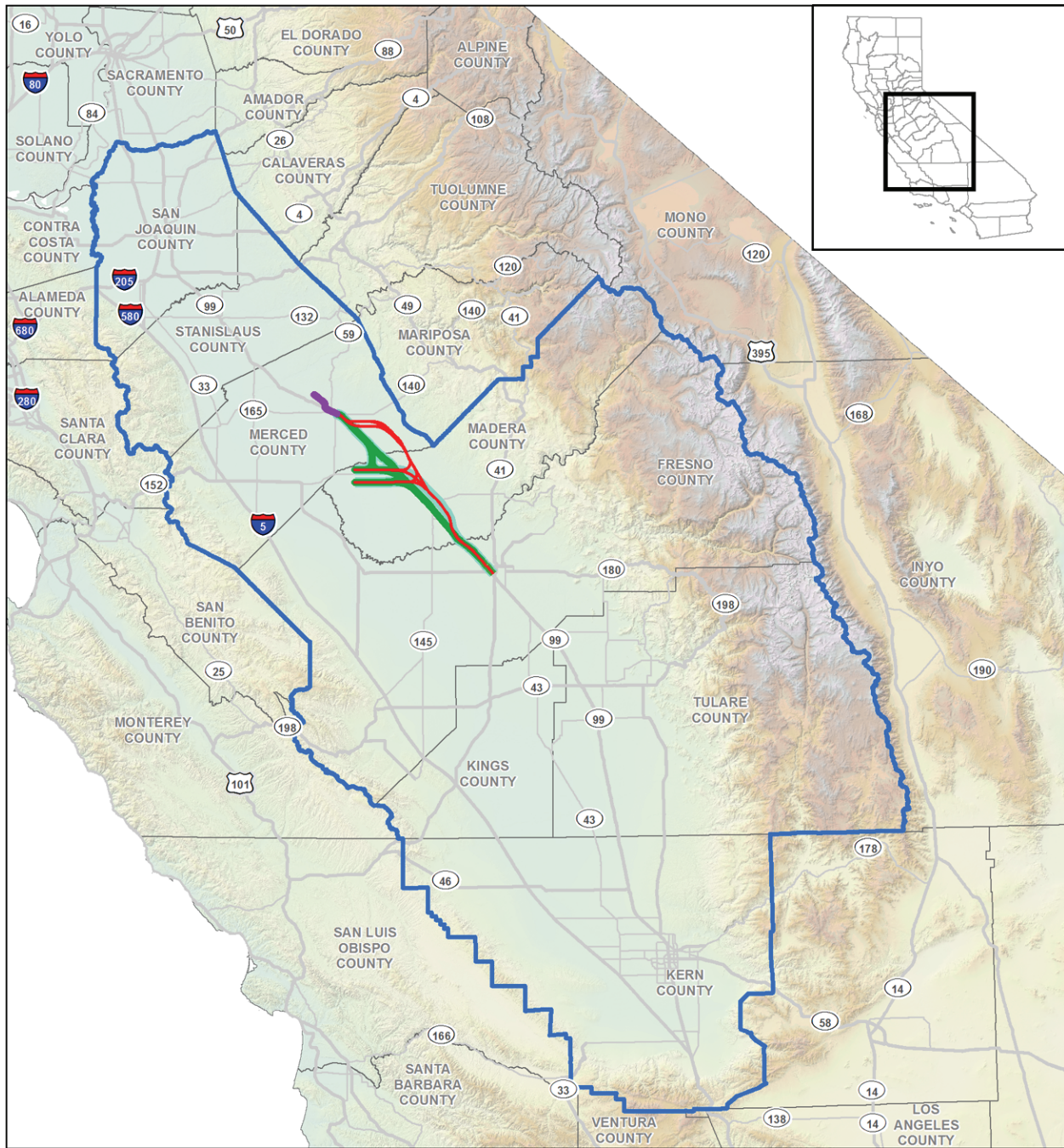
##### Statewide

A statewide study area was identified to evaluate potential changes in air quality from large-scale non-localized impacts such as HST power requirements, changes in air traffic, and project conformance with the SIP.

##### Regional

This section of the HST System would potentially affect regional air pollutant concentrations within the SJVAB, in which the entire Merced to Fresno Section is located. Figure 3.3-1 shows the alignment as it is

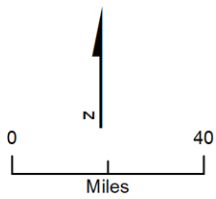




Source: CARB (2004).

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Jun 27, 2011



- UPRR/SR 99 Alternative
- BNSF Alternative
- Hybrid Alternative
- County Boundary
- San Joaquin Valley Air Basin

**Figure 3.3-1**  
 San Joaquin Valley Air Basin



situated in the SJVAB, which includes Madera, Merced, and Fresno counties. The SJVAB, which is approximately 250 miles long and 35 miles wide, is the second-largest air basin in the state. The SJVAB is defined by the Sierra Nevada Mountains in the east (8,000 to 14,000 feet in elevation), the Coast Range in the west (averaging 3,000 feet in elevation), and the Tehachapi Mountains in the south (6,000 to 8,000 feet in elevation). To the north, the valley opens to the sea at the Carquinez Strait, where the Sacramento–San Joaquin River Delta empties into San Francisco Bay.

### **Local**

Local study areas are areas of potential major air emission activities along the project alignment, including areas near large construction activities and major traffic pattern changes. Local study areas are generally defined as areas within 1,000 feet of the proposed stations, major intersections, and HMFs. Analyses performed by CARB indicate that providing a separation of 1,000 feet from diesel sources and high traffic areas would substantially reduce diesel PM concentrations, public exposure, and asthma symptoms in children (CARB 2005). Potential impacts from changes in CO, PM<sub>2.5</sub>, and PM<sub>10</sub> concentrations caused by changes in local traffic conditions were evaluated at sensitive land uses within 1,000 feet of intersections operating at LOS D or worse.

#### **3.3.4.2 Statewide and Regional Emission Calculations**

The emission burden analysis of a project determines a project's overall potential impact on air quality. The proposed project would affect long-distance, city-to-city vehicular travel along freeways and highways throughout the state, as well as long-distance, city-to-city aircraft take-offs and landings. The project would also affect electrical demand throughout the state.

### **On-Road Vehicles**

An on-road vehicle emission analysis was conducted using average daily vehicle miles traveled (VMT) estimates and associated average daily speed estimates, for each affected county. Emission factors were estimated by using the CARB emission factor program, Emission FACTors 2007 (EMFAC2007); see Emissions Model in Section 3.3.4.3, Microscale CO Analysis (CARB 2006a). Parameters were set in the program for each individual county to reflect conditions within each county, and statewide parameters were used to reflect statewide conditions. The analysis was conducted for the future No Project Alternative and the HST alternatives for the project's design year, both of which are 2035; the existing condition (2009); and the existing condition plus project (2009).

To determine the overall pollutant burdens generated by on-road vehicles, the estimated VMT were multiplied by the specific pollutant's emission factors, which were based on speed, vehicle mix, and analysis year. According to the current version of EMFAC2007, future fuel economy factors are forecast to improve only slightly between the years 2008 and 2035. However, this forecast is an artifact of the current version of EMFAC2007, which does not consider recent regulatory actions for improvements in vehicle fuel economy. Although the estimated 2035 on-road emissions would be lower if the recent regulatory actions were incorporated into the emission factors, the overall conclusions of this report (i.e., that the project would result in reductions in vehicle emissions, in addition to the reductions caused by required improved fuel economy) would not change.

### **Airport Emissions**

The Federal Aviation Administration's (FAA's) Emission and Dispersion Modeling System (EDMS) Version 5.1.2 (FAA 2009) was used to estimate airplane emissions. EDMS estimates emissions generated from a specified number of landing and take-off cycles. Along with the emissions from the planes themselves, emissions generated from associated ground maintenance requirements are included. Average plane emissions were calculated based on the profile of aircraft currently servicing the San Francisco to Los Angeles Corridor. The number of air trips removed because of the HST was estimated through the travel demand modeling analyses conducted for the project.

**Power Plant Emissions**

The HST System, including the propulsion of the trains and the operations of the stations and maintenance facilities, would be powered by the state’s electricity grid. Because no dedicated generating facilities are proposed for this project, no source facilities can be identified. Therefore, emission changes from power generation were predicted on a statewide level. In addition, because of the state requirement that an increasing fraction (33% by 2020) of electricity generated for the state’s power portfolio must come from renewable energy sources, the emissions generated for the HST System are expected to be lower in the future as compared to emissions estimated for this analysis, which are based on the state’s current power portfolio. In addition, the Authority has adopted a goal to purchase the HST System’s power from renewable energy providers.

**3.3.4.3 Microscale CO Analysis**

Analyses were conducted to estimate the potential localized air quality impacts of HST-related changes in traffic conditions near heavily traveled roadways, congested intersections, and areas near train station parking structures. Microscale CO modeling was performed by using EMFAC2007 and the California LINE Source Dispersion Model, Version 4 (CALINE4) (Caltrans 1989) air quality dispersion model to estimate existing (2009), future (2035) No Project Alternative, and future (2035) CO levels with the HST alternatives at selected locations.

**What Is a Microscale CO Analysis?**  
 A microscale CO analysis is an estimation of potential localized CO concentrations and a comparison of those concentrations to the NAAQS.

**Site Selection and Receptor Locations**

Traffic conditions at affected intersections were evaluated to identify which intersections in the study area would have the potential to cause CO hot spots. Intersections within the study area were screened based on changes in intersection volume, delay, and LOS between the existing condition, No Project Alternative, and HST alternatives. Intersections were considered to have the potential to cause CO hot spots if the LOS decreased from D or better to D or worse under any of the HST alternatives. Intersections that were already below LOS D were considered to have the potential to cause CO hot spots if their LOS, delays, and/or volume would increase from the existing condition and No Project Alternative with any of the HST alternatives. Using these criteria, intersections were ranked according to LOS, increased delay, and total traffic volume of the HST alternative compared to the existing condition and No Project Alternative. The three intersections with the worst LOS, delay, and/or traffic volume were included in the CO hot-spot modeling.

Changes in emissions from vehicular activities near the Merced and Fresno parking structure locations were also modeled because of the emission increases near these locations.

Receptors for both the intersection and parking structure analyses were located in accordance with University of California, Davis, CO Protocol (Caltrans 1997). All receptors used were located at a height of 1.8 meters. Receptors for the intersection analysis were located 3 meters from the roadway spaced at 25 and 50 meters from the intersection for both the 1-hour and 8-hour analyses. For the parking structure, 1-hour analysis receptors were located 3 meters from the parking structure at each corner and the entrance of the structure.

**Emission Model**

Vehicular emissions were estimated by using EMFAC2007, which is a mobile source emission estimate program that provides current and future estimates of emissions from highway motor vehicles. EMFAC2007 (the latest in the EMFAC series) was designed by CARB to address a wide variety of air pollution modeling needs and incorporates updated information on basic emission rates, more realistic driving patterns, separation of start and running emissions, improved correction factors, and changing fleet composition.

### **Dispersion Model**

Mobile source dispersion models are the basic analytical tools used to estimate CO concentrations expected under given traffic, roadway geometry, and meteorological conditions. The mathematical expressions and formulations that compose the models attempt to describe a complex physical phenomenon as closely as possible. The dispersion modeling program used in this study for estimating pollutant concentrations near roadway intersections is the CALINE4 dispersion model developed by Caltrans.

The analysis of roadway CO impacts followed the protocol recommended by Caltrans (Caltrans 1997). It is also consistent with CO modeling procedures identified in the SJVAPCD CEQA guidance (SJVAPCD 2002).

### **Meteorological Conditions**

The transport and concentration of pollutants emitted from motor vehicles are influenced by three principal meteorological factors: wind direction, wind speed, and the temperature profile of the atmosphere. The values for these parameters were chosen to maximize pollutant concentrations at each prediction site (i.e., to establish a conservative worst-case situation). The *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a), which was prepared for the project, provides these values. Their selection was based on recommendations from the CEQA Air Quality Handbook (South Coast Air Quality Management District [SCAQMD] 1993), Caltrans' CO Protocol (Caltrans 1997), and EPA guidelines.

### **Persistence Factor**

Peak 8-hour concentrations of CO were obtained by multiplying the highest peak-hour CO estimates by a persistence factor. The persistence factor accounts for the fact that over 8-hours (as distinct from a single hour) vehicle volumes will fluctuate downward from the peak hour, vehicle speeds may vary, and meteorological conditions including wind speed and wind direction will vary compared to the conservative assumptions used for the single hour. A persistence factor of 0.7, as in the CO protocol (Caltrans 1997), was used in this analysis.

### **Background Concentrations**

Microscale modeling is used to predict CO concentrations resulting from emissions from motor vehicles, using roadways immediately adjacent to the locations at which predictions are being made. A CO background level must be added to these values to account for CO entering the area from other sources upwind of the receptors. CO background levels were from data collected at a monitoring station located away from the influence of local traffic congestion. For this study area, background data collected at the Fresno-Drummond monitoring station were used.

The use of these monitors is conservative because while they are the closest monitors to the general study area stations and have a neighborhood spatial scale, they are influenced by traffic-related emissions. In addition, future CO background levels are anticipated to be lower than existing levels because of mandated emission source reductions.

The second-highest monitored values were used as background concentrations. The second-highest monitored 1-hour CO concentration, based on the latest 3 years of available data, was 3.5 ppm, and the second-highest 8-hour average was 2.14 ppm for the Fresno-Drummond monitoring station.

### **Traffic Information**

Traffic data for the air quality analysis were derived from traffic counts and other information developed as part of an overall traffic analysis for the project. Output from the Traffix 8.0 (Dowling Associates, Inc. 2008) and Synchro6 (Trafficware Ltd. 2004) signal-timing traffic models was used to obtain signal-timing parameters. The microscale CO analysis was performed based on data from this analysis for the AM and

PM peak traffic periods. These are the periods when maximum traffic volumes occur on local streets and when the greatest traffic and air quality impacts of the proposed project are expected.

### **Analysis Years**

CO concentrations were predicted for existing conditions (2009) and the project's design year (2035).

#### **3.3.4.4 Particulate Matter Hot-Spot Analysis**

While the HST project is subject to the general conformity and not transportation conformity guidelines, because the region is classified as a federal nonattainment area for PM<sub>2.5</sub> and a federal maintenance area for PM<sub>10</sub>, a PM<sub>10</sub> and PM<sub>2.5</sub>, a hot-spot analysis following EPA's 2010 *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM<sub>2.5</sub> and PM<sub>10</sub> Nonattainment and Maintenance Areas* (EPA 2010c) was conducted. The analysis focused on potential air quality concerns under NEPA from project effects on roads and followed the recommended practice in the EPA Final Rule regarding the localized or "hot-spot" analysis of PM<sub>2.5</sub> and PM<sub>10</sub> (40 CFR Part 93, issued March 10, 2006).

#### **What Is a PM Hot-Spot Analysis?**

A hot-spot analysis is an estimation of localized PM<sub>10</sub> and PM<sub>2.5</sub> pollutant concentrations and a comparison of those concentrations to the NAAQS (40 CFR 93.101).

EPA specifies in 40 CFR 93.123(b)(1) that only "projects of air quality concern" are required to undergo a PM<sub>2.5</sub> and PM<sub>10</sub> hot-spot analysis. EPA defines projects of air quality concern as certain highway and transit projects that involve significant levels of diesel traffic or any other project that is identified by the PM<sub>2.5</sub> SIP as a localized air quality concern:

- New or expanded highway projects that have a significant number of or significant increase in diesel vehicles.
- Projects affecting intersections that are at LOS D, E, or F with a significant number of diesel vehicles or those that will degrade to LOS D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project.
- New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location.
- Projects in, or affecting, locations, areas, or categories of sites that are identified in the PM<sub>2.5</sub>- or PM<sub>10</sub>-applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

A discussion of the proposed project compared to projects of air quality concern, as defined by 40 CFR 93.123(b)(1), is provided in Section 3.3.6.3.

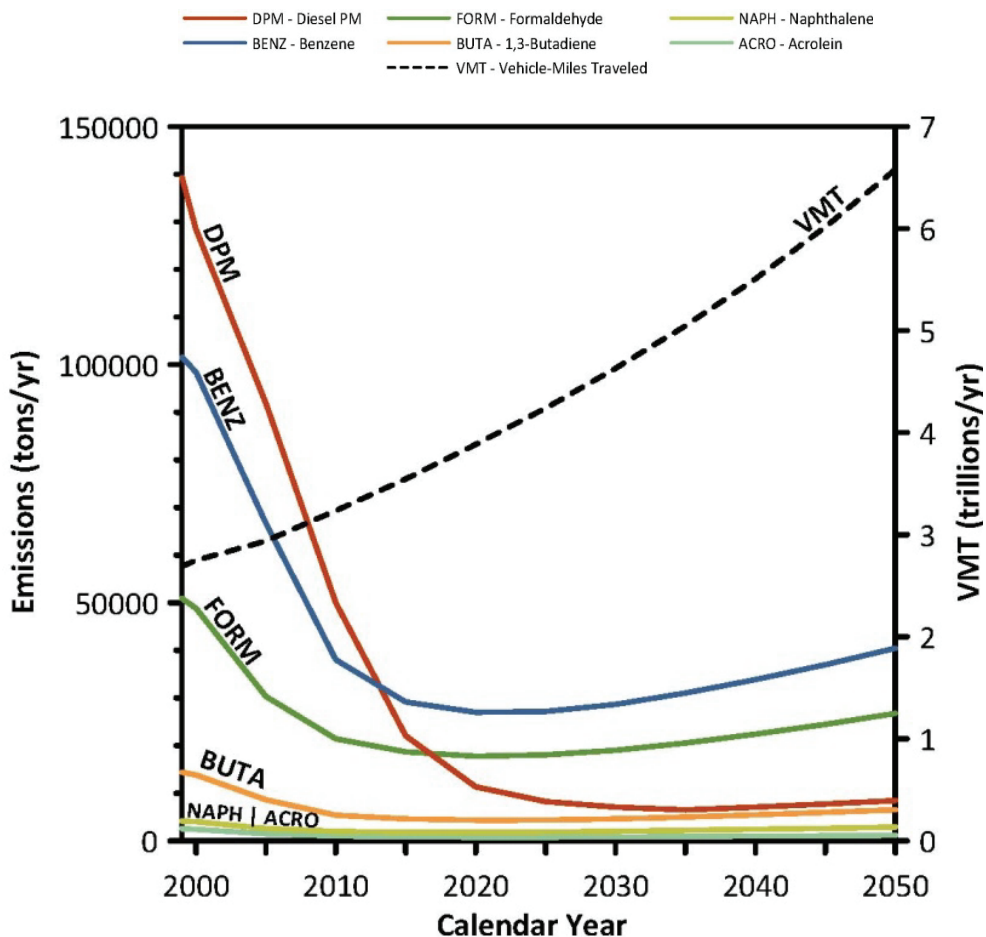
#### **3.3.4.5 Mobile Source Air Toxics Analysis**

Controlling air toxic emissions became a national priority with the passage of the Clean Air Act Amendments (CAAA) of 1990, whereby Congress mandated that EPA regulate 188 air toxics, also known as hazardous air pollutants. EPA assessed this expansive list in its latest rule on *Control of Hazardous Air Pollutants from Mobile Sources* (Federal Register, Vol. 72, No. 37, page 8430, February 26, 2007) and identified 93 compounds emitted from mobile sources that are listed in its Integrated Risk Information System (EPA 2011). In addition, EPA identified seven compounds with significant contributions from mobile sources that are among the national- and regional-scale cancer risk drivers from its 1999 National Air Toxics Assessment (EPA 1999). These seven compounds are acrolein, benzene, 1,3-butadiene, diesel particulate matter plus diesel exhaust organic gases (diesel PM), formaldehyde, naphthalene, and polycyclic organic matter.

Under the 2007 rule, EPA sets standards on fuel composition, vehicle exhaust emissions, and evaporative losses from portable containers. The new standards are estimated to reduce total emissions of MSATs by



330,000 tons in 2030, including 61,000 tons of benzene. Concurrently, total emissions of VOC will be reduced by over 1.1 million tons in 2030 as a result of adopting these standards. Future emissions likely would be lower than present levels as a result of EPA’s national control programs, which are projected to reduce MSAT emissions by 72% from 1999 to 2050, even if VMT increases by 145%, as shown in Figure 3.3-2.



<sup>a</sup> Annual emissions of polycyclic organic matter are projected to be 561 tons/yr for 1999, decreasing to 373 tons/yr for 2050.

<sup>b</sup> Trends for specific locations may be different, depending on locally derived information representing vehicle miles traveled, vehicle speeds, vehicle mix, fuels, emission control programs, meteorology, and other factors.

Source: FHWA (2009).

**Figure 3.3-2**  
 National MSAT Emission Trends (1999–2050)  
 for Vehicles Operating on Roadways Using EPA’s Mobile6.2 Model

On February 3, 2006, FHWA released Memorandum: *Interim Guidance on Air Toxic Analysis in NEPA Documents* (FHWA 2006). This guidance was superseded on September 30, 2009, by FHWA’s Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA Documents (FHWA 2009). The purpose of FHWA’s guidance is to advise on when and how to analyze MSATs in the NEPA process for highways. This guidance is interim because MSAT science is still evolving. As the science progresses, the FHWA is expected to update the guidance. The FHWA’s Interim Guidance groups projects into the following tier categories:



- No analysis for projects that have no potential for meaningful MSAT impacts.
- Qualitative analysis for projects with a low potential for MSAT impacts.
- Quantitative analysis to differentiate alternatives for projects with a higher potential for MSAT impacts.

The project has a low potential for MSAT impacts. Accordingly, a qualitative analysis was used to provide a basis for identifying and comparing the potential differences among MSAT emissions, if any, from the HST alternatives. The qualitative assessment is derived in part from the FHWA study *A Methodology for Evaluating Mobile Source Air Toxic Emissions Among Transportation Project Alternatives* (FHWA 2010).

#### **3.3.4.6 Asbestos**

Asbestos minerals occur in rock and soil as the result of natural geologic processes, often in veins near earthquake faults in the coastal ranges and the foothills of the Sierra Nevada Mountains and other areas of California. Naturally occurring asbestos (NOA) takes the form of long, thin, flexible, separable fibers. Natural weathering or human disturbance can break NOA down to microscopic fibers that are easily suspended in air. When inhaled, these thin fibers irritate tissues and resist the body's natural defenses. In addition, asbestos-containing materials may have been used in constructing buildings that would be demolished.

Asbestos is a known human carcinogen. It causes cancers of the lung and the lining of internal organs, as well as asbestosis and pleural disease that inhibit lung function. EPA is working to address concerns about the potential impacts of NOA in several areas in California.

The California Geological Survey identifies ultramafic rocks in California to be the source of NOA. The California Geological Survey published *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos* (CDMG 2000). This study was used to determine if NOA would be located within the project area.

#### **3.3.4.7 Greenhouse Gas Analysis**

The proposed project would reduce long-distance, city-to-city travel along freeways and highways throughout the state, as well as long-distance, city-to-city aircraft take-offs and landings. The project would also affect electrical demand throughout the state. These elements would affect GHG emissions on both a statewide and regional study area level. The following sections discuss the methodology for estimating GHG emissions associated with the operation of the project.

The methodology for estimating GHG emissions associated with construction is included in Section 3.3.4.9, Construction Phase Analysis.

#### **On-Road Vehicle Emissions**

The on-road vehicle GHG emission analysis was conducted by using average daily VMT estimates and associated average daily speed estimates, which were calculated for each affected county. GHG emission factors were estimated from EMFAC2007, using parameters set within the program for each individual county to reflect travel within each county and statewide parameters appropriate for each county. The analysis was conducted for the future No Project and HST alternatives for the project's design year (2035).

To determine overall GHG burdens generated by on-road vehicles, estimated VMTs were multiplied by appropriate GHG emission factors, which were based on speed, vehicle mix, and analysis year. According to EMFAC2007, fuel economy factors are forecast to improve only slightly between 2008 and 2035. However, this conclusion does not consider recent regulatory actions that will likely result in substantial future improvements in fuel economy and CO<sub>2</sub> emission factors. These actions are as follows:

- EPA and NHTSA updated the CAFE fuel standards on May 7, 2010 (75 FR 25324), requiring substantial improvements in fuel economy for all vehicles sold in the United States starting with model years 2012 through 2016.
- EPA and NHTSA issued a final rule of Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles (76 FR 76 57107) on September 15, 2011, which will reduce CO<sub>2</sub> emissions by approximately 270 MMT during the 2014 through 2018 model years.
- The State of California has enacted legislation requiring dramatic improvements in vehicle fuel economy for all vehicles sold in California.

### **Airport Emissions**

Airport GHG emissions were estimated using the same methodology as described in Section 3.3.4.2.

### **Power Plant Emissions**

Power plant GHG emissions were estimated using the same methodology as described in Section 3.3.4.2.

#### **3.3.4.8 HMF Impact Analysis**

The HST Project would include a heavy maintenance facility (HMF) that would service and repair the rail cars and locomotives. The facility would include locomotives, heavy-duty equipment (e.g., cranes, backhoes, loaders, and emergency generators), heavy-duty delivery trucks, and a spray booth for painting the trains. Although measures would be incorporated to minimize atmospheric emissions from these sources, such as the use of electric yard trains to move rail cars and electric locomotives around the site and the use of diesel-retrofits on heavy-duty diesel engines, the activities at the HMF site would generate emissions that conceivably could affect sensitive land uses. Dispersion modeling analysis was conducted for the HMF emissions to evaluate the impacts on air quality. In addition, a health risk analysis was conducted to evaluate the cancer risk impacts on sensitive receptors near the HMF. The major sources of HMF emissions include:

- Switch diesel locomotive activities associated with maintenance of way operations
- Spray booth painting operations
- Diesel equipment<sup>1</sup>
- Diesel trucks

### **HMF Locations**

Several locations are being considered for the HMF site including Harris-DeJager, Fagundes, Gordon-Shaw, Kojima Development, and Castle Commerce Center sites. The final location of the HMF has not been selected. Therefore, an air quality analysis was conducted for a prototypical facility (using the current facility design and anticipated activities) to determine whether HMF operations have the potential to significantly affect nearby sensitive land uses.

### **HMF Pollutants of Concern**

Both criteria and non-criteria toxic air contaminants (TACs) were considered in this analysis. The criteria pollutants considered are:

- NO<sub>2</sub> from diesel locomotives, diesel equipment, and trucks
- PM<sub>10</sub> and PM<sub>2.5</sub> from both diesel engines and spray booth operations

<sup>1</sup> The diesel equipment includes nonroad diesel engines such as internal combustion engines (not including motor vehicle engines).



The TACs considered are contaminants identified according to the California's Office of Environmental Health Hazard Assessment (OEHHA)'s *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (Cal-EPA 2003) that may be emitted from HMF operations, including diesel engines and spray booth activities. Of these, diesel PM has the likelihood of contributing the most to the potential health effects of the HMF operations because of the type of activities that would occur at these facilities. Diesel PM has been identified by OEHHA as a TAC based on its potential to cause cancer and other adverse health problems, including respiratory illnesses and increased risk of heart disease. There are also a number of other toxic pollutants of different toxicities that are either carcinogenic or non-carcinogenic that can be potentially released from spray booth operations and diesel vehicular exhaust. Analyses were therefore conducted for diesel PM and applicable TACs that considered both chronic (long-term) carcinogenic and non-carcinogenic and acute (short-term) health risks.

In addition to the above pollutants, CO, VOC, and GHG emissions from HMF operations were estimated. CO and GHG are not expected to cause localized air quality impacts, due to the relatively low CO background concentrations and the global nature of GHG impacts. VOC emissions would be evaluated in terms of speciated toxics in the analysis. Therefore, CO, VOC, and GHG emissions from HMF operations are only included in the regional air quality impact discussion.

### **HMF Emission Factors and Rates**

Emissions factors from the diesel-powered engines and spray booth operations were estimated as follows:

- PM<sub>10</sub> emission factors were conservatively used to represent diesel PM emission factors. Most diesel PM emissions, however, are made up of particles smaller than 2.5 microns (PM<sub>2.5</sub>), which are estimated to be 92% of PM<sub>10</sub> values.
- Diesel PM (PM<sub>10</sub>), PM<sub>2.5</sub>, NO<sub>2</sub>, VOC, and CO emissions from switch locomotives were estimated using EPA Tier 4 emission standards (which are also adopted by CARB) applicable for newly manufactured (after 2015) locomotives (40 CFR Title 40, Part 89) that use stringent control technologies and use ultra-low sulfur diesel fuel. This is a reasonable assumption because the HMF would be operational by 2021.
- All new locomotives after 2015 must meet these standards. To enable catalytic after treatment methods at the Tier 4 stage, EPA requires the use of low-sulfur diesel fuel for all on-road and off-road engines after 2015. A sulfur limit of 500 parts per million (ppm) has been in effect since June 2007, and after June 2012, this limit becomes 15 ppm. California in 2006 also adopted regulations lowering the sulfur content of diesel fuel to less than 15 ppm. Refineries in California are already making low-sulfur diesel so it is available where needed, and transit agencies in California have been required to use ultra-low sulfur diesel since July 2002.
- Locomotive emission rates were also estimated based on locomotive type and assumptions regarding notch settings, activity times, and durations.
- The assumption that all switch locomotives would be diesel-powered might be conservative because some or all of these vehicles may be electrically powered (or dual-fueled) and therefore have no (or less) onsite generated emissions.
- CO<sub>2</sub> emissions from moving locomotives were estimated based on diesel fuel density, carbon content, and consumption rate per brake-(hp)-hour (EPA-420-F-09-025). CO<sub>2</sub> emissions from idling locomotives were estimating using the same fuel density and carbon content as well as an assumed consumption per idling-hour, based on the seasonal conditions.
- It was conservatively assumed that all of the NO<sub>x</sub> released from the diesel engines (which is generally composed of only a small percentage of NO<sub>2</sub>) would be converted in the atmosphere to NO<sub>2</sub> by the time it reached the site boundary, even though a lower conversion rate would likely occur.

- CO<sub>2</sub> emissions from moving and idling locomotives were estimated using a standard diesel fuel density, carbon content, and consumption rate per brake- hp-hour (EPA-420-F-09-025).
- SO<sub>2</sub> emissions from moving and idling locomotives were estimated using a standard diesel-fuel density, a sulfur content of ULSD (which was assumed to be 15 ppm), and a consumption rate per brake-hp-hour (EPA-420-F-09-025).
- For other diesel equipment, EPA's Tier 4 emission standards for non-road diesel engines were used (69 FR 38957-39273, 29 June 2004) to estimate diesel PM (PM<sub>10</sub>), PM<sub>2.5</sub>, NO<sub>2</sub>, VOC, and CO emissions. In the absence of a VOC-specific emission factor, VOC emissions were represented using the non-methane hydrocarbon Tier 4 emission standard.
- CO<sub>2</sub> emissions from other diesel equipment were estimated using the CARB's OFFROAD 2007 (CARB 2006b), for a 200 hp, model year 2017 equipment belonging to the Other General Industrial Equipment category.
- SO<sub>2</sub> emissions from diesel equipment were estimated using Santa Barbara County Air Pollution Control District's *Technical Information and References*, Table 2, "Construction Equipment Controlled Emission Factors" (Santa Barbara County Air Pollution Control District 1997).
- On-road diesel truck PM (PM<sub>10</sub>), PM<sub>2.5</sub>, NO<sub>2</sub>, VOC, CO, SO<sub>2</sub>, and CO<sub>2</sub> emissions were estimated using EMFAC2007 emissions factors for heavy-heavy duty trucks running at 10 mph for the year 2017, which is a conservative assumption because the HMF would be operational only by 2021.
- VOCs from paint booth emissions were estimated using conservative volatility rates (i.e., using the high end of the percent VOC content allowed by state and district regulations) and paint usage projections
- VOCs from paint booth emissions were also estimated based on the assumption that the paint booths would be equipped with conventional filters with a 90% control efficiency.
- Speciated TAC emissions from paint booth operations were estimated using CARB's "Organic Speciation Profile for Surface Coating Operations," found in *Organic Chemical Profiles for Source Categories* (CARB 2011a).
- Emissions of metal compounds, which are bonded to diesel particulate matter (DPM) from diesel combustion, were calculated by using CARB's "PM Speciation Profile for Diesel Vehicle Exhaust," found in *PM Speciation Profile for Source Categories* (CARB 2011b).
- Emissions of organic compounds from diesel combustion were estimated using CARB's "Organic Speciation Profile for Diesel Light and Heavy Equipment," found in *Organic Chemical Profiles for Source Categories* (CARB 2011a).

Emission rates for diesel equipment and trucks were estimated based on the following HMF operating scenario which was supplied by the project design engineers:

- Two switch locomotives (for maintenance-of-way operations) and six pieces of diesel-fueled equipment would operate at the HMF.
- Two maintenance-of-way locomotives, which are assumed to be 2,000 hp each, would idle for 2 hours and move around the HMF site for 2 hours over a 24-hour period, and the locomotives would go through all notches (gears) when moving.
- The diesel equipment, which is assumed to be 200 hp each, would operate for 8 hours over a 24-hour period.
- Twenty diesel trucks would operate on the site for 8 hours over each 24-hour time period.

The *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a) provides estimated emission factors and emission rates for the pollutants evaluated.

### **HMF Stationary Source Dispersion Analysis**

A detailed dispersion modeling analysis was conducted to estimate the potential impacts of HMF emissions on nearby sensitive land uses. Using the same emission rates as those used in the screening analysis, the EPA AERMOD model (EPA 2006a) was used to simulate physical conditions and predict pollutant concentrations at specific distances from the boundaries of a HMF site. AERMOD is generally applied to estimate impacts from simple point-source emissions from stacks, as well as emissions from volume and area sources. The model accepts actual hourly meteorological observations and directly estimates hourly and average concentrations for various time periods.

A prototypical site was analyzed to evaluate the HMF operation impacts. Pollutant concentrations were estimated at site boundary and in increments of 100 feet around the site. Regulatory default options and the rural dispersion algorithm of AERMOD were used in the analysis. The maximum concentrations at these distances were compared with NAAQS, CAAQS, and health-related guidelines to determine the level of impacts.

Emissions from expected operations were simulated as one area source spread out over the 140-acre HMF site. Five years of meteorological data (2004 through 2009) from Merced County Airport, as compiled by the San Joaquin Valley Air Pollution Control District, were used. An emissions release height was assumed to be 14.8 feet to approximate the stack heights of the locomotive engines, diesel trucks, and spray booth stack(s).

Maximum diesel PM and applicable TAC concentrations were used to estimate cumulative cancer risks and the overall non-cancer chronic and acute hazard index associated with HMF operations using procedures developed by OEHHA (OEHHA 2003). The cancer risk calculation procedure developed by OEHHA was used to estimate increased cancer risks resulting from the HMF's diesel PM and TAC emissions. Details of the risk analysis are in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a). Cancer risks will be compared to the SJVAPCD CEQA threshold of 10 in a million to assess the level of impacts.

### **HMF Mobile Source CO Hot-Spot Analysis**

CO hot-spot analysis was conducted to evaluate the potential impacts of traffic volume change near the HMF stations. The Castle Commerce Center HMF site is near the largest population and the most sensitive receptors land uses; this site was evaluated in the CO hot-spot analysis because of its proximity to signalized intersections. CO hot-spot analysis was not conducted for the other potential HMF locations because they are located in remote rural areas and thus are not expected to cause traffic congestion at nearby intersections (see Section 3.2).

#### **3.3.4.9 Construction Phase Analysis**

Construction-phase emissions were quantitatively estimated for the earthwork and major civil construction activities of the following components of the project:

- At-grade guideway segments
- Elevated guideway segments
- Retained fill guideway segments
- Substations
- HMF
- HST stations
- Roadways and roadway overpasses

These major construction activities would account for the majority of earthwork, the largest number of diesel-powered off-road construction equipment, and the majority of material to be hauled along public





streets compared to other minor construction activities of the project. Therefore, the regional emissions and localized emissions from these major activities would account for the majority of construction emissions that would be generated by the construction of the proposed project. The estimated construction emissions from these major activities were then used to estimate the regional air quality and localized air quality impacts that would occur during the construction phase. Default emission rates for activities, such as architectural coating, were used if information specific to the project was not available.

### **Methodologies and Assumptions**

**Construction Activities:** Criteria pollutant and GHG emissions from regional building demolition and construction of the at-grade rail segments, elevated rail segments, retained fill rail segments, transaction power substations, industrial buildings at the HMF, and HST stations including parking garages and platform facilities were calculated using the URbAnEMISsions (URBEMIS) 2007 model. URBEMIS 2007 (Urbemis Environmental Management Software 2007) uses emission factor data for off-road equipment based on data from the OFFROAD 2007 and EMFAC2007 models. The URBEMIS model was chosen because it uses statewide off-road emission factors or county or air basin specific on-road emission factors, allows for overlapping construction phases, and provides emission rates on an annual basis. In addition, it is appropriate to use URBEMIS for linear construction projects such as the construction of the HST when project-specific construction phasing and equipment is known and then used (as it was here) to override the URBEMIS defaults that otherwise may be inappropriate for a linear project. Detailed analysis of the URBEMIS model features can be found in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a)

Mobile source emission burdens from worker trips and truck trips were calculated using VMT estimates and appropriate emission factors from EMFAC2007. Project-specific load factors (the ratio of average equipment horsepower utilized to maximum equipment horsepower) were input into the URBEMIS 2007 program to account for updated load factor data from the CARB's Off-road/Nonroad 2011 (Sept 2011) database.<sup>2</sup> Adjustment was also made to account for an error built into URBEMIS 2007's application of load factor data; failure to make the adjustment would otherwise result in under-reporting emissions.

URBEMIS 2007 allows the user to specify what types of fugitive dust control and tailpipe emission control measures will be used. Control measures that construction contractors will be required to implement as outlined in the 2005 Statewide Program EIR/EIS were incorporated in the analysis, such as watering unpaved access roads and disturbed areas three times daily, and promptly replacing ground cover over disturbed areas.

Project-specific data, including construction equipment lists and the construction schedule, were used for construction associated with the alignment/guideway. Where project-specific data were not available, applicable URBEMIS 2007 default settings were used. Calculations were performed for each year of construction. It should be noted that the values used in the Final EIR/EIS have been refined from the conservative estimates used in the Draft EIR/EIS.

The project's construction schedule is provided in Chapter 2, Alternatives. Major activities were grouped into the following categories:

- Mobilization – assumed to occur at two main staging areas
- Site preparation including demolition, land clearing and grubbing
- Earth-moving

<sup>2</sup> See [http://www.arb.ca.gov/msei/categories.htm#offroad\\_motor\\_vehicles](http://www.arb.ca.gov/msei/categories.htm#offroad_motor_vehicles) (Table D-7 of ARB's Appendix D at this website). These factors represent the latest information regarding construction equipment usage; the EIS/EIR calculations account for this latest information. The CARB updates also included updates to the average industry equipment age (see pages D-18 to D-25 of ARB's Appendix D), generally concluding that the average equipment age is newer/cleaner than then-existing ARB databases contained. Because of time pressures and modeling complexities, the construction emissions estimates in this EIS/EIR do not account for the newer/cleaner equipment. Doing so would reduce the emission levels presented by a small amount, likely under 10%.

- Roadway crossings
- Elevated structures
- Track laying – elevated, at-grade and retained fill
- Traction power supply station
- Switching station
- Paralleling station
- HMF – including demolition, building and track construction
- Merced station
- Fresno station
- Hauling emissions – including truck and rail
- Demobilization

**Material Hauling:** Emissions from the exhaust of trucks used to haul material (including concrete slabs) to the construction site were calculated using the heavy-duty truck emission factors from EMFAC2007 and anticipated travel distances of haul trucks within the San Joaquin Valley Air Basin (SJVAB). Ballast materials could potentially be hauled by rail within the air basin. Rail emission factors from EPA document *Emission Factors for Locomotives* (EPA 2009) and the travel distance by rail to the project site were used to estimate rail emissions.

Ballast materials would be potentially transported from locations outside of SJVAB. For the regional emission analysis, emissions from ballast material-hauling were calculated using the distance traveled within the SJVAB. Emissions from ballast material-hauling by trucks and locomotives outside the SJVAB were also estimated based on the travel distances and transportation method (by rail or by truck) from the locations where ballast materials would be available. Rail emission factors using EPA guidance (EPA 2009) were used to estimate the locomotive emissions. Other construction materials would likely be delivered from supply facilities within the SJVAB.

Five potential quarries that provide ballast material were identified. Of these, three quarries, including Napa Quarry, Lake Herman Quarry, San Rafael Rock Quarry, were included in the evaluation because of their proximity to the project construction site. These three quarries are all located within 70 miles of the SJVAB border and would have material available for the project construction. The Bangor Rock Quarry Site A was included in the evaluation because it is located within 100 miles of the SJVAB border. In addition, this quarry would have material available for the project needs in quantities that exceed the material quantities available at the closest quarries. The other quarry, Kaiser Eagle Mountain Quarry, which is located 350 miles by rail (250 miles by road) from the border of the SJVAB, was analyzed because the annual production rate at this quarry was sufficient to meet construction material requirements.

The analysis was based on the assumption that ballast would be transferred either by diesel truck from the quarry to rail (if there was no rail head onsite) and then by rail to the border of SJVAB, entirely by rail to the border of the SJVAB (if there was a rail head onsite), or by diesel truck from the quarry to the border of the SJVAB. Emissions could potentially occur in several air basins and air districts outside SJVAB.

**Concrete Batch Plants:** Concrete would also be required for construction of bridges used to support the elevated sections of the alignment and for construction of the retaining wall used to support the retained fill sections of the alignment. To provide enough onsite concrete, an estimated three batch plants would operate in the project area during construction of the alignment sections. Because the locations of the concrete batch plants are unknown, emissions were estimated based on the total amount of concrete required (independent of the number of concrete batch plants) and emission factors from AP-

42 Chapter 11.12 – Concrete Batching (EPA 2006b). Emissions from on-road truck trips associated with transporting material to and from the concrete batch plants were also included.

The HST alternatives would also include the relocation and expansion of freeway segments, local roads, and overpasses and reconstruction of several intersections. Fugitive dust and exhaust emissions from these activities were estimated using the default equipment list and construction schedules from the Sacramento Roadway Construction Emissions Model (SMAQMD 2009) and URBEMIS 2007.

### **Schedule**

Chapter 2, Alternatives, provides more information regarding construction methods and schedules for the project. The equipment and workforce schedule was used with URBEMIS 2007 to calculate construction emissions. The *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a) provides the detailed equipment and workforce schedule.

Project mobilization would occur from March 2013 to May 2013. Regional building demolition and land grubbing for the at-grade, elevated, and retained fill rail segments are expected to begin July 2013, concluding in December 2017. The major construction activities are expected to occur between 2013 and 2019, with construction of the HMF completed by 2019, and stations completed by 2022. Project demobilization would occur in 2017 and again in 2022.

### **Statewide EIR/EIS Programmatic Control Measures**

The project design incorporates the following design elements from the 2005 Statewide Program EIR/EIS mitigation strategies to reduce air quality impacts associated with construction and operation of the HST System. Because the 2005 Statewide Program EIR/EIS includes these measures, they are not considered mitigation but are calculated as part of the project construction emissions prior to mitigation. The effectiveness of these measures was not included in the mitigated emissions calculations but was included in the unmitigated emission estimates. The programmatic measures and their corresponding emissions reductions include:

- Replacing ground cover in disturbed areas (PM, 5%)
- Watering exposed surfaces three times daily (PM, 61%)
- Watering unpaved access roads three times daily (PM, 61%)
- Reducing speed on unpaved roads to 15 miles per hour (PM, 45%)
- Ensuring that trucks hauling loose materials would be covered (PM, 69%)
- Using low-VOC paint (VOC, 10%)
- Washing all trucks and equipment before exiting construction sites
- Suspending dust generating activities when wind speeds exceed 25 mph

### **Local Regulatory Control Measures**

Many of the control measures required by the SJVAPCD Regulation VIII are the same or similar to the control measures listed in the 2005 Statewide Program EIR/EIS. The emission reductions associated with SJVAPCD Regulation VIII are the same as the emission reductions associated with the 2005 Statewide Program EIR/EIS (Authority and FRA 2005) listed above.

#### **3.3.4.10 Significance Thresholds**

The following values were used to determine whether estimated project impacts are considered to be significant.



**Federal**

Pursuant to NEPA regulations (40 CFR 1500-1508), project effects are evaluated based on the criteria of context and intensity. Context means the affected environment in which a proposed project occurs. Intensity refers to the severity of the effect, which is examined in terms of the type, quality, and sensitivity of the resource involved, location and extent of the effect, duration of the effect (short- or long-term), and other consideration of context. Beneficial effects are identified and described. When there is no measurable effect, impact is found not to occur. Intensity of adverse effects is summarized as the degree or magnitude of a potential adverse effect where the adverse effect is thus determined to be negligible, moderate, or substantial.

Project emissions of criteria pollutants are compared to the general conformity *de minimis* applicability thresholds (GC thresholds) on a calendar-year basis for both construction and operational emissions. If annual project-related emissions generated in a nonattainment or maintenance area exceed the GC thresholds, a GC determination is required. In addition, the project emissions may not cause new violations or exacerbate an existing violation of NAAQS. Table 3.3-2 presents the GC thresholds for the project.

If the project pollutant emissions are below the corresponding GC thresholds, and are expected to cause pollutant emissions that do not exceed other applicable emissions, air quality, or health risk thresholds (such as those in SJVAPCD CEQA guidelines), then the intensity of the impact is considered negligible. Air quality impacts of moderate intensity are defined as pollutant emissions below corresponding GC thresholds, but having the potential to exceed other applicable emissions, air quality, or health risk thresholds. Impacts of substantial intensity are defined as pollutant emissions that are greater than the corresponding GC threshold, and having the potential to exceed other applicable emissions, air quality, or health risk thresholds.

**Table 3.3-2**  
 General Conformity Thresholds

Pollutant	Federal Attainment Status	Threshold Values (tons/year) <sup>a</sup>
NO <sub>2</sub>	Attainment	NA
Ozone precursor (nitrogen oxides [NO <sub>x</sub> ]) <sup>b</sup>	Nonattainment: Extreme	10
Ozone precursor (VOC) <sup>b</sup>	Nonattainment: Extreme	10
CO <sup>c</sup>	Maintenance	100
Sulfur oxides (SO <sub>x</sub> )	Attainment	NA
PM <sub>2.5</sub>	Nonattainment	100
PM <sub>2.5</sub> precursor (SO <sub>2</sub> ) <sup>d</sup>	Nonattainment	100
PM <sub>10</sub>	Maintenance	100
Lead	No Designation	NA

NA = not applicable  
<sup>a</sup> Thresholds from 40 CFR Parts 51 and 93.  
<sup>b</sup> Ozone reclassifications were made by EPA on May 5, 2010.  
<sup>c</sup> Only the urban portion of Fresno County is a maintenance area for CO.  
<sup>d</sup> SO<sub>2</sub> has a GC threshold of 100 tons per year. Due to the stringent requirement of using ultra-low sulfur content diesel in California, emissions of SO<sub>2</sub> anticipated from the project are expected to be negligible compared to the threshold. Regardless, further analysis and evaluation of SO<sub>2</sub> impacts are included in this report.  
 Sources: SJVAPCD (2010a); EPA (2010d).

**State**

Pursuant to CEQA Guidelines, impacts on air quality are considered to be significant if the project would:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Exceed or contribute to an exceedance of any air quality standard or contribute substantially to an existing or projected air quality violation (see discussion immediately below under "Local").
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).
- Expose sensitive receptors to substantial pollutant concentrations.
- Create objectionable odors affecting a substantial number of people.
- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

Quantitative emission thresholds that can be used to evaluate the significance level of impacts have been developed by the local air quality agency (SJVAPCD) and are discussed in the following section.

**Local**

The SJVAPCD *Guide for Assessing and Mitigating Air Quality Impacts* (SJVAPCD 2002) contains emissions thresholds used to evaluate the significance of a project's emissions (see Table 3.3-3). If a project's emissions are below the significance thresholds, impacts would be considered less than significant; if either the construction- or operational-phase emissions are greater than these values, impacts for that phase would be considered significant.

**Table 3.3-3**  
 SJVAPCD CEQA Construction and Operational Thresholds of Significance

Pollutant	Thresholds (tons/year)
NO <sub>x</sub>	10
Reactive organic gases (ROG)	10
PM <sub>10</sub>	15
PM <sub>2.5</sub>	15
Sources: SJVAPCD (2002); Willis (2010); Barber (2011).	

SJVAPCD does not have a quantitative SO<sub>2</sub> emission threshold, and SO<sub>2</sub> is not expected to be a pollutant of concern given the low background concentrations of the area and the limited amount of SO<sub>2</sub> emissions associated with the proposed project. Therefore, impacts from SO<sub>2</sub> emissions would be of negligible intensity and less than significant because emissions would not cause or contribute to an exceedance of an air quality standard or contribute substantially to an existing or projected air quality violation. However, SO<sub>2</sub> emissions are presented in this analysis for information purposes.



SJVAPCD does not have construction or operation emission thresholds for CO for CEQA. CO impacts during operation will be considered significant if the projected CO concentrations at potential hot-spot locations exceed NAAQS or CAAQS.

### **3.3.5 Affected Environment**

This section discusses the affected environment related to air quality and global climate change in the study area.

#### **3.3.5.1 Local Meteorological Conditions**

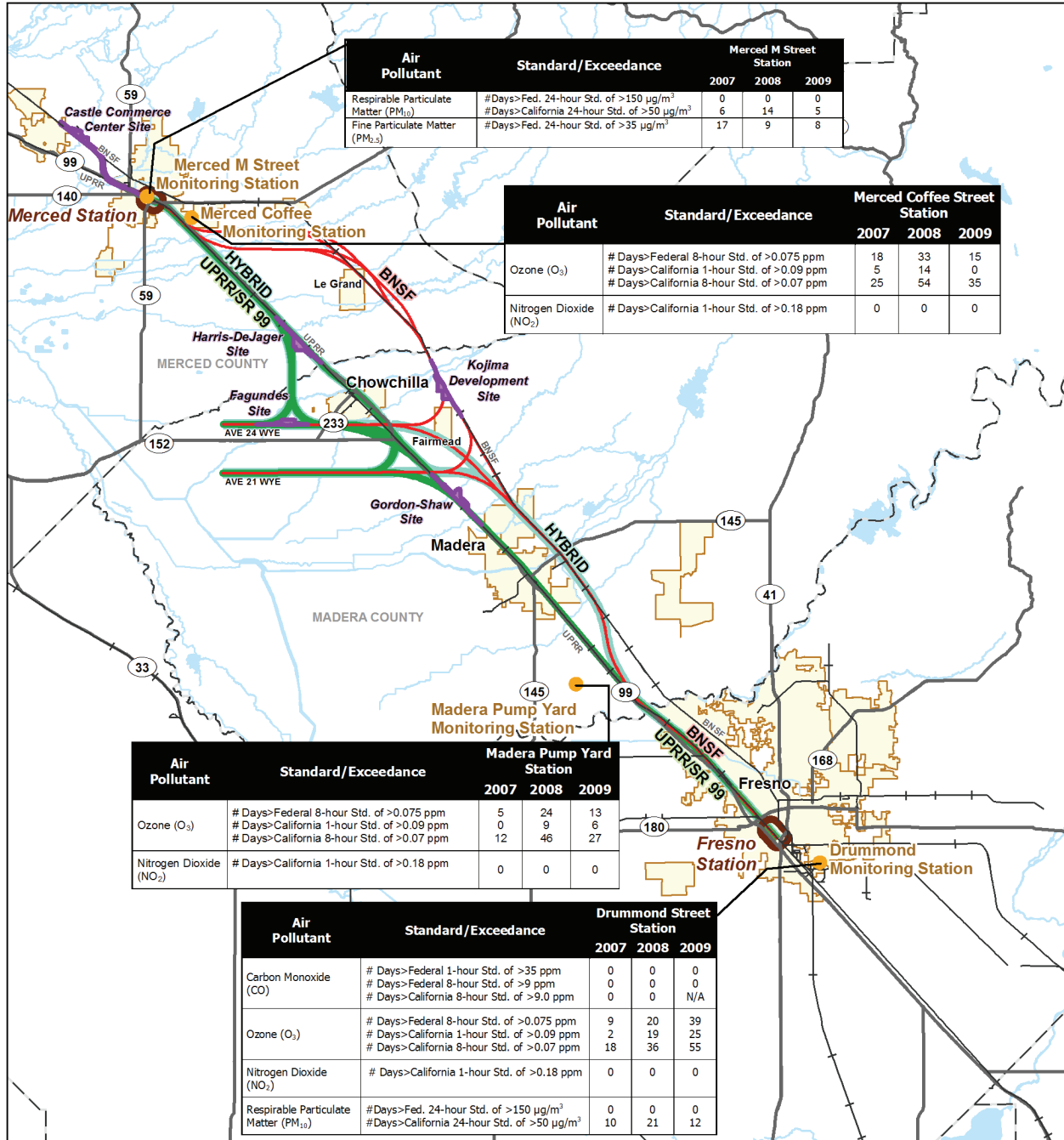
The rate and location of pollutant emissions and the meteorological conditions that influence movement and dispersal of pollutants in the atmosphere affect air quality. Atmospheric conditions, such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollutant emissions and local air quality levels.

Elevation and topography can affect localized air quality. The hills and mountains surrounding the San Joaquin Valley restrict air movement through and out of the majority of the basin. The SJVAB encompasses the southern two-thirds of California's Central Valley. Mountain ranges border the sides and southern boundary of the bowl. The valley's weather conditions include frequent temperature inversions; long, hot summers; and stagnant, foggy winters, all of which are conducive to forming and retaining air pollutants (SJVAPCD 2009a).

The SJVAB is typically arid in the summer, with cool temperatures and prevalent tule fog (i.e., a dense ground fog) in the winter and fall. The average high temperature in the summer is in the mid-90s, and the average low temperature in the winter is in the high 40s. January is typically the wettest month of the year, with an average of about 2 inches of rain. Wind direction is typically from the northwest, with speeds around 30 mph (Western Regional Climate Center 2009).

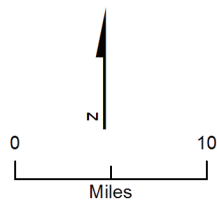
#### **3.3.5.2 Local Monitored Air Quality Data**

CARB maintains ambient air monitoring stations for criteria pollutants throughout California. The stations closest to the HST alternatives are the Merced Coffee, Madera Pump Yard, Fresno-Drummond, and Merced M Street monitoring stations. These stations, as shown in Figure 3.3-3, monitor NO<sub>2</sub>, O<sub>3</sub>, PM<sub>10</sub>, CO, and PM<sub>2.5</sub>, but do not monitor SO<sub>2</sub>. Table 3.3-4 summarizes the results of ambient monitoring at the four stations from the latest 3 years of available data. The land uses in the region range from urban and residential to rural and agricultural. As shown, exceedances of the NAAQS and CAAQS, primarily for O<sub>3</sub> and particulate matter, have been recorded.



Source: CARB (2010); U.S. EPA (2010).

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- UPRR/SR 99 Alternative
- BNSF Alternative
- Hybrid Alternative
- Potential Heavy Maintenance Facility
- City Limit
- Station Study Area
- - - County Boundary
- +— Railroad
- Ambient Air Monitoring Station Used in Study

**Figure 3.3-3**  
Air Quality Ambient Air Monitors

**Table 3.3-4**  
Ambient Criteria Pollutant Concentrations at Air Quality Monitoring Stations Closest to the Project

Air Pollutant	Standard/ Exceedance	Merced Coffee Station			Madera Pump Yard Station			Fresno-Drummond Station			Merced M Street Station		
		2007	2008	2009	2007	2008	2009	2007	2008	2009	2007	2008	2009
Carbon Monoxide (CO)	Year coverage	NM	NM	NM	NM	NM	NM	97	94	95	NM	NM	NM
	Max. 1-hour concentration (ppm)	NM	NM	NM	NM	NM	NM	4.4	2.6	N/A	NM	NM	NM
	Max. 8-hour concentration (ppm)	NM	NM	NM	NM	NM	NM	2.37	2.14	1.95	NM	NM	NM
	# Days>federal 1-hour std. of >35 ppm	NM	NM	NM	NM	NM	NM	0	0	N/A	NM	NM	NM
Ozone (O <sub>3</sub> )	# Days>Federal 8-hour Std. of >9 ppm	NM	NM	NM	NM	NM	NM	0	0	0	NM	NM	NM
	# Days>California 8-hour Std. of >9 ppm	NM	NM	NM	NM	NM	NM	0	0	0	NM	NM	NM
	Year Coverage <sup>a</sup>	99	97	100	98	88	92	95	100	98	NM	NM	NM
	Max. 1-hour Concentration (ppm)	0.105	0.131	0.094	0.091	0.120	0.111	0.110	0.124	0.118	NM	NM	NM
Ozone (O <sub>3</sub> )	Max. 8-hour Concentration (ppm)	0.096	0.120	0.083	0.083	0.107	0.096	0.092	0.112	0.101	NM	NM	NM
	# Days>Federal 8-hour Std. of >0.075 ppm	18	33	15	5	24	13	9	20	39	NM	NM	NM
	# Days>California 1-hour Std. of >0.09 ppm	5	14	0	0	9	6	2	19	25	NM	NM	NM
	# Days>California 8-hour Std. of >0.07 ppm	25	54	35	12	46	27	18	36	55	NM	NM	NM

Air Pollutant	Standard/ Exceedance	Merced Coffee Station			Madera Pump Yard Station			Fresno-Drummond Station			Merced M Street Station						
		2007	2008	2009	2007	2008	2009	2007	2008	2009	2007	2008	2009				
Nitrogen Dioxide (NO <sub>2</sub> )	Year Coverage	98	96	95	99	97	97	95	98	98	98	95	97	95	92	92	92
	Max. 1-hour Concentration (ppm)	0.050	0.060	0.056	0.047	0.053	0.046	0.067	0.076	0.076	0.076	0.067	0.076	0.076	0.076	0.076	0.076
	Annual Average (ppm)	0.009	0.009	0.008	0.010	0.010	0.009	0.016	0.015	0.014	0.014	0.016	0.015	0.014	0.015	0.015	0.015
	# Days>California 1-hour Std. of >0.18 ppm	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Respirable Particulate Matter (PM <sub>10</sub> )	Year Coverage	NM	NM	NM	NM	NM	NM	97	100	100	100	97	100	100	95	92	94
	Max. 24-hour Concentration (µg/m <sup>3</sup> )	NM	NM	NM	NM	NM	NM	93.0	99.5	84.0	84.0	93.0	99.5	84.0	76.8	65.1	
	#Days>Fed. 24-hour Std. of >150 µg/m <sup>3</sup>	NM	NM	NM	NM	NM	NM	0	0	0	0	0	0	0	0	0	
	#Days>California 24-hour Std. of >50 µg/m <sup>3</sup>	NM	NM	NM	NM	NM	NM	10	21	12	12	10	21	12	14	5	
Fine Particulate Matter (PM <sub>2.5</sub> )	Annual Average (µg/m <sup>3</sup> )	NM	NM	NM	NM	NM	NM	38.1	40.5	35.3	35.3	38.1	40.5	29.7	34.5	26.9	
	Year Coverage	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	95	97	95
	Max. 24-hour Concentration (µg/m <sup>3</sup> )	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	81.6	54.0	53.3
	State Annual Average (µg/m <sup>3</sup> )	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	15.2	N/A	13.6
	#Days>Fed. 24-hour Std. of >35 µg/m <sup>3</sup>	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	17	9	8
	Annual Average (µg/m <sup>3</sup> )	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	15.2	N/A	13.5

<sup>a</sup> Coverage is for an 8-hour standard.

- µg/m<sup>3</sup> = micrograms per cubic meter
- NM = not monitored
- N/A = not available
- > = greater than
- Std. = standard
- Max = maximum

Sources: CARB (2010); EPA (2010e).



**3.3.5.3 Attainment Status of Study Area**

Both EPA and CARB designate each county (or portions of counties) within California as attainment, maintenance, or nonattainment based on the area's ability to maintain ambient air concentrations below the air quality standards. Areas are designated as attainment if ambient air concentrations of a criteria pollutant are below the ambient standards. Areas are designated as nonattainment if ambient air concentrations are above the ambient standards. Areas previously designated as nonattainment that subsequently demonstrated compliance with the standards are designated as maintenance. Table 3.3-5 shows the designation status of the SJVAB for each criteria pollutant.

**Table 3.3-5**  
 Federal and State Attainment Status

<b>Pollutant</b>	<b>Federal Classification</b>	<b>State Classification</b>
O <sub>3</sub>	Nonattainment (Extreme)	Nonattainment
PM <sub>10</sub>	Maintenance	Nonattainment
PM <sub>2.5</sub>	Nonattainment	Nonattainment
CO	Urban portion of Fresno County: Maintenance Remaining basin: Attainment	Attainment
NO <sub>2</sub>	Attainment	Attainment
SO <sub>2</sub>	Attainment	Attainment
Source: CARB (2009a).		

Under the federal criteria, the SJVAB is currently designated as nonattainment for 8-hour O<sub>3</sub>, the 1997 PM<sub>2.5</sub> standard (annual standard of 15 micrograms/cubic meter [ $\mu\text{g}/\text{m}^3$ ] and 24-hour standard of 65  $\mu\text{g}/\text{m}^3$ ), and the 2006 24-hour PM<sub>2.5</sub> standard (35  $\mu\text{g}/\text{m}^3$ ). The SJVAB is a maintenance area for PM<sub>10</sub>, and the Fresno Urbanized Area is a maintenance area for CO. The SJVAB is in attainment for the NO<sub>2</sub> and SO<sub>2</sub>, and unclassified for lead.

Under the state criteria, the SJVAB is currently designated as nonattainment for 1-hour O<sub>3</sub>, 8-hour O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The SJVAB is an attainment/unclassified area for the state CO standard and an attainment area for the state NO<sub>2</sub>, SO<sub>2</sub>, and lead standards. The SJVAB is an unclassified area for the state hydrogen sulfide standard and the visibility-reducing particle standard; it is an attainment area for sulfates and vinyl chloride.

**3.3.5.4 Air Quality Plans and Programs**

**State Implementation Plan**

Planning documents for pollutants for which the study area is classified as a federal nonattainment or maintenance area are developed by the SJVAPCD and CARB and approved by EPA. Table 3.3-6 lists the planning documents relevant to the proposed project's study area.

**Transportation Plans and Programs**

Regional Transportation Planning Agencies (RTPAs) and MPOs within the SJVAB and the study area (i.e., the Merced County Association of Governments [MCAG], the Madera County Transportation Commission [MCTC], and the Fresno Council of Governments [Fresno COG]) are responsible for preparing RTPs. RTPs address a region's transportation goals, objectives, and policies for the next 20 to 25 years and identify the actions necessary to achieve those goals. MPOs prepare Transportation Improvement Programs (TIPs), which are 5-year programs of proposed projects that incrementally develop the RTP and contain a



listing of proposed transportation projects committed for funding. Transportation conformity projects are analyzed for air quality conformity with the SIP as components of RTPs and FTIPs.

**Table 3.3-6**  
 Planning Documents Relevant to Project's Study Area

Type of Plan	Status
1-Hour O <sub>3</sub> Attainment Plan	On March 8, 2010, EPA approved San Joaquin Valley's 2004 Extreme Ozone Plan for the 1-hour O <sub>3</sub> standard. However, effective June 15, 2005, EPA revoked the federal 1-hour O <sub>3</sub> standard for areas including the SJVAB. <sup>a</sup>
8-Hour O <sub>3</sub> Attainment Plan	On May 5, 2010, EPA reclassified the 8-hour O <sub>3</sub> nonattainment status of San Joaquin Valley from "serious" to "extreme." The reclassification requires the state to incorporate more-stringent requirements, such as lower permitting thresholds and implementing reasonably available control technologies at more sources. <sup>b</sup>  The 2007 8-hour Ozone Plan contained a comprehensive and exhaustive list of regulatory and incentive-based measures to reduce emissions of O <sub>3</sub> and particulate matter precursors throughout the San Joaquin Valley. On December 18, 2007, the SJVAPCD Governing Board adopted the plan with an amendment to extend the rule adoption schedule for organic waste operations. On January 8, 2009, EPA found that the motor vehicle budgets for 2008, 2020, and 2030 from the 2007 8-hour Ozone Plan were not adequate for transportation conformity purposes. <sup>a</sup>
PM <sub>10</sub> Maintenance Plan	On September 25, 2008, EPA redesignated the San Joaquin Valley to attainment for the PM <sub>10</sub> NAAQS and approved the 2007 PM <sub>10</sub> Maintenance Plan. <sup>c</sup>
PM <sub>2.5</sub> Attainment Plan	The SJVAPCD Governing Board adopted the 2008 PM <sub>2.5</sub> Plan on May 22, 2008, following a public hearing. This plan includes measures to attain the 1997 and 2006 federal standards as well as the state standard <sup>d</sup> . EPA designated the SJVAB under the new PM <sub>2.5</sub> national standard on October 8, 2009, and state implementation plans for the 2006 PM <sub>2.5</sub> standards will be due to EPA within 3 years of final designation.
CO Maintenance Plan	On July 22, 2004, CARB approved an update to the SIP that shows how 10 areas, including the SJVAB, will maintain the CO standard through 2018. On November 30, 2005, EPA approved and promulgated the implementation plans and designation of areas for air quality purposes. <sup>e</sup>
<sup>a</sup> SJVAPCD (2010b). <sup>b</sup> SJVAPCD (2007a). <sup>c</sup> SJVAPCD (2007b). <sup>d</sup> SJVAPCD (2008). <sup>e</sup> CARB (2004); EPA (2005a).	

The MCAG and MCTC adopted their respective 2011 RTPs and updated transportation conformity analyses in July 2010. Both RTPs discuss the HST Project. However, the HST Project is not included in the constrained project list (i.e., a list of projects for which funding has been committed) in Appendix D of the MCAG 2011 RTP or the project lists in Appendix C-D of the MCTC 2011 RTP or the 2011 FTIPs, and is therefore not included in the transportation conformity determination (MCAG 2010; MCTC 2010).

The Fresno COG adopted the 2011 RTP and associated transportation conformity determination on July 29, 2010. The Fresno COG's Final RTP supports the high-speed rail and corridor alignment option that provides service to major population centers within the Central Valley (Fresno COG 2010). The relocation and minor expansion of part of SR 99, which would be part of the HST Project, is included as an unconstrained project in the Final RTP. However, the rest of the project is not included in the unconstrained project list in Appendix D of the Fresno COG 2011 RTP or the 2011 TIP; therefore, it is not included in the transportation conformity determination (Fresno COG 2010).

### 3.3.6 Environmental Consequences

#### 3.3.6.1 Overview

**Construction:** Construction of the HST alternatives has the potential to cause temporary and significant localized air quality impacts including the exceedance of applicable de minimis thresholds. Overall, longer project alternatives have greater construction emissions than shorter alternatives. Additionally, alternatives with more elevated guideway could have a greater impact because of the extensive construction activity. Therefore, although construction of all HST alternatives would cause a significant impact under CEQA and an impact with substantial intensity under NEPA on air quality, the extent of the impact would vary slightly based on alternative. The UPRR/SR 99 Alternative would have the most impacts, or greatest construction-related emissions. The Hybrid Alternative would have the least impacts, or least construction-related emissions. The BNSF Alternative would have construction-related emissions similar to or slightly less than those under the UPRR/SR 99 Alternative.

Implementation of mitigation measures during construction phases could reduce  $PM_{10}$  and  $PM_{2.5}$  emissions by reducing fugitive dust and exhaust from construction and on-road vehicles. Mitigation measures could also reduce the quantity of other criteria pollutants ( $NO_x$ , VOC, CO) and GHG emissions by controlling exhaust emissions from construction and on-road vehicles.

**Operation:** Operation of the HST alternatives would provide a net regional air quality benefit. Operation of the HST alternatives would generally reduce regional criteria pollutants and GHG emissions and would have a beneficial impact under NEPA and a less than significant impact under CEQA on air quality.

There is no appreciable difference in localized operation impacts among the HST alternatives, except for the operation of the HMF. Operation of the HMF may have the potential to cause a significant localized impact under CEQA and an impact with substantial intensity under NEPA for  $PM_{10}$  and  $PM_{2.5}$  due to the existing exceedance of CAAQS and NAAQS in the project area and the potential for additional local traffic resulting from the HMF sites. In addition, because sensitive receptors located near the HMF facility could potentially be exposed to cancer risks greater than 10 in a million for three of the five HMF sites, HMF TAC emissions could result in a significant health impact under CEQA and an impact of moderate intensity under NEPA to those sensitive receptors. Regarding other emissions, while operation of the HMF (all of them) could cause localized increases in criteria pollutants due to HMF onsite equipment operation, as well as localized CO impacts at intersections near the facility, associated impacts would be less than significant under CEQA and of negligible intensity under NEPA.

Section 3.3.9 provides strategies to reduce potential operational emissions further, as well as measures to avoid or minimize significant localized impacts from the HMF. Implementation of mitigation measures would reduce the exposure of nearby populations from pollutants associated with HMF operations.

#### 3.3.6.2 No Project Alternative

The No Project Alternative represents future year 2035 conditions without the HST Project. The general plans of Merced, Madera, and Fresno counties indicate continued land development and population growth within the region over the next 25 years, which would increase emissions under the No Project Alternative. However, increasingly stringent federal and state emission control requirements and the replacement of older, higher polluting vehicles with newer, less-polluting ones would reduce basin-wide emissions under the No Project Alternative. In addition, SJVAPCD rules and plans have been established to bring the SJVAB into compliance with the NAAQS and CAAQS, which would reduce emissions under the No Project Alternative, notwithstanding this growth. Therefore, air quality is expected to improve in the basin under the No Project Alternative compared to existing conditions.

### 3.3.6.3 High-Speed Train Alternatives

#### **Construction Period Impacts**

##### ***Common Air Quality Impacts***

Common effects are those effects that would occur with implementation of any of the HST alternatives and do not differ depending on the HST alternative chosen. Common effects would include regional emissions from construction and the potential effects of construction on sensitive receptors in proximity to the HST alternatives. Another common effect of construction in general would be to cause or contribute to a localized exceedance of an ambient air quality standard or to affect compliance with air quality plans.

Criteria pollutant emissions were estimated for each year of construction. The HST construction schedule is provided in Chapter 2, Alternatives. The HST construction activities during each calendar year were summed based on the construction schedule. The *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a) provides information on the assumptions for the construction quantities, building square footages, construction equipment fleets for each unit operation, and URBEMIS 2007 files.

The predominant pollutants associated with construction of the alignment, guideway, stations, and maintenance facilities are fugitive dust emissions (PM<sub>10</sub> and PM<sub>2.5</sub>) from earthmoving and disturbed earth surfaces, and combustion pollutants, particularly O<sub>3</sub> precursors (NO<sub>x</sub> and VOC), from heavy equipment and trucks. Construction emissions related to the HST stations, power substations, and maintenance facilities would be the same for all HST alternatives; however, emissions generated from construction of the alignment, including the material hauled to the site and the regional roadway realignment construction emissions, would vary among HST alternatives. The main difference in construction emissions among the HST alternatives would be from the differences in the length and alignment profiles.

Project alternative impacts vary by pollutant and construction year. Of the three alternatives, the UPRR/SR 99 Alternative would result in the highest amount of total emissions during the construction phase; the BNSF Alternative would result in the second-highest amount of construction emissions; and the Hybrid Alternative would have the lowest construction emissions.

**NEPA Impacts:** As discussed in detail in the following sections, direct emissions from the construction phase of the HST alternatives would exceed the GC applicability thresholds for VOC and NO<sub>x</sub>, and therefore trigger the need for a GC compliance demonstration for these pollutants for all calendar years in which emissions exceed the thresholds. VOC and NO<sub>x</sub> emissions are therefore considered to have the potential to cause air quality impacts with substantial intensity during project construction. GC thresholds would not be exceeded for any of the other criteria pollutants, and the potential impacts of the HST alternatives related to these pollutants are therefore considered to be of negligible intensity.

During construction, programmatic emissions reduction measures would be applied as part of the project, including watering exposed surfaces and unpaved roads three times daily, reducing vehicle speeds on unpaved roads to 15 mph, and ensuring that haul trucks are covered. With implementation of these program measures, VOC and NO<sub>x</sub> impacts would still exceed GC thresholds for most of the construction period. Purchase of offset emissions through a Voluntary Emission Reduction Agreement (VERA) with the SJVAPCD (mitigation measure AQ-MM #4) for these pollutants would reduce impacts to negligible intensity after mitigation.

**CEQA Impacts:** Emissions from construction would exceed the SJVAPCD CEQA thresholds for VOC and NO<sub>x</sub>. Therefore, construction emissions of these pollutants may cause significant impacts on air quality under CEQA and may impede or obstruct implementation of the 8-hour SJVAPCD 2007 Ozone Plan or the 2004 Extreme Ozone 1-hour Plan<sup>3</sup>. Operation of concrete batch plants could also cause localized

<sup>3</sup> The 1-hour ozone standard was revoked by the EPA effective June 15, 2005, for areas including the SJVAB. However, EPA still approved the 2004 Extreme Ozone Plan for 1-hour ozone on March 8, 2010 (SJVAPCD 2010b).



particulate matter impacts. There is no CEQA threshold for SO<sub>2</sub> from SJVAPCD; however, SO<sub>2</sub> impacts are expected to be less than significant due to the state requirement of using ultra-low sulfur diesel.

With onsite mitigation, VOC and NO<sub>x</sub> impacts would be reduced but would remain significant for most of the construction phase under CEQA. Purchase of offset emissions through a VERA with the SJVAPCD (mitigation measure AQ-MM #4) for these pollutants would reduce impacts to less than significant after mitigation. Local impacts from concrete batch plants would be reduced to negligible and less than significant by locating them at least 1,000 feet from sensitive land uses.

Construction-phase impacts were evaluated starting in 2013. Future natural growth, including improvements not associated with the HST Project, was not considered in the project construction impacts analysis. Therefore, the construction-phase impacts are in comparison to both the No Project Alternative and existing conditions.

**UPRR/SR 99 Alternative Impacts**

The UPRR/SR 99 Alternative has two options for the wye locations: Ave 21 and Ave 24. Both wye options were evaluated, and Ave 24 Wye emissions were generally higher than Ave 21 Wye emissions. The emissions for construction of the UPRR/SR 99 Alternative with both wye options are included in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

Table 3.3-7 presents the emissions with programmatic and regulatory required control measures for all years of construction. Mitigated emissions after implementing additional mitigation measures beyond regulatory requirements and comparisons to the thresholds are shown in Table 3.3-29, in Section 3.3.9.1, CEQA and NEPA Levels of Impact after Mitigation/Impacts Summary.

**Table 3.3-7**

UPRR/SR 99 Alternative Programmatic Construction Emissions for Years 2013–2022 (tons/year)

Activities	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub> <sup>c</sup>	PM <sub>2.5</sub> <sup>c</sup>
SJVAPCD annual CEQA significance thresholds <sup>a</sup>	10	NA	10	N/A	15	15
Annual GC thresholds applicable to the SJVAB <sup>b</sup>	10	100	10	100	100	100
<b>Year 2013</b>						
Exceeds SJVAPCD CEQA thresholds?	No	N/A	Yes	N/A	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2014</b>						
Exceeds SJVAPCD CEQA thresholds?	Yes	NA	Yes	NA	No	No
Exceeds GC threshold?	Yes	No	Yes	No	No	No
<b>Year 2015</b>						
Exceeds SJVAPCD CEQA thresholds?	Yes	NA	Yes	NA	No	No
Exceeds GC threshold?	Yes	No	Yes	No	No	No
<b>Year 2016</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2017</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No



Activities	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub> <sup>c</sup>	PM <sub>2.5</sub> <sup>c</sup>
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2018</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2019</b>						
Exceeds SJVAPCD CEQA thresholds?	Yes	NA	Yes	NA	No	No
Exceeds GC threshold?	Yes	No	Yes	No	No	No
<b>Year 2020</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2021</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	No	NA	No	No
Exceeds GC threshold?	No	No	No	No	No	No
<b>Year 2022</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	No	NA	No	No
Exceeds GC threshold?	No	No	No	No	No	No
<p>NA = not applicable</p> <p><sup>a</sup> The SJVAPCD has significance thresholds for NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and ROG/VOC. The district currently does not have thresholds for CO and SO<sub>2</sub>. Section 3.3.4.10 summarizes the CEQA significance for these pollutants.</p> <p><sup>b</sup> The GC thresholds for criteria pollutants are based on the SJVAB federal attainment status. The SJVAB is considered in extreme nonattainment for the O<sub>3</sub> NAAQS, is a nonattainment area for PM<sub>2.5</sub>, and is a maintenance area for the CO and PM<sub>10</sub> NAAQS.</p> <p><sup>c</sup> PM<sub>10</sub> and PM<sub>2.5</sub> emissions have incorporated the SJVAPCD Regulation VIII requirements and dust control measures the Authority committed to in the 2005 Statewide Program EIR/EIS.</p>						

**NEPA Impacts:** The UPRR/SR 99 Alternative construction emissions would exceed the GC threshold for NO<sub>x</sub> from 2013 through 2020. VOC GC thresholds would be exceeded in 2014, 2015 and 2019. All other emission rates are predicted to be below the GC thresholds for all years of analysis. Air quality impacts under NEPA would be of substantial intensity for these pollutants because emissions would exceed both the CEQA and GC thresholds. Air quality impacts of other pollutants would be of negligible intensity.

**CEQA Impacts:** NO<sub>x</sub> CEQA thresholds would be exceeded from 2013 through 2020. VOC CEQA thresholds would be exceeded in 2019. Impacts would be significant for these pollutants in these years, respectively. All other emission rates are predicted to be below the CEQA thresholds for all years of analysis, so impacts would be less than significant.

**BNSF Alternative Impacts**

The BNSF Alternative has two options for the wye locations: Ave 21 and Ave 24. Both wye options were evaluated, and Ave 24 Wye emissions were generally higher than Ave 21 Wye emissions for the entire construction duration. The emissions for construction of the BNSF Alternative with both wye options are included in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).



Table 3.3-8 compares the emissions with programmatic and regulatory required control measures with applicable significant thresholds for all construction years.

**Table 3.3-8**  
BNSF Alternative Programmatic Construction Emissions for Years 2013–2022 (tons/year)

Activities	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub> <sup>c</sup>	PM <sub>2.5</sub> <sup>c</sup>
SJVAPCD annual CEQA significance thresholds <sup>a</sup>	10	NA	10	NA	15	15
Annual GC thresholds applicable to the SJVAB <sup>b</sup>	10	100	10	100	100	100
<b>Year 2013</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2014</b>						
Exceeds SJVAPCD CEQA thresholds?	Yes	NA	Yes	NA	No	No
Exceeds GC threshold?	Yes	No	Yes	No	No	No
<b>Year 2015</b>						
Exceeds SJVAPCD CEQA thresholds?	Yes	NA	Yes	NA	No	No
Exceeds GC threshold?	Yes	No	Yes	No	No	No
<b>Year 2016</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2017</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2018</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2019</b>						
Exceeds SJVAPCD CEQA thresholds?	Yes	NA	Yes	NA	No	No
Exceeds GC threshold?	Yes	No	Yes	No	No	No
<b>Year 2020</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2021</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	No	NA	No	No
Exceeds GC threshold?	No	No	No	No	No	No

Activities	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub> <sup>c</sup>	PM <sub>2.5</sub> <sup>c</sup>
<b>Year 2022</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	No	NA	No	No
Exceeds GC threshold?	No	No	No	No	No	No
NA = not applicable <sup>a</sup> The SJVAPCD has significance thresholds for NO <sub>x</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> , and ROG/VOC. The district currently does not have thresholds for CO. Section 3.3.4.10 summarizes the CEQA significance for these pollutants. <sup>b</sup> The GC thresholds for criteria pollutants are based on the SJVAB federal attainment status. The SJVAB is considered in extreme nonattainment for the O <sub>3</sub> NAAQS, is a nonattainment area for PM <sub>2.5</sub> , and is a maintenance area for the CO and PM <sub>10</sub> NAAQS. <sup>c</sup> PM <sub>10</sub> and PM <sub>2.5</sub> emissions have incorporated the SJVAPCD Regulation VIII requirements and dust control measures the Authority committed to in the 2005 Statewide Program EIR/EIS.						

**NEPA Impacts:** The BNSF Alternative construction emissions would exceed the GC threshold for NO<sub>x</sub> from 2013 through 2020. VOC GC thresholds would be exceeded in 2014, 2015 and 2019. All other emission rates are predicted to be below the GC thresholds for all years of analysis. Air quality impacts under NEPA would be of substantial intensity for these pollutants because emissions exceed both the CEQA and GC thresholds. Air quality impacts of other pollutants would be of negligible intensity.

**CEQA Impacts:** NO<sub>x</sub> CEQA thresholds would be exceeded in 2013 through 2020. VOC CEQA thresholds would be exceeded in 2014, 2015, and 2019. These impacts would be significant in these years for these pollutants. All other emission rates are predicted to be below the CEQA thresholds for all years of analysis, so impacts would be less than significant.

**Hybrid Alternative Impacts**

The Hybrid Alternative has two options for the wye connections: Ave 21 and Ave 24. Both wye options were evaluated, and Ave 21 Wye emissions were generally higher than Ave 24 Wye emissions for the entire construction duration. The emissions for construction of the Hybrid Alternative with both wye options are included in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

Table 3.3-9 presents the emissions with programmatic and regulatory control measures for all construction years and comparison with the GC thresholds or the SJVAPCD CEQA thresholds. Conclusions in Table 3.3-9 apply to both options of the Hybrid Alternative.

**Table 3.3-9**  
Hybrid Alternative Programmatic Construction Emissions for Years 2013–2022 (tons/year)

Activities	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub> <sup>c</sup>	PM <sub>2.5</sub> <sup>c</sup>
SJVAPCD annual CEQA significance thresholds <sup>a</sup>	10	NA	10	NA	15	15
Annual GC thresholds applicable to the SJVAB <sup>b</sup>	10	100	10	100	100	100
<b>Year 2013</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No

Activities	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub> <sup>c</sup>	PM <sub>2.5</sub> <sup>c</sup>
<b>Year 2014</b>						
Exceeds SJVAPCD CEQA thresholds?	Yes	NA	Yes	NA	No	No
Exceeds GC threshold?	Yes	No	Yes	No	No	No
<b>Year 2015</b>						
Exceeds SJVAPCD CEQA thresholds?	Yes	NA	Yes	NA	No	No
Exceeds GC threshold?	Yes	No	Yes	No	No	No
<b>Year 2016</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2017</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2018</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2019</b>						
Exceeds SJVAPCD CEQA thresholds?	Yes	NA	Yes	NA	No	No
Exceeds GC threshold?	Yes	No	Yes	No	No	No
<b>Year 2020</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	Yes	NA	No	No
Exceeds GC threshold?	No	No	Yes	No	No	No
<b>Year 2021</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	No	NA	No	No
Exceeds GC threshold?	No	No	No	No	No	No
<b>Year 2022</b>						
Exceeds SJVAPCD CEQA thresholds?	No	NA	No	NA	No	No
Exceeds GC threshold?	No	No	No	No	No	No
NA = not applicable <sup>a</sup> The SJVAPCD has significance thresholds for NO <sub>x</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> , and ROG/VOC. The district currently does not have thresholds for CO. Section 3.3.4.10 summarizes the CEQA significance for these pollutants. <sup>b</sup> The GC thresholds for criteria pollutants are based on the SJVAB federal attainment status. The SJVAB is considered in extreme nonattainment for the O <sub>3</sub> NAAQS, is a nonattainment area for PM <sub>2.5</sub> , and is a maintenance area for the CO and PM <sub>10</sub> NAAQS. <sup>c</sup> PM <sub>10</sub> and PM <sub>2.5</sub> emissions have incorporated the SJVAPCD Regulation VIII requirements and dust control measures the Authority committed to in the 2005 Statewide Program EIR/EIS.						

**NEPA Impacts:** The Hybrid Alternative construction emissions would exceed the GC threshold for NO<sub>x</sub> from 2013 through 2020. VOC GC thresholds would be exceeded in 2014, 2015 and 2019. This would result in air quality impacts with substantial intensity because the emissions would exceed both the GC and CEQA thresholds. All other emission rates are predicted to be below the GC thresholds for all years of analysis, therefore, would have impacts of negligible intensity.

**CEQA Impacts:** NO<sub>x</sub> CEQA thresholds would be exceeded from 2013 through 2020. VOC CEQA thresholds would be exceeded in 2014, 2015 and 2019. These impacts would be significant in these years for these pollutants. All other emission rates are predicted to be below the CEQA thresholds for all years of analysis, so would be less than significant.

### **Compliance with Air Quality Plans**

Emissions from project construction would be temporary, occurring for 9 years, from March 2013 through December 2022. However, based on the amount of construction to be completed, construction activities would involve heavy-duty construction equipment and have the potential to cause adverse air quality impacts. VOC and NO<sub>x</sub> emissions would be greater than applicable significance thresholds, which may impede compliance with the 8-hour SJVAPCD 2007 Ozone Plan and the 2004 Extreme Ozone 1-hour Plan<sup>4</sup>.

### **Material Hauling Emissions Outside the SJVAB**

Construction emissions included in the regional impacts analysis considered emissions within the SJVAB. Rail would be constructed using ballast, sub-ballast, and concrete slabs. Sub-ballast and concrete slab would be available within the SJVAB; however, the ballast could potentially be transported from areas outside the SJVAB. A preliminary emission evaluation was conducted for transporting ballast materials from outside the SJVAB to the border of the air basin. Details of the evaluation are presented in Appendix H of the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA, 2012a).

**NEPA Impacts:** The emission results demonstrated that the worst-case emissions from all scenarios would be above the GC thresholds for NO<sub>x</sub> in the South Coast Air Basin for two of the five scenarios analyzed. The emissions for NO<sub>x</sub> in the other air basins (Sacramento Valley Air Basin, San Francisco Bay Area Air Basin, Mojave Air Basin, Alton Sea Air Basin, and the San Joaquin Valley Air Basin: Eastern Kern portion) would be below the GC thresholds for all scenarios. The emissions for all other pollutants would be below the GC thresholds for all scenarios in all air basins. Therefore, under NEPA the material-hauling emissions outside of SJVAB would have air quality impacts of substantial intensity for NO<sub>x</sub> emissions in the South Coast Air Basin but would be of negligible intensity for all other pollutants in these air basins. Under NEPA the material hauling emissions would have air quality impacts of negligible intensity for all pollutants in the other air basins. Mitigation measures to reduce the material-hauling emission impacts are discussed in Section 3.3.9.

**CEQA Impacts:** Emissions would exceed the SCAQMD CEQA thresholds for NO<sub>x</sub> for four of the scenarios and would exceed Bay Area AQMD's CEQA thresholds for 2 of the scenarios. Therefore, NO<sub>x</sub> emissions would have a significant impact in SCAQMD and BAAQMD. Material hauling emissions would be below the CEQA thresholds for all other air districts and would have insignificant impacts. Mitigation measures to reduce the material-hauling emission impacts are discussed in Section 3.3.9.

Detailed analysis for material hauling emissions is presented in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

### **Greenhouse Gas Emissions**

Because the time that CO<sub>2</sub> remains in the atmosphere cannot be definitively quantified because of the wide range of time scales in which carbon reservoirs exchange CO<sub>2</sub> with the atmosphere, there is no

<sup>4</sup> The 1-hour ozone standard was revoked by the EPA effective June 15, 2005, for areas including the SJVAB. However, the EPA still approved the 2004 Extreme Ozone Plan for 1-hour ozone on March 8, 2010 (SJVAPCD 2010b).



single value for the half-life of CO<sub>2</sub> in the atmosphere (IPCC 1997). Therefore, the duration that CO<sub>2</sub> emissions from a short-term project (i.e., construction emissions) would remain in the atmosphere is unknown.

**Table 3.3-10**  
 HST Alternatives CO<sub>2</sub>e Construction Emissions (metric tons per year) <sup>a, b</sup>

Year	Alternative		
	UPRR/SR 99	BNSF	Hybrid
2013	5,768	5,584	5,351
2014	17,321	20,377	17,965
2015	16,043	19,018	16,571
2016	14,628	14,775	14,016
2017	6,255	6,210	5,589
2018	2,353	2,353	2,353
2019	11,529	11,529	11,529
2020	5,304	5,304	5,304
2021	4,427	4,427	4,427
2022	977	977	977
<b>Total</b>	<b>84,605</b>	<b>90,556</b>	<b>84,083</b>
<b>Amortization GHG Emissions (averaged over 25 years)</b>			
CO <sub>2</sub> e per Year	3,384	3,622	3,363
<b>Payback of GHG Emissions <sup>d</sup> (months)</b>			
Payback period (project vs No Project)	2 to 4	2 to 4	2 to 4
Payback period (project vs existing condition)	2 to 4	2 to 4	2 to 4

Note: Emissions presented are the higher of the two wye design options. Emission factors for CO<sub>2</sub> do not account for improvements in technology.

<sup>a</sup> The CO<sub>2</sub> emissions for each year of construction are included in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

<sup>b</sup> Project life assumed to be 25 years.

<sup>c</sup> According to EPA, emissions of CH<sub>4</sub> and N<sub>2</sub>O from passenger vehicles are much lower than emissions of CO<sub>2</sub>, contributing in the range of 5 to 6% of the CO<sub>2</sub>-equivalent emissions. In addition, the URBEMIS 2007 model does not estimate CH<sub>4</sub> and N<sub>2</sub>O emissions. Therefore, to account for the CH<sub>4</sub> and N<sub>2</sub>O emissions, the CO<sub>2</sub> emissions were conservatively increased by 5% to calculate the CO<sub>2</sub>-equivalent emissions. This approach for passenger vehicles was assumed to be applicable to all emissions sources evaluated.

<sup>d</sup> Payback periods were estimated by dividing the GHG emissions during construction years by the annual GHG emission reduction during project operation. See Tables 3.3-19 and 3.3-20 for operation GHG emission reduction data. The data range represents the emission changes based on the range of HST ticket price of 50% to 83% of airfare.

Source: EPA (2005b).



As shown in Table 3.3-10, GHG emissions from the construction phase of each alternative were quantified according to the CEQ guidance on considering GHG emissions in NEPA documents (CEQ 2010), because total emissions would be greater than the 25,000 metric tons of CO<sub>2</sub>e. The GHG construction emissions would be less than 0.02% of the total statewide GHG emissions.<sup>6,7</sup> The half-life of CO<sub>2</sub> is not defined, and other GHG pollutants such as N<sub>2</sub>O can remain in the atmosphere for 120 years (IPCC 1997). To conservatively estimate the amortized GHG emissions, the HST Project life is conservatively assumed to be only 25 years (although the actual project life will be much longer) (Barber 2010). The estimated amortized GHG construction emissions for each alternative would be less than 3,700 metric tons CO<sub>2</sub>e per year, as shown in Table 3.3-10. The increase in GHG emissions generated during construction would be offset by the net GHG reductions in operation (because of car and plane trips removed in the Merced to Fresno area) in 2 to 4 months for the UPRR/SR 99, BNSF, and Hybrid alternatives. Operational GHG emissions are presented in Tables 3.3-19 and 3.3-20.

### **Local Impacts**

#### **Asbestos and Lead-based Paint**

The demolition of asbestos-containing materials is subject to the limitations of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations and would require an asbestos inspection. The SJVAPCD's Compliance Division would be consulted before demolition begins. As described in Section 3.10, Hazardous Materials and Wastes, the project would include strict compliance with existing asbestos regulations as part of project design. This would prevent asbestos from being a significant impact under CEQA (SJVAPCD 2002) or an impact with substantial intensity under NEPA.

Merced, Madera, and Fresno counties are designated by California Department of Conservation Division of Mines and Geology (CDMG) as areas likely to contain NOA. However, the specific locations of the counties where project construction would occur are in areas designated not likely to contain NOA (CDMG 2000). Therefore, NOA would not likely be disturbed during construction.

Buildings in the study area might be contaminated with residual lead, which was used as a pigment and drying agent in oil-based paint until the Lead-Based Paint Poisoning Prevention Act of 1971 prohibited such use. If encountered during structure demolitions and relocations, lead-based paint and asbestos will be handled and disposed of in accordance with applicable standards. Section 3.10, Hazardous Materials and Wastes, discusses potential issues concerning lead-based paint during project construction.

#### **Guideway/Alignment Construction**

Sensitive receptors such as schools, daycare centers, hospitals, and residents are located near the construction areas in Merced, Madera, and Fresno counties. During construction, sensitive receptors would be exposed to diesel particulate matter exhaust, which CARB classifies as a carcinogen. Cancer risk from exposure to carcinogens is evaluated based on a long-term (70-year) continuous exposure. The period of construction for the portions of the alignment that run past receptors within these communities would be less than 1 year because it is expected that 1,000 feet of guideway could be constructed in 1 year. This short period of exposure is not comparable to chronic exposure and is not expected to increase the cancer risk to sensitive receptors.

#### **Concrete Batch Plants**

The emissions generated from operation of concrete batch plants are included in the total regional construction emissions for each alternative. The concrete batch plants are estimated to generate 18 tons/year of particulate emissions for the Hybrid Alternative, 20 tons/year for the BNSF Alternative, and 29 tons/year for the UPRR/SR 99 Alternative. The concrete generated would include concrete for the elevated structures (elevated rail) and retaining wall (retained fill rail).

<sup>6</sup> A GHG emission inventory for the SJVAPCD was not available at the time of the release of this document so the comparison was made to the most recent CARB emissions inventory (2006) that estimated the annual CO<sub>2</sub>e emissions in California are about 484 MMT (CARB 2009b).

<sup>7</sup> The value of 0.02% is much lower than the value presented in the DEIS due refined construction information, resulting in lower overall GHG emission rates.



The concrete batch plants would be located along the alignment. According to California EPA and CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (CEPA and CARB 2005), emission impacts at receptors would be greatly reduced by locating a facility 1,000 feet from sensitive receptors. To mitigate localized impacts from the plants, Mitigation Measure AQ-MM#3 would be implemented (see Section 3.3.7, Mitigation Measures). This would require concrete batch plants to be at least 1,000 feet from sensitive receptors, such as schools and hospitals.

### **HMF Construction**

Air emissions associated with construction of the HMF would be small relative to the quantity of emissions from construction of the alignment/guideway. However, unlike construction of the guideway/alignment, which would be spread out over about 65 miles, emissions from HMF construction would be located in one area. TACs, mostly DPM exhaust from construction equipment, and criteria pollutants would be emitted during construction of the HMF.

Impacts of construction of the HMF would be localized; therefore, potential exposure to DPM was evaluated for areas adjacent to the construction site. The majority of the construction emissions would be DPM from diesel construction equipment used for mass site grading, building construction, and the HMF guideway construction. The main health risk concern of DPM is cancer and chronic risks. Cancer risk from exposure to carcinogens is typically evaluated based on a long-term (70-year) continuous exposure, and chronic risks are also typically evaluated for long term exposure. The period of construction for the HMF would be approximately 20 months, spread between 2017 and 2019. This short period of exposure is not expected to increase the cancer risk or non-cancer chronic health risks to sensitive receptors.

**NEPA Impacts:** Under NEPA, the local impact of the HMF construction would be of negligible intensity, because sensitive receptors are not expected to be exposed to long-term DPM emissions during HMF construction to cause substantial cancer or chronic health risks, and the acute risks due to DPM would be minimal.

**CEQA Impacts:** Under CEQA, the local impact of the HMF construction would be less than significant because sensitive receptors are not expected to be exposed to long-term DPM emissions during HMF construction to cause substantial cancer or chronic health risks, and the acute risks due to DPM would be minimal.

### **Project/Operational Impacts**

#### ***Common Air Quality Impacts***

Common benefits to regional air quality would come from a reduction of VMT and airplane emissions, which would reduce criteria, mobile source air toxics, and GHG emissions. Additionally, the project would have the common benefit of meeting a GHG reduction measure identified in the AB 32 scoping plan. At the local level, negligible localized increases of CO and particulates (PM<sub>10</sub> and PM<sub>2.5</sub>) emissions would not cause violations of NAAQS, but the operation of the HMF could increase sensitive receptor exposure to air pollutants.

#### ***Statewide and Regional Impacts***

##### **Statewide Emissions**

Table 3.3-11 summarizes statewide emission changes resulting from the project in 2035 compared to the No Project Alternative. The project is predicted to have a beneficial effect on (i.e., reduce) statewide emissions of all criteria pollutants. The analysis estimated the emission changes due to projected reductions of on-road VMT and intrastate plane travel, and increases in electrical demand (required to power the HST). The reductions of on-road VMT and intrastate plane travel will vary depending upon the price of an HST ticket. The more expensive the ticket relative to other travel modes, the less likely riders will travel by HST, and vice versa. Accordingly, Tables 3.3-11 to 3.3-20 present emissions results using a range. One end of the range is based on HST ticket prices being 50% of the equivalent airfare. The other end of the range is based on HST ticket prices being 83% of airfare.



In the existing condition plus project versus existing condition scenario, the project is also predicted to have a beneficial effect (i.e. reduce) on statewide emissions of all applicable pollutants, compared to the existing scenario (Table 3.3-12). Details of the existing condition plus project analysis are presented in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

**Table 3.3-11**  
 Summary of Estimated 2035 Statewide Emission Burden Changes  
 Project vs. No Project 2035

Project Element	VOC (tons/year)	CO (tons/year)	NO <sub>x</sub> (tons/year)	SO <sub>2</sub> (tons/year)	PM <sub>10</sub> (tons/year)	PM <sub>2.5</sub> (tons/year)
Roadways	-489 to -318	-9,971 to -6,512	-2,618 to -1,710	-55 to -37	-515 to -336	-311 to -201
Airport	-235 to -158	-2,154 to -1,443	-2,884 to -1,932	-200 to -134	-23 to -16	-23 to -15
Energy (Power Plants)	74 to 49	755 to 504	508 to 339	63 to 42	106 to 70	97 to 65
<b>Total</b>	<b>-650 to -427</b>	<b>-11,370 to -7,450</b>	<b>-4,995 to -3,301</b>	<b>-192 to -129</b>	<b>-432 to -281</b>	<b>-237 to -152</b>

Note: The values in the table represent the ranges of emission burden change based on the range of HST ticket price of 50% to 83% of airfare.

**Table 3.3-12**  
 Summary of Estimated 2009 Statewide Emission Burden Changes Existing plus Project Vs Existing Condition

Project Element	VOC (tons/year)	CO (tons/year)	NO <sub>x</sub> (tons/year)	SO <sub>2</sub> (tons/year)	PM <sub>10</sub> (tons/year)	PM <sub>2.5</sub> (tons/year)
Roadways	-1,550 to -1,033	-30,260 to -20,173	-10,556 to -7,037	-36 to -24	-543 to -362	-392 to -261
Airport	-137 to -91	-1,249 to -836	-1,673 to -1,119	-116 to -78	-13 to -9	-13 to -9
Energy (Power Plants)	74 to 49	755 to 504	508 to 339	63 to 42	106 to 70	97 to 65
<b>Total</b>	<b>-1,613 to -1,076</b>	<b>-30,754 to -20,506</b>	<b>-11,721 to -7,818</b>	<b>-89 to -59</b>	<b>-451 to -301</b>	<b>-308 to -205</b>

Note: The values in the table represent the emission changes based on the range of HST ticket price of 50% to 83% of airfare.

**Regional Criteria Pollutant Emissions**

Motor vehicle emissions would decrease in the region because of the project. These reductions, however, would be partially offset by operational emissions associated with the train itself (the HST would be powered by electricity from the regional power grid), by station operations, and by HMF operations. These emissions were analyzed for the No Project Alternative versus the HST alternatives scenario in 2035 and the existing condition versus existing condition plus project scenario in 2009.

As described in the sections below, the project would result in a net regional decrease in emissions of criteria pollutants compared to the No Project with the exception of SO<sub>2</sub>, which would have a small emission increase under the 83% fare scenario (Table 3.3-13). The air quality impacts would be beneficial for all pollutants, except SO<sub>2</sub>, which would have an impact of negligible intensity due to the low background ambient concentrations and overall low project-related emissions of the region. The existing condition plus project would have a net regional emission decrease compared to the existing condition, with the exception of SO<sub>2</sub>, which would experience no change under the 83% fare scenario. (refer to Table 3.3-14). Emission decreases would be beneficial to the air basin and help the SJVAB meet its attainment goals for ozone and particulates. This is true even under with the lower ridership associated with HST fares being at 83% of equivalent air travel – i.e., compared to the 50% scenario – and the project would result in fewer, but still positive, regional benefits.

**Table 3.3-13**  
 Summary of Regional Changes in Operational Emissions  
 Project vs. No Project 2035

Activities	VOC (tons/ year)	CO (tons/ year)	NO <sub>x</sub> (tons/ year)	SO <sub>2</sub> (tons/ year)	PM <sub>10</sub> (tons/ year)	PM <sub>2.5</sub> (tons/ year)
<b>Indirect Emissions</b>						
Changes in VMT emissions	-72.8 to -52.9	-1,430.4 to -969.8	-388.3 to -264.8	-7.7 to 5.1	-79.2 to -52.8	-48.1 to -32.6
Changes in airplane emissions	-0.6 to -0.4	-5.6 to -3.7	-7.5 to -5.0	-0.5 to -0.3	-0.1 to -0.0	-0.1 to -0.0
Changes in power plant emissions <sup>a</sup>	7.4 to 4.9	75.5 to 50.4	50.8 to 33.9	6.3 to 4.2	10.6 to 7.0	9.7 to 6.5
<b>Direct Emissions</b>						
Station operation	1.4	105	8.2	0.63	6.1	3.5
HMF onsite emissions	0.77	10	3.7	0.030	0.14	0.13
HMF offsite mobile source emissions	0.21	12	1.6	0.072	0.70	0.40
Overnight layover/servicing maintenance facility offsite emissions	0.0039	0.30	0.021	0.0018	0.018	0.010
Fugitive dust from train operations	NA	NA	NA	NA	22	3.2
<b>Total <sup>b</sup></b>	<b>-64 to -46</b>	<b>-1,233 to -796</b>	<b>-331 to -222</b>	<b>-1 to 0.5</b>	<b>-62 to - 39</b>	<b>-34 to -22</b>
SJVAPCD CEQA significance thresholds	10	NA	10	NA	15	15
Exceeds SJVAPCD CEQA thresholds? <sup>c</sup>	No	NA	No	NA	No	No
GC thresholds <sup>d</sup>	10	100	10	100	100	100

Activities	VOC (tons/ year)	CO (tons/ year)	NO <sub>x</sub> (tons/ year)	SO <sub>2</sub> (tons/ year)	PM <sub>10</sub> (tons/ year)	PM <sub>2.5</sub> (tons/ year)
Exceeds GC thresholds?	No	No	No	No	No	No
<p>NA = not applicable</p> <p><sup>a</sup> The changes in power plant emissions are presented for the longest alternative.</p> <p><sup>b</sup> The total includes the indirect and direct emissions.</p> <p><sup>c</sup> The SJVAPCD has significance thresholds for NO<sub>x</sub>, ROG/VOC, PM<sub>10</sub>, and PM<sub>2.5</sub>. The district currently does not have thresholds for CO or SO<sub>2</sub>. Section 3.3.4.10 summarizes the CEQA significance for these pollutants.</p> <p><sup>d</sup> The GC thresholds for criteria pollutants are based on the SJVAB federal attainment status. The SJVAB is considered an extreme nonattainment area for the O<sub>3</sub> NAAQS, is a nonattainment area for PM<sub>2.5</sub>, and is a maintenance area for the CO and PM<sub>10</sub> NAAQS.</p> <p><sup>e</sup> The values in the table represent the emission changes based on the range of HST ticket price of 50% to 83% of airfare.</p>						

**Table 3.3-14**  
Summary of Regional Changes in Operational Emissions  
Existing Plus Project vs. Existing Condition 2009

Activities	VOC (tons/ year)	CO (tons/ year)	NO <sub>x</sub> (tons/ year)	SO <sub>2</sub> (tons/ year)	PM <sub>10</sub> (tons/ year)	PM <sub>2.5</sub> (tons/ year)
<b>Indirect Emissions</b>						
Changes in VMT emissions	-251.6 to -172.4	-4,434.9 to -3,027.0	-3,279.8 to -2,195.8	-7.1 to -4.8	-133.0 to -86.6	-99.3 to -63.2
Changes in airplane emissions	-0.4 to 0.0	-3.2 to 0.0	-4.3 to 0.0	-0.3 to 0.0	0.0 to 0.0	0.0 to 0.0
Changes in power plant emissions <sup>a</sup>	7.4 to 4.9	75.5 to 50.4	50.8 to 33.9	6.3 to 4.2	10.6 to 7.0	9.7 to 6.5
<b>Direct Emissions</b>						
Station operation	21	601	69	0.63	6.3	3.6
HMF onsite emissions	0.77	10	3.7	0.030	0.14	0.13
HMF offsite mobile source emissions	2.4	66	11	0.072	0.74	0.44
Overnight layover/servicing maintenance facility offsite emissions	0.059	1.7	0.18	0.0018	0.018	0.010
Fugitive dust from train operations	NA	NA	NA	NA	22	3.2
<b>Total <sup>b</sup></b>	<b>-220 to -143</b>	<b>-3,684 to -2,298</b>	<b>-3,150 to -2,078</b>	<b>-0.4 to -0.2</b>	<b>-115 to -72</b>	<b>-85 to -53</b>
SJVAPCD CEQA significance thresholds	10	NA	10	NA	15	15
Exceeds SJVAPCD CEQA thresholds? <sup>c</sup>	No	NA	No	NA	No	No



Activities	VOC (tons/ year)	CO (tons/ year)	NO <sub>x</sub> (tons/ year)	SO <sub>2</sub> (tons/ year)	PM <sub>10</sub> (tons/ year)	PM <sub>2.5</sub> (tons/ year)
GC thresholds <sup>d</sup>	10	100	10	100	100	100
Exceeds GC thresholds?	No	No	No	No	No	No

NA = not applicable

<sup>a</sup> The changes in power plant emissions are presented for the longest alternative.

<sup>b</sup> The total includes the indirect and direct emissions.

<sup>c</sup> The SJVAPCD has significance thresholds for NO<sub>x</sub>, ROG/VOC, PM<sub>10</sub>, and PM<sub>2.5</sub>. The district currently does not have thresholds for CO or SO<sub>2</sub>. Section 3.1.8 summarizes the CEQA significance for these pollutants.

<sup>d</sup> The GC thresholds for criteria pollutants are based on the SJVAB federal attainment status. The SJVAB is considered an extreme nonattainment area for the O<sub>3</sub> NAAQS, is a nonattainment area for PM<sub>2.5</sub>, and is a maintenance area for the CO and PM<sub>10</sub> NAAQS.

<sup>e</sup> The values in the table represent the emission changes based on the range of HST ticket price of 50% to 83% of airfare.

### Mobile Source Emissions

The project would decrease VMT from other modes of travel (passenger cars, buses, diesel trains, and airports) and their associated emissions. The 2005 Statewide Program EIR/EIS (Authority and FRA 2005) demonstrated that the overall statewide project would reduce long-distance, city-to-city travel along freeways and state highways within the SJVAB and would reduce long-distance, city-to-city aircraft take-offs and landings within the air basin.

As a result of the HST Project, some vehicles may need to travel additional distances to cross the HST track on new roadway overpasses. On average, roadway overpasses would be provided approximately every 2 miles along the track. It is estimated that the proposed project would result in no more than 1 mile of out-of-direction travel for vehicles to cross the HST tracks. The width of the roadway overpasses would accommodate both farm equipment and school buses traveling in opposite lanes. Due to this frequency of roadway overpasses, additional distances traveled by vehicles to cross the HST tracks are expected to be negligible relative to regional VMT reductions; therefore, this is not discussed further in the analysis.

At the regional level, the air quality analysis is based primarily on regional VMT. According to the traffic analysis, all the HST alternatives would have the same regional VMT effects (Authority and FRA 2011). Therefore, the HST alternatives would have the same regional impact on air quality.

The regional VMT for the HST alternatives would decrease by about 10 to 7% compared to the No Project Alternative (2035) and about 2% compared to existing conditions based on the ticket price of 50% to 83% airfare. These reductions would result in lower pollutant emissions. Therefore, according to NEPA, and under CEQA guidelines, there would be a beneficial impact on air quality from the operation of regional on-road vehicles for the HST alternatives.

Despite overall projected VMT growth between existing conditions and the no project conditions in 2035, emission factors for 2035, which take into account improved technology designed to meet higher emission standards in the future, would be lower than existing values. Regional on-road vehicle emissions for 2035 with the UPRR/SR 99, BNSF, and Hybrid alternatives would be less than emissions estimated under existing conditions.

**NEPA Impacts:** Under NEPA, there would be a benefit to regional air quality from operation of the HST,

**CEQA Impacts:** Under CEQA, operational air quality effects would be beneficial because of the reduction of VMT in the region.

Table 3.3-13 summarizes the reduction in VMT and criteria pollutant emissions in the regional study area between the 2035 No Project Alternative and the 2035 Project Alternative based on travel mode

projections developed for the project. Table 3.3-14 summarizes the reduction in criteria pollutant emissions in the regional study area between the 2009 existing condition and the 2009 existing condition plus project scenario based on travel mode projections of VMT developed for the project. Details of the VMT comparison of the HST alternatives to existing conditions are included in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

### Emissions from Train Operations

The HST Project would use electric multiple unit (EMU) trains, with the power distributed through the overhead contact system. Direct emissions from combustion of fossil fuels and from HST trains would not occur. However, trains traveling at high velocities, such as those associated with the proposed HST, create sideways turbulence and rear wake, which re-suspend particulates from the surface surrounding the track, resulting in fugitive dust emissions. Assuming a friction velocity of 0.19 meter/second (m/s) to re-suspend soils in the project region, an HST passing at 220 mph could re-suspend soil particles out to approximately 10 feet from the train (Watson 1996). According to EPA methodology for estimating emissions from wind erosion (EPA 2006b), HST operations would generate approximately 22 tons per year of PM<sub>10</sub> and 3.2 tons per year of PM<sub>2.5</sub>. These emissions would be the same for the 2035 No Project Alternative compared to the HST alternatives and the 2009 existing condition compared to the 2009 existing condition plus project scenario (refer to Tables 3.3-13 and 3.3-14).

Fresno and Merced Counties, as well as the San Joaquin Valley region in general, have higher rates of asthma in adults and children. Because the HST is electrically powered, it is not expected to generate direct combustion emissions along its route that cause substantial health concerns such as asthma or other respiratory diseases in the project area. In addition, a detailed analysis of wind-induced fugitive dust emissions due to HST travel is discussed in Appendix 3.3-A. Based on this analysis, fugitive dust emissions due to HST travel are not expected to result in substantial amount of dust to cause health concerns in the project area.

### Emissions from Power Generating Facilities

The HST Project would increase electrical requirements compared to the No Project Alternative and existing conditions. Analysts conservatively estimated the electrical demands resulting from the propulsion of the trains to be 16.55 to 11.04 gigawatt hours per day (corresponding to the ticket price range 50% or 83% of airfare) compared to the No Project Alternative in 2035 and for the existing plus project compared to the existing condition in 2009. The state's electrical grid would power the HST System; therefore, no one generation source for the electrical power requirements can be identified. Project-related emission changes from power generation were, therefore, predicted on a statewide level only. To derive the portion of electricity usage required by the Merced to Fresno Section of the HST, the electricity usage is assumed to be proportional to the track alignment length. The alignment distance for each alternative was divided by the total HST distance to estimate the percentages of the statewide electricity consumed by each alternative. Tables 3.3-13 and 3.3-14 provide the emissions estimated for the Merced to Fresno Section for the project compared to No Project in 2035 and existing condition in 2009, respectively.

The estimated emission changes shown in Table 3.3-13 and Table 3.3-14 represent the portion of the emissions generated by HST electricity usage allocated to the SJVAB based on the alignment distance within the SJVAB. The state of California requires that an increasing fraction (33% by 2020) of the electricity generated for the state's power portfolio come from renewable energy sources. As such, the emissions generated for powering the HST System are expected to be lower in the future compared to the emission estimates used in this analysis based on existing state power portfolio. In addition, the Authority has adopted a goal to purchase the HST System's power from renewable energy sources, which would further reduce the emissions compared to the existing estimates.

### Airport Emissions

The HST Project is projected to affect travel at four regional airports in the study area: Fresno Yosemite International Airport, Merced Municipal/Macready Field Airport, Chowchilla Municipal Airport, and Madera Municipal Airport. The 2005 Statewide Program EIR/EIS (Authority and FRA 2005) demonstrated that the



long-distance, city-to-city aircraft take-offs and landings within the Merced to Fresno Section would reduce by about one flight per day. This would reduce regional airport-related emissions of CO and NO<sub>x</sub> relative to the No Project Alternative and existing conditions. Table 3.3-13 and Table 3.3-14 summarize the estimated effects of this reduction relative to the No Project Alternative and to existing conditions, respectively. Details of the aircraft comparison of the HST alternatives to existing conditions are included in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

### Station Emissions

Emissions associated with the operation of the Merced and Fresno HST stations are expected as a result of combustion sources used primarily for space heating and facility landscaping (backup emergency generators), energy consumption for facility lighting, minor solvent and paint usage, and employee and passenger traffic. Deliveries to the HST stations were considered negligible. URBEMIS 2007, refined as discussed in Section 3.3.4.9, was used to estimate these emissions from each station, based on the square footage of the stations. Table 3.3-13 and Table 3.3-14 summarize the annual emissions from the stations for 2035 and 2009 conditions, respectively.

### HMF Emissions

Typical activities expected at the HMF include in-service monitoring, inspections and testing, toilet servicing, train car washing, minor and major repair of mechanical components, exterior maintenance (grinding, painting, and cutting activities), parts cleaning, heating, ventilation, and air-conditioning repair, welding, and fabrication. As site-specific information for all activities at the HMF is not available at this time, reasonable assumptions were made based on the types of activities that would occur at the facility, and emissions from these emissions sources as well as from mobile sources operating onsite were estimated based on these assumptions. The emissions from the HMF are compared to the GC thresholds and are presented in Tables 3.3-13 and 3.3-14 for the No Project Alternative compared to the HST alternatives and the existing plus project compared to the existing conditions, respectively.

Air dispersion modeling was performed to determine the potential impact on local air quality and is discussed in the local impacts section. The stationary sources required for the HMF operation would require permits from the SJVAPCD unless they are exempt. Evaluation of applicable permitting requirements and the subsequent emission estimates for permitting purposes will be performed during permitting processes thus are not discussed in this report. Details of the sources associated with the HMF are included in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

### Mobile Source Air Toxics Analysis

This MSAT analysis is a qualitative comparison between HST alternatives. An MSAT impact would occur if an HST alternative has a higher potential for MSAT emissions than the No Project Alternative or existing conditions. The MSAT analysis indicated that the impacts from MSAT emissions are similar for the three HST alternatives. Because there would be no increase in MSAT as a result of the HST Project (and may actually be a reduction), under NEPA, the HST alternatives would have an impact with negligible intensity and under CEQA, the MSAT impact would be less than significant.

#### No Project Alternative

MSAT emissions from the No Project Alternative in 2035 would likely be lower than existing conditions as a result of EPA's national control programs that would reduce annual MSAT emissions by 72% from 1999 to 2050 (FHWA 2009). Local conditions may differ from these national projections in terms of fleet mix and turnover, VMT growth rates, and local control measures. However, the magnitude of the EPA-projected reductions is so great (even after accounting for VMT growth) that MSAT emissions in the study area would likely be lower in the future when compared to existing conditions.

#### HST Alternatives

The HST Project would provide another option for intercity travel in California that does not emit air pollutants, including MSATs, into the local atmosphere. The Merced to Fresno Section of the HST would decrease overall VMTs from passenger vehicles compared to the No Project Alternative and the existing conditions, thus decrease MSATs associated with passenger vehicles. MSATs would also decrease

because of a reduction in travel modes involving diesel and aviation fuel (buses, diesel Amtrak trains, and airplanes).

The HST alternatives would reduce traffic congestion and increase vehicle speed as more people use the HST instead of driving when compared to the No Project Alternative. According to EPA's MOBILE6.2 model (EPA 2006c), emissions of priority MSATs, except for diesel PM, decrease as speed increases (EPA 2009). Therefore, the HST alternatives would decrease MSAT emissions compared to the No Project Alternative. HST alternatives would reduce regional VMT by 10% to 7% from existing conditions based on the ticket price of 50% to 83% airfare; therefore, MSAT emissions from the HST alternatives would similarly decrease MSAT emissions to existing conditions. The project will have a beneficial impact on regional MSAT emissions.

The operation of the EMU used by HST alternatives would not have combustion emissions, so no toxic emissions would be expected from operation of the HSTs. The potential MSAT emission sources directly related to the project operation would be from vehicles used at maintenance facilities and the passenger vehicles travelling to and from the HST stations. Buses serving the stations would be mostly fuelled by natural gas and would not generate a substantial amount of diesel PM emissions. Localized increases in MSAT emissions may occur near the HST stations because of passenger commutes and near the HMF, where diesel vehicles would be used.

This evaluation includes a basic analysis of the likely MSAT emission impacts of the HST alternatives. The lack of a national consensus on an acceptable level of risk and other air quality criteria assumed to protect the public health and welfare, as well as the reliability of available technical tools, do not allow predicting, with confidence, the project-specific health impacts of the emission changes associated with the alternatives (FHWA 2009). The outcome of such an assessment would be influenced more by the uncertainty introduced into the process by the assumptions made rather than insight into the actual health impacts from MSAT exposure directly attributable to the HST alternatives (FHWA 2009). As reductions in MSAT emissions are predicted with the HST alternatives, further MSAT analysis would not be suggested even if it were practical to accomplish.

### Greenhouse Gas Analysis

The SJVAPCD released a guidance document in December 2009 for addressing GHG impacts within the context of CEQA. For projects to have a less than significant impact on an individual and cumulative basis, the project must comply with an approved Climate Change Action Plan, demonstrate that it would not impede the state from meeting the statewide 2020 GHG emissions target, adopt the SJVAPCD's Best Performance Standards for stationary sources, or reduce or mitigate GHG emissions by 29% (SJVAPCD 2009b).

The HST Project, which is included in the AB 32 scoping plan as Measure #T-9, would help the state meet the 29% reduction in GHG emissions by 2020 (CARB 2008). Overall, the project operation would have a net beneficial impact on GHG emissions. Table 3.3-15 summarizes the statewide GHG emission changes from the No Project Alternative (expressed in terms of CO<sub>2</sub>) resulting from the operation of the project. As shown, the project would have a beneficial effect on statewide GHG emissions. The analysis estimated the emission changes from reduced on-road VMT, reduced intrastate plane travel, and increased electrical demand. Operation of the HST Project would not have an impact of substantial intensity on the current water supply system for the area around the project, nor would it have any measurable impact on the state's water supply system as a whole. Because the project would convert water-using agricultural land to non-water-using HST track, predominantly, water use and associated GHG emissions from pumping water would decrease.



**Table 3.3-15**  
 2035 Estimated Statewide GHG Emission Changes  
 (Project vs. No Project) (MMT/year)

Project Element	Change in CO <sub>2</sub> Emissions
Roadways	-5.4 to -3.5
Airports	-0.530 to -0.36
Energy	2.0 to 1.3
<b>Total</b>	<b>-3.9 to -2.5</b>
Note: Totals may not add up exactly because of rounding. The values in the table represent the ranges emission changes based on the range of HST ticket prices of 50% to 83% of airfare	

As compared to existing conditions of 2009, the HST alternatives would reduce GHG emissions due to the reduction in VMT. Table 3.3-16 presents the statewide GHG emission changes for the existing condition plus project compared to existing conditions (expressed in CO<sub>2</sub>). The decrease in statewide GHG emissions is a result of reduced on-road miles traveled, reduced intrastate plane travel, and increased electrical demand compared to existing conditions.

Details of the GHG comparison of the HST alternatives to existing conditions are included in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

**Table 3.3-16**  
 2009 Estimated Statewide GHG Emission Changes  
 (Existing Plus Project vs. Existing Condition) (MMT/year)

Project Element	Change in CO <sub>2</sub> Emissions
Roadways	-4.0 to -2.6
Airports	-0.3 to -0.2
Energy	2.0 to 1.3
<b>Total</b>	<b>-2.3 to -1.5</b>
Note: Totals may not add up exactly because of rounding. The values in the table represent the ranges emission changes based on the range of HST ticket prices of 50% to 83% of airfare	

On-Road Vehicles

The HST alternatives would reduce statewide daily roadway VMT by more than 30 million miles because of travelers using the HST rather than driving. This equates to approximately 15,800 tons of CO<sub>2</sub> per day, or approximately 33,000 barrels of oil consumed per day. As shown in Tables 3.3-15 and 3.3-16, the proposed project would reduce statewide GHG emissions compared to the No Project Alternative and existing conditions, respectively.

On a regional basis, under the HST alternatives, Fresno and Merced counties would have some of the larger VMT reductions in the state. As shown in Table 3.3-17, annual on-road vehicle GHG emissions would be lower than the No Project Alternative emissions for the design year for the Merced to Fresno





Section and would contribute to an overall reduction throughout the state. Table 3.3-18 presents the reduction in annual on-road vehicle GHG emissions for the existing condition plus project compared to the existing condition in 2009.

**Table 3.3-17**  
 2035 On-Road Vehicles Regional GHG Emissions (Project vs. No Project)

County	No Project Daily VMT Total Traffic	HST Alternative Daily VMT Total Traffic	Change in CO <sub>2</sub> Emissions with HST (MMT/year)
Fresno	27,368,000	24,364,000 to 25,366,000	-0.480 to -0.33
Madera	8,533,000	8,257,000 to 8,349,000	-0.05 to -0.04
Merced	13,534,000	12,018,000 to 12,524,000	-0.26 to -0.18
Statewide	1,254,604,000	1,223,331,000 to 1,233,755,000	-5.4 to -3.5

Note: Totals may not add up exactly because of rounding.

The values in the table represent the ranges emission changes based on the range of HST ticket prices of 50% to 83% of airfare

**Table 3.3-18**  
 2009 On-Road Vehicles Regional GHG Emissions (Existing Plus Project vs. Existing Condition)

County	Existing Condition Daily VMT Total Traffic	Existing Plus Project Daily VMT Total Traffic	Change in CO <sub>2</sub> Emissions with HST (MMT/year)
Fresno	22,500,000	20,030,000 to 20,850,000	-0.46 to -0.32
Madera	4,200,000	4,060,000 to 4,110,000	-0.03 to -0.02
Merced	7,000,000	6,220,000 to 6,480,000	-0.18 to -0.12
Statewide	888,400,000	866,260,000 to 873,640,000	-4.0 to -2.7

Note: Totals may not add up exactly because of rounding.

The values in the table represent the ranges emission changes based on the range of HST ticket prices of 50% to 83% of airfare

Airport Operations

The HST Project would reduce the number of plane flights statewide, because of travelers using the HST rather than flying. Therefore, the project would have no measurable effect or it would slightly reduce regional emissions because of the HST (compared to the No Project Alternative). The 2005 Statewide Program EIR/EIS (Authority and FRA 2005) demonstrated that the long-distance, city-to-city aircraft take-offs and landings within the Merced to Fresno Section would reduce by about one flight per day. This would reduce regional airport-related emissions of CO<sub>2</sub> emissions relative to the No Project Alternative, as shown in Table 3.3-19.

The existing condition plus project compared to the existing condition would also reduce the long-distance, city-to-city airport take-offs and landings within the Merced to Fresno Section by one flight per day. This would reduce regional airport-related emissions of CO<sub>2</sub> emissions from the existing condition plus project compared to the existing condition, as shown in Table 3.3-20.

Power Plant Operations

The HST would increase electrical requirements compared to the No Project Alternative and the existing condition. The electrical demands from propulsion of the trains and the operation of the trains at terminal stations, in storage depots, and in maintenance facilities were conservatively estimated to be 16.55 gigawatt hours per day under the 50% fare scenario and 11.04 gigawatt hours per day under the 83% fare scenario. As shown in Tables 3.3-15 and 3.3-16, the project would increase statewide indirect GHG emissions.

To derive the portion of electricity usage required by the Merced to Fresno Section of the HST, the electricity usage is assumed to be proportional to the track alignment length. The alignment distance for each alternative was divided by the total HST distance of 830 miles to estimate the percentages of the statewide electricity consumed by each alternative. Table 3.3-19 summarizes the regional indirect CO<sub>2</sub> emissions compared to No Project Alternative for the Merced to Fresno Section. Table 3.3-20 summarizes the regional indirect CO<sub>2</sub> emissions for the existing condition plus project compared to the existing condition.

The state’s electrical grid would power the HST System, and, therefore, no one generation source for the electrical power requirements can be identified. The estimated emission changes for power plants are considered conservative because they are based on the current electric generation profile of the state. As previously discussed, the state requires an increasing fraction (33%) of electricity generated for the state’s power portfolio to come from renewable energy sources and the Authority has a policy goal to use 100% renewable energy plus power the HST. As such, the GHG emissions generated for powering the HST System are expected to be lower in the future compared to emission estimates used in this analysis.

HST Station and HMF Operations

Operation of the HST would result in GHG emissions from combustion of fossil fuels through onsite sources used and offsite mobile sources used for employee commutes and vendor trips to maintenance facilities and HST stations. No direct GHG emissions would result from operation of the trains on the alignment because the trains would be electrically powered. The operation of the train would only result in indirect GHG emissions from energy consumption, as discussed in the power plant analysis.

Table 3.3-19 shows the total regional GHG emissions changes from the HST Project operation when compared to the No Project Alternative in 2035. The proposed project would reduce regional GHG emissions when compared to the No Project Alternative in 2035.

**Table 3.3-19**  
 2035 Project Alternatives Regional GHG Emissions (Project vs. No Project) (MMT/year)

2035 Operational Emissions CO <sub>2</sub> <sup>a</sup>	2035 CO <sub>2</sub> Emissions		
	UPRR/SR 99 Alternative	BNSF Alternative	Hybrid Alternative
Regional Merced to Fresno Area Vehicle Travel	-0.80 to -0.54	-0.80 to -0.54	-0.80 to -0.54
Regional Airport (Fresno-Yosemite International)	-0.0014 to -0.0009	-0.0014 to -0.0009	-0.0014 to -0.0009
Indirect Regional Power	0.16 to 0.11	0.18 to 0.12	0.16 to 0.11
HST Station and HMF Operations	0.080	0.080	0.080
Net Regional Difference	-0.56 to -0.35	-0.53 to -0.34	-0.56 to -0.34
<sup>a</sup> Emission factors for CO <sub>2</sub> do not account for improvements in technology.			
<sup>b</sup> The values in the table represent the ranges emission changes based on the range of HST ticket prices of 50% to 83% of airfare			
Totals may not add up exactly because of rounding.			

As previously discussed, there is no defined time for the half-life of CO<sub>2</sub> in the atmosphere. Therefore, it is reasonable to address GHG construction emissions by looking at the payback period. Because of the large reduction of GHG emissions during the operational phase, the GHG emissions from construction would be "paid back," meaning it would offset for the increases in construction emissions, in less than 6 months of the HST operation under the worst-case construction-phase emission scenario. Therefore, the operation and construction of the project would result in a benefit under NEPA and a less-than-significant GHG impact under CEQA when compared to the No Project Alternative.

Table 3.3-20 shows the total regional GHG emissions changes from the HST Project operation when compared to the existing condition in 2009. The existing condition plus project would have a net GHG emission decrease compared to the existing condition.

**Table 3.3-20**  
 2009 Project Alternatives Regional GHG Emissions (Existing Plus Project vs. Existing Condition)  
 (MMT/year)

2009 Operational Emissions CO <sub>2</sub> <sup>a</sup>	2009 CO <sub>2</sub> Emissions		
	UPRR/SR 99 Alternative	BNSF Alternative	Hybrid Alternative
Regional Merced to Fresno Area Vehicle Travel	-0.67 to -0.46	-0.67 to -0.46	-0.67 to -0.46
Regional Airport (Fresno-Yosemite International)	-0.0008 to 0	-0.0008 to 0	0.0008 to 0
Indirect Regional Power	0.16 to 0.11	0.18 to 0.12	0.16 to 0.11
HST Station and HMF Operations	0.08	0.08	0.08
Net Regional Difference	-0.43 to -0.27	-0.41 to -0.25	-0.43 to -0.26
<sup>a</sup> Emission factors for CO <sub>2</sub> do not account for improvements in technology. <sup>b</sup> The values in the table represent the ranges emission changes based on the range of HST ticket prices of 50% to 83% of airfare Totals may not add up exactly because of rounding.			

**Local Impacts**

Local impacts on air quality would occur if the project causes or exacerbates a localized exceedance of a CO or PM ambient air quality standard. The result of the localized analyses, which are the same for all HST alternatives evaluated, is that the project would not cause or exacerbate a violation of a NAAQS and impacts would be of negligible intensity under NEPA and less than significant under CEQA. The operation of the Castle Commerce Center HMF (but none of the other HMF sites) could cause potential impact of moderate intensity under NEPA and significant under CEQA impact on sensitive receptors located within 1,000 feet of the facility boundary.

**Microscale CO Analysis**

The project would not worsen traffic conditions at intersections along the alignment because the alignment and roadways would be grade-separated. Therefore, the CO analysis did not consider every intersection along the alignment; instead, the analysis focused on locations near the HST stations and the HMF and locations that would experience a change in roadway structure (such as closure of existing crossings along the alignment if closure would result in traffic congestion) or traffic conditions. These areas of potential elevated CO concentrations are referred to as hot spots.

CO concentrations were modeled at worst-case intersections near the proposed Merced HST station, the proposed Fresno HST station, the proposed Castle Commerce Center HMF, between Herndon Avenue and Shaw Avenue north of SR 99. Additionally, intersections affected by the realignment and widening of SR 99 and in Roeding Park area were evaluated. The *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a) lists the intersections chosen for analysis, based on peak-hour volumes, delay time, and LOS. Receptors were placed at worst-case locations adjacent to the intersections to calculate maximum 1-hour and 8-hour CO concentrations.

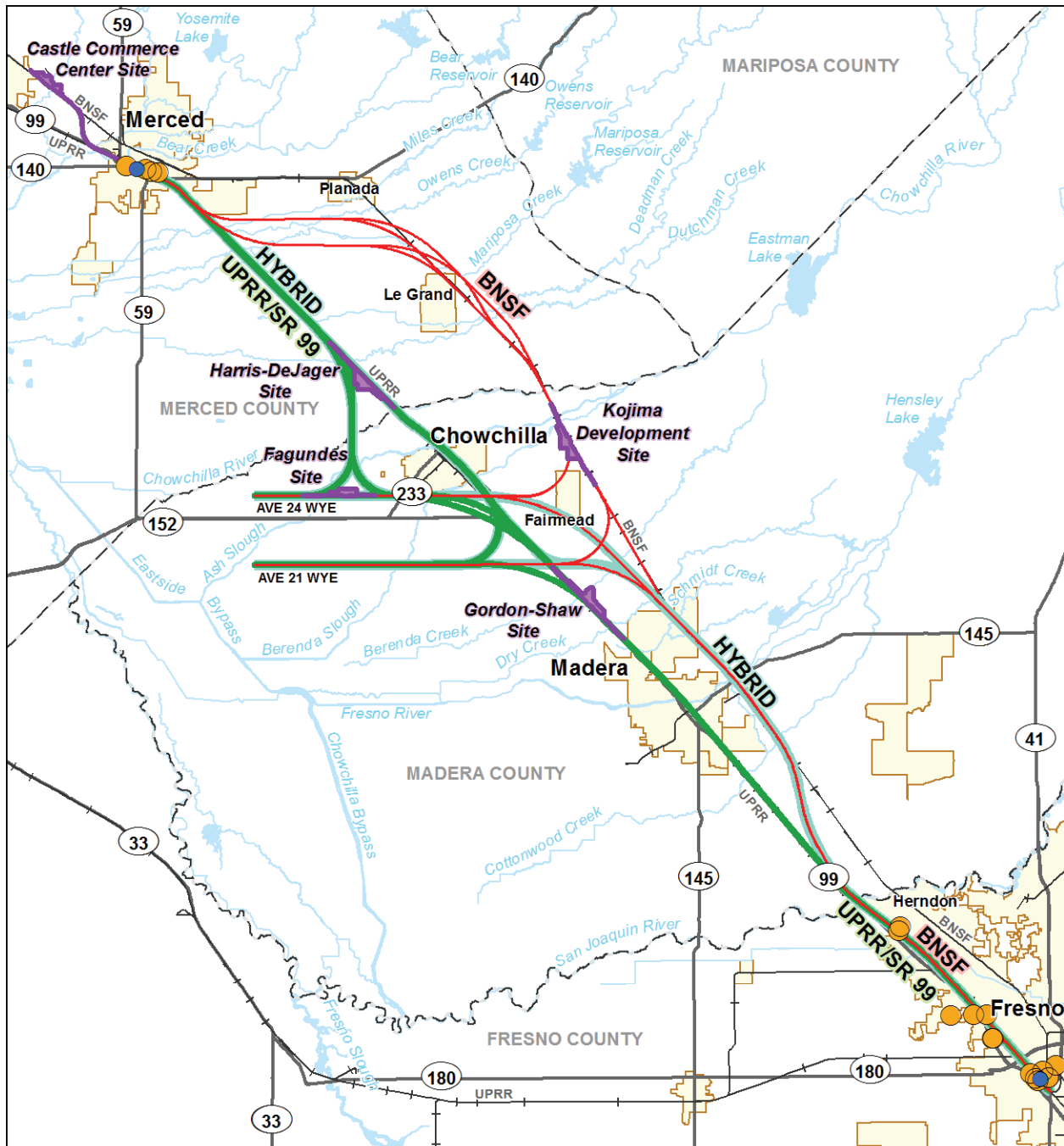
#### *Project vs. No Project*

Intersections modeled in this analysis are signalized, as traffic volumes at the unsignalized intersections in the study area are less than signalized intersections. Figure 3.3-4 shows the intersections included in the CO hot-spot analysis for the Project vs. No Project condition. Table 3.3-21 summarizes the modeled CO concentrations at the intersections around the proposed Merced station and Castle Commerce Center HMF. Table 3.3-22 summarizes the modeled CO concentrations around the Fresno HST station and at the Herndon and Shaw area intersections. Table 3.3-23 summarizes the modeled CO concentrations at the intersections along SR 99.

The results presented in Tables 3.3-21 through 3.3-23 include the HST alternatives as well as the No Project Alternative growth and other transportation improvement projects in the region, as described in Chapter 2, Alternatives. Results in Tables 3.3-21 through 3.3-23 include background concentrations of CO. As shown in the tables, CO concentrations at affected intersections in 2035 for both the No Project and HST alternatives are expected to be lower than existing conditions in 2009. HST alternatives would have slightly higher CO concentration at intersections than the No Project Alternative in 2035 due to the additional traffic cause by the station or HMF operation. Predicted CO concentrations for all modeled intersections are below NAAQS and CAAQS, therefore, are not expected to cause violations of CO NAAQS during project operation so impacts would be less than significant under CEQA and of negligible intensity under NEPA.

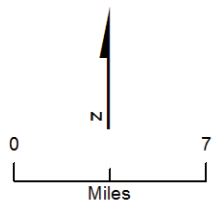
In addition to evaluating the potential CO hot spots associated with changes in traffic near intersections, maximum 1-hour and 8-hour CO concentrations were estimated near HST station parking structures. Figure 3.3-4 shows the approximate locations of the HST station parking structures. To be conservative, for the Merced Station it was assumed that three parking structures, at full capacity (2 structures with 7 levels and 2,850 parking spaces each, and 1 structure with 5 levels and 2,000 parking spaces), would have vehicles departing within the same hour each day. To be conservative, the 8-hour CO impacts were based on this 1-hour scenario. There are two alternatives for the Fresno station. Modeling results for the Fresno Station parking structures were taken from *Fresno to Bakersfield Section Air Quality Technical Report* (Authority and FRA 2012b). Tables 3.3-24 and 3.3-25 summarize the modeled CO concentrations at the Merced and Fresno parking structures, including ambient background, respectively. For this analysis, only vehicles within the parking structures were evaluated as contributing to CO hot spots. Vehicle travel outside the parking structure are evaluated in the CO hot-spot analysis for the intersections, therefore, are not included in the parking structure analysis.

As shown in Tables 3.3-21 through 3.3-25, the intersections and parking structures evaluated would have CO concentrations lower than the NAAQS and the CAAQS. Therefore, the localized CO impacts from the project operation would be less than significant under CEQA and of negligible intensity under NEPA.



Source: Authority and FRA (2012).

MF\_EIS\_AQ\_03 Mar 23, 2012



- UPRR/SR 99 Alternative
- BNSF Alternative
- Hybrid Alternative
- ▭ Potential Heavy Maintenance Facility
- City Limit
- - - County Boundary
- +— Railroad
- Intersection Evaluated in CO Modeling Analysis
- Parking Structure Evaluated in CO Analysis

**Figure 3.3-4**  
 CO Hot-Spot Evaluation Intersections  
 (Project vs. No Project 2035)



**Table 3.3-21**  
Maximum Modeled CO Concentrations at Intersections near the Merced HST Stations and Castle Commerce Center HMF Site<sup>a</sup>

Intersection	Existing Conditions		2035 No Project/No Action		2035 Project Option A (Local Parking Option)		2035 Project Option B (Remote Parking Option)	
	Max 1-Hour CO	Max 8-Hour CO	Max 1-Hour CO	Max 8-Hour CO	Max 1-Hour CO	Max 8-Hour CO	Max 1-Hour CO	Max 8-Hour CO
	Concentration (ppm) <sup>b</sup>	Concentration (ppm) <sup>b</sup>	Concentration (ppm)	Concentration (ppm) <sup>b</sup>	Concentration (ppm)	Concentration (ppm) <sup>b</sup>	Concentration (ppm)	Concentration (ppm) <sup>b</sup>
<b>Merced HST Station Area</b>								
13th St - SR-99 SB Off-Ramp / V St - AM <sup>d</sup>	5.30	3.40	4.20	2.63	4.20	2.63	4.20	2.63
16th St / Martin Luther King Wy - PM	5.20	3.33	4.20	2.63	4.20	2.63	4.20	2.63
Main St / G St - PM <sup>d</sup>	4.10	2.56	3.70	2.28	4.10	2.56	4.10	2.56
<b>Castle Commerce Center HMF Area c</b>								
16th St / M St - PM	5.2	3.33	4.2	2.63	4.3	2.70	4.3	2.70
<b>Ambient Air Quality Standards</b>								
CAAQS	20	9	20	9	20	9	20	9
NAAQS	35	9	35	9	35	9	35	9

<sup>a</sup> Concentrations include a predicted 1-hour background concentration of 3.5 ppm and an 8-hour background concentration of 2.14 ppm, representing the second-highest measured CO concentrations in years 2007-2009.

<sup>b</sup> A persistence factor of 0.7 was used to estimate the 8-hour CO concentrations based on the generalized persistence factor for urban locations in the CO Protocol (Caltrans 1997).

<sup>c</sup> This worst-case intersection associated with the Merced train station was also identified as a worst-case intersection for the Castle Commerce Center HMF. Only the Merced Station contributes to the modeled impacts; therefore additional modeling was not done for the Castle Commerce Center HMF.

**Table 3.3-22**  
 Maximum Modeled CO Concentrations at Intersections near the Fresno HST Station and Herndon Avenue and Shaw Avenue<sup>a</sup>

Intersection	Existing Conditions		2035 No Project/No Action		2035 Project Option	
	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>b</sup>	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>b</sup>	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>b</sup>
<b>Fresno Train Station Area</b>						
Van Ness St/ Inyo St	3.5	2.6	3.3	2.5	3.3	2.5
S St/ Tulare St	3.5	2.6	3.4	2.6	3.4	2.6
Van Ness Ave/ Fresno St	3.7	2.8	3.4	2.6	3.5	2.6
Tulare St / F St (underpass scenario)	3.3	2.5	3.4	2.6	3.4	2.6
Fresno St / F St (underpass scenario)	3.6	2.7	3.4	2.6	3.4	2.6
Fresno St/ F St (overpass scenario)	3.6	2.7	3.4	2.6	3.6	2.7
Stanislaus St/F St (overpass scenario)	3.3	2.5	3.4	2.6	3.4	2.6
<b>Herndon and Shaw Avenue</b>						
Veterans Blvd / Bullard Ave – AM	NA <sup>d</sup>	NA <sup>d</sup>	4.4	2.77	4.6	2.91
Veterans Blvd / Bullard Ave – PM	NA <sup>d</sup>	NA <sup>d</sup>	4.4	2.77	4.6	2.91
Veterans Blvd / Golden State Blvd Connector South – AM	NA <sup>d</sup>	NA <sup>d</sup>	4.4	2.77	4.6	2.91
Veterans Blvd / Golden State Blvd Connector South – PM	NA <sup>d</sup>	NA <sup>d</sup>	4.4	2.77	4.6	2.91

Intersection	Existing Conditions		2035 No Project/No Action		2035 Project Option	
	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>b</sup>	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>b</sup>	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>b</sup>
<b>Ambient Air Quality Standards</b>						
CAAQS	20	9	20	9	20	9
NAAQS	35	9	35	9	35	9

NA = not applicable  
<sup>a</sup> Background CO data taken from Fresno First Street monitoring station were found to be 3.10 ppm for 1-hour CO concentration and 2.34 ppm for 8-hour CO concentration.  
<sup>b</sup> Concentrations include a predicted 1-hour background concentration of 3.5 ppm and an 8-hour background concentration of 2.14 ppm, representing the second-highest measured CO concentrations in years 2007-2009.  
<sup>c</sup> A persistence factor of 0.7 was used to estimate the 8-hour CO concentrations based on the generalized persistence factor for urban locations in the CO Protocol (Caltrans 1997).  
<sup>d</sup> These intersections do not exist in 2009 but were included in the 2035 analysis based on the screening criteria.

**Table 3.3-23**  
Maximum Modeled CO Concentrations at Intersections along SR 99<sup>a</sup> and Roeding Park Area

Intersection	Existing Conditions		2035 No Project/No Action		2035 Project Option		2035 Project Option with Mitigation	
	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>b</sup>	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>b</sup>	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>b</sup>	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>b</sup>
	<b>SR 99</b>							
Clinton Ave / Brawley Ave – PM	4.6	2.91	4.1	2.56	4.2	2.63	4.1	2.56
Clinton Ave / Marks Ave – AM	5.0	3.19	4.2	2.63	4.4	2.77	4.4	2.77
Clinton Ave / Marks Ave – PM	5.7	3.68	4.1	2.56	4.3	2.7	4.3	2.7
Clinton Ave / Weber Ave - AM	5.4	3.47	4.3	2.7	4.4	2.77	4.4	2.77
<b>Roeding Park Area</b>								
W Olive and SR 99 SB - AM	NA <sup>c</sup>	NA <sup>c</sup>	4.7	3.0	4.8	3.1	4.8	3.1
W Olive and SR 99 SB - PM	NA <sup>c</sup>	NA <sup>c</sup>	4.7	3.0	4.7	3.0	4.8	3.1
W Olive and SR 99 NB - PM	NA <sup>c</sup>	NA <sup>c</sup>	4.8	3.1	4.9	3.1	4.9	3.1

Intersection	Existing Conditions		2035 No Project/No Action		2035 Project Option		2035 Project Option with Mitigation	
	Max 1-Hour CO	Max 8-Hour CO	Max 1-Hour CO	Max 8-Hour CO	Max 1-Hour CO	Max 8-Hour CO	Max 1-Hour CO	Max 8-Hour CO
	Concentration (ppm)	Concentration (ppm) <sup>b</sup>	Concentration (ppm)	Concentration (ppm) <sup>b</sup>	Concentration (ppm)	Concentration (ppm) <sup>b</sup>	Concentration (ppm)	Concentration (ppm) <sup>b</sup>
<b>Ambient Air Quality Standards</b>								
CAAQS	20	9	20	9	20	9	20	9
NAAQS	35	9	35	9	35	9	35	9

<sup>a</sup> Concentrations include a predicted 1-hour background concentration of 3.5 ppm and an 8-hour background concentration of 2.14 ppm, representing the second-highest measured CO concentrations in years 2007-2009.

<sup>b</sup> A persistence factor of 0.7 was used to estimate the 8-hour CO concentrations based on the generalized persistence factor for urban locations in the CO Protocol (Caltrans 1997).

<sup>c</sup> These intersections did not exist in 2009 but were included in the 2035 analysis based on the screening criteria.



**Table 3.3-24**  
 Maximum Modeled 2035 CO Concentrations at Merced HST Station Parking Structures

Park-and-Ride Station	1-Hour Concentration (ppm)		8-Hour Concentration (ppm)	
	Maximum Modeled Increase <sup>a</sup>	Total Concentration <sup>b</sup>	Maximum Modeled Increase <sup>c</sup>	Total Concentration <sup>d</sup>
Station Parking Structure A	1.4	4.9	1.0	3.1
Station Parking Structure B	1.4	4.9	1.0	3.1
Station Parking Structure C	0.5	4.0	0.4	2.5
Total Merced Parking Structure CO Concentrations	3.3	6.8	2.4	4.5
CAAQS	N/A	20	N/A	9
NAAQS	N/A	35	N/A	9

N/A = not available  
<sup>a</sup> The total concentrations assume that all three parking structures (A, B, and C) would be operating at maximum capacity.  
<sup>b</sup> 1-hour background CO concentration of 3.50 ppm.  
<sup>c</sup> 8-hour CO concentrations determined by multiplying the 1-hour concentrations by a persistence factor of 0.7.  
<sup>d</sup> 8-hour background CO concentration of 2.14 ppm.

**Table 3.3-25**  
 Maximum Modeled 2035 CO Concentrations at Fresno Station Parking Facilities

Station Option	1-Hour Concentration (ppm)		8-Hour Concentration (ppm)	
	Maximum Modeled Increase	Total Concentration <sup>a,b</sup>	Maximum Modeled Increase	Total Concentration <sup>a,b</sup>
Fresno Station–Mariposa Street Alternative <sup>c</sup>	0.5	3.6	0.35	2.69
Fresno Station–Kern Street Alternative <sup>c</sup>	0.6	3.7	0.42	2.76

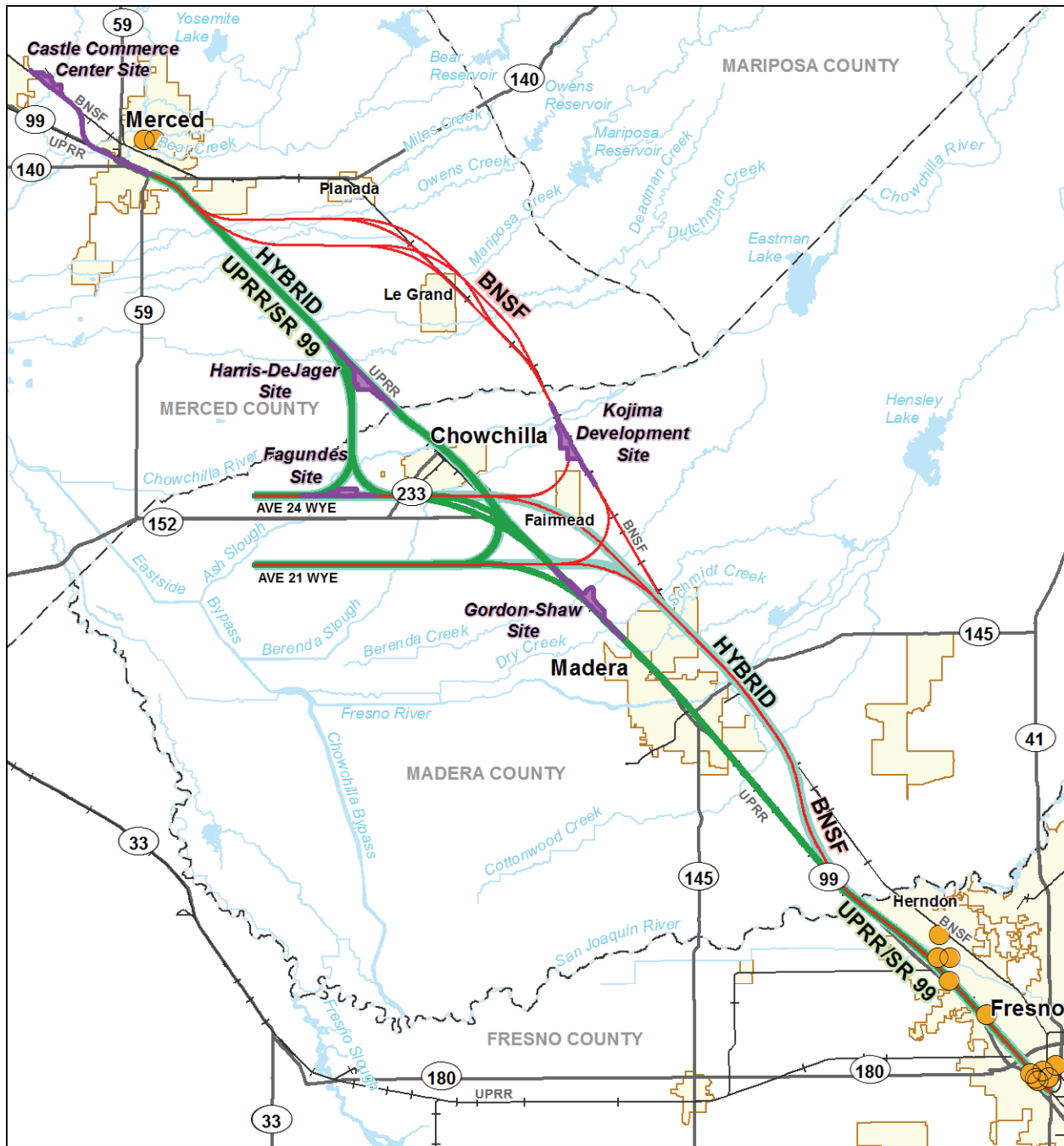
<sup>a</sup> 8-hour CO concentrations at the parking garages were compared to the federal and state 8-hour CO standard of 9 ppm. 1-hour CO concentrations at the parking garages were compared to the federal 1-hour CO standard of 35 ppm and to the state 1-hour CO standard of 20 ppm. There were no exceedances of any standards due to CO concentrations at parking garages.  
<sup>b</sup> 8-hour CO concentrations determined by multiplying the 1-hour concentrations by a persistence factor of 0.7.  
<sup>c</sup> Background CO data taken from Fresno First Street monitoring station for all Fresno station parking structures were found to be 3.10 ppm for 1-hour CO concentration and 2.34 ppm for 8-hour CO concentration.

*Existing Condition Plus Project vs. Existing Condition*

In addition to the analysis for the Project vs. No Project, a comparison between the HST alternatives, not accounting for natural growth and other transportation improvement projects in the region (i.e., existing condition plus project), relative to existing conditions was performed. According to this analysis, the project would not cause violations of CO NAAQS at affected intersections. Details of the CO hot-spot analysis of the HST alternatives compared to existing conditions are included in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

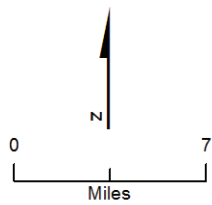
Intersections included in the CO hot-spot modeling were selected based on comparisons of LOS, traffic volumes, and delay time under the existing condition and the existing condition plus project at the intersections. Figure 3.3-5 demonstrates the intersections included in the modeling. Tables 3.3-26 through 3.3-28 summarize the modeled CO concentrations for the selected intersections. The CO hot-spot analysis results presented in the tables include the modeled concentrations plus the background concentrations. The background CO concentrations are from monitored data representing existing conditions (2007 – 2009). Modeling results for intersections near the Fresno Station were taken from *Fresno to Bakersfield Section Air Quality Technical Report* (Authority and FRA 2012b).

As shown in Tables 3.3-26 through 3.3-28, the intersections evaluated would have CO concentrations lower than the NAAQS and the CAAQS for both the existing condition and the existing condition plus project. Therefore, the localized CO emissions from the existing condition plus project would not be expected to cause a violation of the ambient air standards, and the localized impacts at affected intersections would be less than significant under CEQA and of negligible intensity under NEPA. CO impacts at parking structures are assumed to be the same as the Project vs. No Project analysis as shown in Tables 3.3-24 and 3.3-25, because traffic patterns in the parking structure described for the Project vs. No Project analysis are not expected to change in the existing plus project vs. existing condition analysis.



Source: Authority and FRA (2011).

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- UPRR/SR 99 Alternative
- BNSF Alternative
- Hybrid Alternative
- Potential Heavy Maintenance Facility
- City Limit
- - - County Boundary
- +— Railroad
- Intersection Evaluated in CO Modeling Analysis

**Figure 3.3-5**  
 CO Hot-Spot Evaluation Intersections  
 (Existing plus Project vs. Existing  
 Conditions 2009)

**Table 3.3-26**

Maximum Modeled 2009 CO Concentrations at Intersections near the Merced HST Station and Castle Commerce Center HMF Site<sup>a, b</sup>

Intersection	Existing Conditions		Existing Plus Project Option A (Local Parking Option)		Existing Plus Project Option B (Remote Parking Option)	
	Max 1-Hour CO Concentration (ppm) <sup>c</sup>	Max 8-Hour CO Concentration (ppm) <sup>c</sup>	Max 1-Hour CO Concentration (ppm) <sup>c</sup>	Max 8-Hour CO Concentration (ppm) <sup>c</sup>	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>c</sup>
	Olive Ave / R St – PM	5.90	3.82	5.90	3.82	5.90
Olive Ave / M St – PM	5.90	3.82	6.00	3.89	6.00	3.89
<b>Ambient Air Quality Standards</b>						
CAAQS	20	9	20	9	20	9
NAAQS	35	9	35	9	35	9

<sup>a</sup> Concentrations include a predicted 1-hour background concentration of 3.5 ppm and an 8-hour background concentration of 2.14 ppm, representing the second-highest measured CO concentrations in years 2007-2009.

<sup>b</sup> The worst-case intersection associated with the Merced Station was also identified as a worst-case intersection for the Castle Commerce Center HMF. Only the Merced Station contributes to the modeled impacts, so additional modeling was not done for the Castle Commerce Center HMF.

<sup>c</sup> A persistence factor of 0.7 was used to estimate the 8-hour CO concentrations based on the generalized persistence factor for urban locations in the CO Protocol (Caltrans 1997).

**Table 3.3-27**  
Maximum Modeled 2009 CO Concentrations at Intersections near the Fresno HST Station<sup>a</sup> and Herndon Ave and Shaw Ave<sup>b</sup>

Intersection	Existing Conditions		Existing Plus Project Option	
	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>c</sup>	Max 1-Hour CO Concentration (ppm)	Max 8-Hour CO Concentration (ppm) <sup>c</sup>
	<b>Fresno Train Station Area</b>			
Van Ness St/ Inyo St	3.5	2.6	3.5	2.6
S St/ Tulare St	3.5	2.6	3.6	2.7
Van Ness Ave/ Fresno St	3.7	2.8	3.8	2.8
Tulare St / F St (underpass scenario)	3.3	2.5	3.3	2.5
Fresno St / F St (underpass scenario)	3.6	2.7	3.8	2.8
Fresno St/ F St (overpass scenario)	3.6	2.7	3.8	2.8
Stanislaus St/F St (overpass scenario)	3.3	2.5	3.4	2.6
<b>Herndon Ave and Shaw Ave</b>				
Blythe Ave & Shaw Ave -AM	4.5	2.84	4.5	2.84
Brawley Ave & Shaw Ave - PM	6.9	4.52	6.9	4.52
Figarden Dr & Bullard Ave - AM	6	3.89	6.2	4.03
Figarden Dr & Bullard Ave - PM	6.1	3.96	5.9	3.82
<b>Ambient Air Quality Standards</b>				
CAAQS	20	9	20	9
NAAQS	35	9	35	9

<sup>a</sup> Background CO data taken from Fresno First Street monitoring station were found to be 3.10 ppm for 1-hour CO concentration and 2.34 ppm for 8-hour CO concentration.  
<sup>b</sup> Concentrations include a predicted 1-hour background concentration of 3.5 ppm and an 8-hour background concentration of 2.14 ppm, representing the second-highest measured CO concentrations in years 2007-2009.  
<sup>c</sup> A persistence factor of 0.7 was used to estimate the 8-hour CO concentrations based on the generalized persistence factor for urban locations in the CO Protocol (Caltrans 1997).



**Table 3.3-28**  
 Maximum 2009 Modeled CO Concentrations at Intersections along SR 99 <sup>a</sup>

Intersection	Existing Conditions		Existing Plus Project		Existing Plus Mitigated Project	
	Max 1-Hour CO	Max 8-Hour CO	Max 1-Hour CO	Max 8-Hour CO	Max 1-Hour CO	Max 8-Hour CO
	Concentration (ppm)	Concentration (ppm) <sup>b</sup>	Concentration (ppm)	Concentration (ppm) <sup>b</sup>	Concentration (ppm)	Concentration (ppm) <sup>b</sup>
<b>SR 99</b>						
Clinton Ave / Weber Ave - PM	6.3	4.10	6.1	3.96	5.9	3.82
Ashlan & Brawley/SR 99 NB Ramp - PM	6.8	4.45	6.8	4.45	N/A	N/A
<b>Ambient Air Quality Standards</b>						
CAAQS	20	9	20	9	20	9
NAAQS	35	9	35	9	35	9
N/A = not available						
<sup>a</sup> Concentrations include a predicted 1-hour background concentration of 3.5 ppm and an 8-hour background concentration of 2.14 ppm, representing the second-highest measured CO concentrations in years 2007-2009.						
<sup>b</sup> A persistence factor of 0.7 was used to estimate the 8-hour CO concentrations based on the generalized persistence factor for urban locations in the CO Protocol (Caltrans 1997).						

**PM<sub>10</sub>/PM<sub>2.5</sub> Hot-Spot Analysis**

Based on the PM hot-spot analysis performed and as discussed below, the project would provide regional benefits of reducing the regional VMT by approximately 10 to 7% compared to the No Project Alternative and to existing conditions based on the ticket price of 50% to 83% airfare, which would reduce PM<sub>10</sub> and PM<sub>2.5</sub> from regional vehicle travel proportionally. For purposes of identifying and evaluating potential impacts under NEPA and CEQA, a hot-spot analysis was prepared because the area where the project is located is designated nonattainment for PM<sub>2.5</sub> and maintenance for PM<sub>10</sub>, a PM<sub>10</sub> and PM<sub>2.5</sub>. In December 2010, EPA released its *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM<sub>2.5</sub> and PM<sub>10</sub> Nonattainment and Maintenance Areas* (EPA 2010c), which was used for the analysis. Although this analysis is normally associated with the transportation conformity rule, as stated in Section 3.3.2.1, this project is subject to the general conformity and the decision to use this analytical structure notwithstanding, additional analysis or associated activities only required to comply with transportation conformity will be carried out only if discrete project elements become subject to those requirements in the future. In accordance with this guidance, if a project meets one of the following criteria, it is considered a project of air quality concern and a quantitative PM<sub>10</sub>/PM<sub>2.5</sub> analysis is required:

- *New or expanded highway projects that have a significant number of or significant increase in diesel vehicles.* The proposed project is not a new highway project, nor would it expand an existing highway beyond its current capacity. The HST vehicles would be electrically powered. While it would affect traffic conditions on roadways near the stations, it should not measurably affect truck volumes on the affected roadways. Most vehicle trips entering and leaving the stations would be passenger vehicles, which are typically not diesel-powered. Truck trips would be minimal and changes in diesel emissions would be negligible. Furthermore, the HST Project would improve the regional traffic

conditions by reducing traffic congestion, increasing vehicle speeds, and reducing regional VMT within the project vicinity.

- Projects affecting intersections that are at LOS D, E, or F with a significant number of diesel vehicles or those that will degrade to LOS D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project. Generally, the HST Project would not change the existing traffic mix at signalized intersections. Although the maintenance facilities would use diesel vehicles, no signalized intersections were identified with LOS D, E, or F for these locations (Authority and FRA 2011b). In some cases, the LOS of intersections near the HST stations would change from LOS E under the No Project Alternative to LOS F under the HST alternatives. However, the traffic volume increases at the affected intersections would be primarily passenger cars and transit buses used for transporting people to or from the stations. Passenger cars would be gasoline powered. By 2016, transit buses in Fresno would be natural gas fueled (Shenson 2010). Buses in Merced would include a combination of natural-gas-fueled buses and diesel buses equipped with advanced control technologies (Ghearing 2010). Therefore, the HST alternatives would not measurably increase the number of diesel vehicles at affected intersections.
- New or expanded bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location. Although the proposed project would include passenger rail terminals, there would not be a significant number of diesel vehicles congregating at a single location. The HST vehicles would be electrically powered; most vehicle trips entering and leaving the station would be passenger vehicles, which are not typically diesel-powered; the transit buses used at the stations would be mostly natural gas fueled—with approximately 30 trips per day, including 4 trips during each AM or PM peak hour. The maintenance facilities may have diesel vehicles such as in-yard diesel locomotives to pull in or pull out the EMUs. However, the number of diesel locomotives and other diesel vehicles used at the maintenance facilities would be limited.
- Projects in, or affecting, locations, areas, or categories of sites that are identified in the PM<sub>2.5</sub>- or PM<sub>10</sub>-applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation. The areas where the HST stations and maintenance facilities are located are not identified as sites of violation or possible violation in EPA-approved 2003 SIP, EPA-approved PM<sub>10</sub> Maintenance Plan, or the adopted 2008 PM<sub>2.5</sub> Plan for San Joaquin Valley (SJVAPCD 2008; SJVAPCD 2007b).

For the reasons above, the proposed HST Project was determined not to be a project of air quality concern, as defined by 40 CFR 93.123(b)(1) and would not likely cause violations of PM<sub>10</sub>/PM<sub>2.5</sub> NAAQS during its operation.

Therefore, quantitative PM<sub>2.5</sub> and PM<sub>10</sub> hot-spot evaluations are not required. CAA 40 CFR Part 93.116 requirements are, therefore, met without a quantitative hot-spot analysis. The HST Project is unlikely to cause any localized adverse impact on air quality for PM<sub>10</sub>/PM<sub>2.5</sub> standards. The PM<sub>10</sub> hot-spot impact on air quality has negligible intensity (NEPA) and less than significant (CEQA).

### Localized Analysis of HMF Impacts

Because the exact location of the HMF has not been selected and the design has not been finalized, a detailed modeling analysis was conducted for a prototypical facility using a conceptual design and anticipated HMF activities. Details of the HMF operational impact analysis is presented in the *Merced to Fresno Section Air Quality Technical Report* (Authority and FRA 2012a).

Refined air quality and health risk assessments will be conducted once the options for the HMF facility have been narrowed as part of a future EIR/EIS. While this EIR/EIS contains a thorough analysis of the potential impacts of the alternative HMF sites in the project area, no HMF site selection will be made at this time.

**Modeling Results:** In general, emissions of criteria pollutants from HMF operations would not cause exceedances of NO<sub>2</sub> NAAQS, CAAQS, or federal and state health guidelines at the facility boundary of the



HMF.  $PM_{10}$  and  $PM_{2.5}$  concentration increase due to the HMF operation would be minimal. However ambient values currently monitored at the Merced, Madera, Drummond, and Fresno monitoring stations exceed the  $PM_{2.5}$  and  $PM_{10}$  NAAQS and CAAQS; therefore,  $PM_{10}$  or  $PM_{2.5}$  may continue to exceed these standards at the facility boundary where the worst-case ground-level concentration of pollutants from HMF would occur. CO analysis for the worst-case intersections near the HMF facility demonstrates that no CO NAAQS or CAAQS violations are expected from nearby traffic volume increases.

Health risk analysis indicated that the receptors located within 1,300 feet of the HMF facility may be exposed to cancer risks greater than 10 in a million. Cancer risks at a distance more than 1,300 feet from the facility are estimated to be below 10 in a million. The worst-case acute and chronic hazard indexes are both estimated to be less than 1 at any locations outside the HMF boundary.

### *Conclusions*

**NEPA:** Only one HMF site will be selected for implementation, and such selection will be made as part of a future EIR/EIS. Based on the prototypical HMF analysis,  $PM_{10}$  and  $PM_{2.5}$  emissions from HMF and the subsequent ground-level concentration increases are minimal. However, to be conservative, it was assumed that all of the HMF sites would have potential impacts of substantial intensity for  $PM_{2.5}$  under NEPA because the HMF would be in an area with  $PM_{2.5}$  concentrations that already exceed the  $PM_{2.5}$  NAAQS. All of the HMF sites would have impacts of substantial intensity for  $PM_{10}$  and  $NO_x$  under NEPA because the HMF emissions would not cause exceedances to the  $PM_{10}$  or  $NO_2$  NAAQS.

Among the five HMF sites, the Castle Commerce Center, Gordon-Shaw, and Kojima Development sites may have sensitive receptors located in areas where the cancer risk exceeds 10 in a million; therefore, operation of HMF at these three sites can potentially cause impacts of moderate intensity under NEPA.

Harris-DeJager and Fagundes HMF sites do not have sensitive receptors located in areas with cancer risks over 10 in a million; therefore, the intensity of health impacts from TACs are expected to be negligible under NEPA for Harris-DeJager and Fagundes HMF sites.

**CEQA:** To be conservative, it was assumed that all of the HMF sites would have potentially significant impacts for  $PM_{10}$  and  $PM_{2.5}$  under CEQA because the HMF is in an area where  $PM_{10}$  and  $PM_{2.5}$  concentrations currently exceed CAAQS. All of the HMF sites would have less-than-significant impacts for  $NO_2$  under CEQA because the HMF would not cause an exceedance of the  $NO_2$  CAAQS.

Health impacts from TACs are expected to be less than significant under CEQA for the Harris-DeJager and Fagundes sites, because no sensitive receptors near these two site would be exposed to cancer risks over 10 in a million or noncancer hazard indexes over 1.0 (SJVAPCD CEQA thresholds). Due to the closer distance between the sensitive receptors and the HMF at the Castle Commerce Center, Gordon-Shaw, and Kojima Development HMF sites, HMF operation at these three sites may have the potential to expose sensitive receptors to higher concentrations of TACs from both stationary sources and mobile sources compared to the other two HMF sites and this may result in higher health risks, especially cancer risks, which exceed CEQA health thresholds. Therefore, Castle Commerce Center, Gordon-Shaw, and Kojima Development HMF sites operation could potentially cause significant health impacts under CEQA.

The health risk analysis is conservative because all stationary sources at the HMF site would be required to go through the SJVAPCD permitting process to ensure that the risk due to project operation is below the SJVAPCD health risk significance thresholds.

### **Odors**

#### *General Operations*

No potentially odorous emissions would be associated with the train operation because the high-speed trains would be powered using electricity from the regional power grid. However, there would be some "area source" emissions associated with station operation such as natural gas combustion for space and water heating, landscaping equipment emissions, and minor solvent and paint use. The solvent and paint use might be potential odorous sources to sensitive receptors in areas where the stations are located.

Nearby sensitive land uses would be exposed daily to potential odors when the stations are operational. The sensitive receptors would be exposed to some odors, but the exposure to odors is not as severe as it would be from other industrial activities that take place near stations under the No Project Alternative. Because the project would not likely create objectionable odors, there would be no impact under NEPA and a less-than-significant impact under CEQA.

#### *HMF Operations*

HMF operations would be a source of potentially odorous emissions from paints, solvents, and a small wastewater treatment plant. Except for the Castle Commerce Center HMF site, the four HMF sites are far from urbanized areas with residential and business land uses and are not expected to cause odor nuisance to the nearby public.

In addition, the HMF would be permitted through the SJVAPCD, with controls on operations generating odorous emissions to meet the public nuisance requirements. There would be operating conditions and controls on the potential sources of odors such as the spray booth and the wastewater treatment plant at the HMF. Therefore, the associated odor impacts from the HMFs would be of negligible intensity under NEPA and less than significant under CEQA.

#### **Compliance with Air Quality Plans**

During operation, the project would reduce the amount of vehicle miles traveled in the region, which would reduce regional O<sub>3</sub> precursor pollutant emissions. The project would also decrease emissions from other modes of travel (buses, diesel trains, and airplanes). This would be consistent with the SJVAB 8-hour Ozone Air Quality Plan (2007), the 2004 Extreme Ozone 1-hour Plan<sup>8</sup>, the 2007 PM<sub>10</sub> Maintenance Plan, the 2008 PM<sub>2.5</sub> Plan and the RTPs for Merced, Madera, and Fresno counties. Therefore, operation of the project would not conflict with or obstruct implementation of applicable air quality plans.

### **3.3.7 Compliance with Conformity Rules**

Projects requiring approval of funding from federal agencies that are in areas designated as nonattainment or maintenance for the NAAQS are subject to EPA's Conformity Rule. The two types of federal conformity are general conformity, which applies to the HST Project due to FRA funding, and transportation conformity, which does not apply at this time, but could apply to future actions related to the project's minor expansions or realignments of local roadways. Draft Conformity Determination for the Merced to Fresno Section is included as Appendix 3.3-B.

#### **General Conformity**

To determine whether projects are subject to the GC determination requirements, EPA has established GC applicability threshold values (in tons per calendar year) for each of the criteria pollutants for each type of designated nonattainment and maintenance area. If the annual emissions generated by construction or operation of a project (on an area-wide basis) are less than these threshold values, the impacts of the project are not considered to be significant and no additional analyses are required. If the emissions are greater than these values, compliance with the GC Rule must be demonstrated.

The applicable project area is in an area designated as extreme nonattainment for the 8-hour O<sub>3</sub> standard, nonattainment for PM<sub>2.5</sub>, and maintenance for PM<sub>10</sub> and CO. The GC threshold values for this area, according to 40 CFR Part 93, are 10 tons per year for VOC, 10 tons per year for NO<sub>x</sub>, and 100 tons per year for SO<sub>2</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, and CO.

Because the regional emissions for the applicable pollutants are lower under the operational phase of the HST alternatives than for the No Project Alternative, only emissions generated during the construction phase need to be compared to these threshold values to determine whether the GC Rule is applicable.

<sup>8</sup> The 1-hour ozone standard was revoked by the EPA effective June 15, 2005, for areas including the SJVAB. However, the EPA still approved the 2004 Extreme Ozone Plan for 1-hour ozone on March 8, 2010 (SJVAPCD 2010b).



As shown in Tables 3.3-7 through 3.3-9, construction-phase emissions in SJVAB are greater than the GC threshold(s) for:

- VOC for the years 2014, 2015, and 2019 for all alternatives.
- NO<sub>x</sub> for the years 2013-2020 for all alternatives.

As such, the project must demonstrate compliance with the GC Rule before construction begins. Compliance with the GC Rule can be demonstrated in one or more of the following ways:

- By offsetting the project's construction-phase emissions for pollutant emissions that exceed the annual GC thresholds. For example, if the VOC threshold will be exceeded in 2015, the project would offset those emissions in that year.
- By showing that the construction-phase emissions are included in the area's emission budget for the SIP.
- By demonstrating that the state agrees to include the emission increases in the SIP without exceeding emission budgets.

Compliance with the GC Rule for the Preferred Alternative is required prior to the construction of the HST Project, but may be completed concurrent with EIS/EIR certification, and would be demonstrated through one or more of the methods listed above. Demonstration of compliance with the GC Rule will not change the results of the analysis described in this section.

Construction-phase emissions associated with material-hauling outside the SJVAB are greater than the applicability threshold(s) for: NO<sub>x</sub> in the South Coast Air Basin for certain hauling scenarios.

### ***Transportation Conformity***

Transportation conformity is an analytical process required for all federally funded highway and transit transportation projects but does not apply to this project. Under the 1990 CAA Amendments, the U.S. Department of Transportation cannot fund, authorize, or approve federal highway and transit actions that are not first found to conform to the SIP for achieving the goals of the CAA requirements. Transportation conformity with the CAA takes place at both the regional level and the project level.

As discussed in previous sections, the Merced to Fresno Section of the HST Project is not subject to the transportation conformity rule. However if the project requires future actions that meet the definition of a project element subject to transportation conformity, additional determinations and associated analysis will be completed as may be required.

### **3.3.8 Project Design Features**

The Authority and FRA have considered avoidance and minimization measures consistent with the 2005 Statewide Program EIR/EIS commitments. During project design and construction, the Authority and FRA would implement measures to reduce impacts on air quality. These measures are considered to be part of the project and are summarized below:

- Trucks will be covered to reduce significant fugitive dust emissions while hauling soil and other similar material.
- All trucks and equipment will be washed before exiting the construction site.
- Exposed surfaces and unpaved roads will be watered three times daily.
- Vehicle travel speed on unpaved roads will be reduced to 15 miles per hour.
- Any dust-generating activities will be suspended when wind speed exceeds 25 mph.



- All disturbed areas, including storage piles, that are not being actively used for construction purposes will be effectively stabilized for dust emissions using water or a chemical stabilizer/suppressant, or covered with a tarp or other suitable cover or vegetative ground cover.
- All onsite unpaved roads and offsite unpaved access roads will be effectively stabilized for dust emissions using water or a chemical stabilizer/suppressant.
- All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities will be effectively controlled for fugitive dust emissions by an application of water or by presoaking. With the demolition of buildings up to six stories in height, all exterior surfaces of the buildings will be wetted during demolition.
- All materials transported offsite will be covered or effectively wetted to limit visible dust emissions, and at least 6 inches of freeboard space from the top of the container will be maintained.
- All operations will limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.
- Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, piles will be effectively stabilized for fugitive dust emissions using sufficient water or a chemical stabilizer/suppressant.
- Within urban areas, trackout will be immediately removed when it extends 50 or more feet from the site and at the end of each workday.
- Any site with 150 or more vehicle trips per day will prevent carryout and trackout.
- Use of low-VOC paint that contains less than 10% of VOC contents. (VOC, 10%). A Super-compliant or Clean Air paint that has a lower a VOC content than those required by South Coast AQMD Rule 1113, will also be used when available

### 3.3.9 Mitigation Measures

Operation of the HST Project would, in general, improve air quality because of the reduction in regional emissions. Construction of the project, however, would temporarily increase regional emissions and possibly cause or exacerbate an exceedance of an air quality standard. As such, mitigation measures designed to minimize potential air quality impacts focused on the construction phase of the project. These mitigation measures, which would go beyond the control measures listed in Section 3.3.8, Project Design Feature, include measures identified in the 2005 Statewide Program EIR/EIS and controls required by the SJVAPCD rules. The mitigation measures would be the same regardless of whether the project is compared to the existing conditions as baseline or no project as baseline. Temporary, short-term, emission increases associated with construction activities could be reduced with mitigation strategies and design practices. None of these mitigation measures will result in adverse secondary effects.

The FRA and Authority will take the following approach to mitigating the project's construction regional emissions impacts for NO<sub>x</sub> and VOCs: First, FRA and the Authority will require the construction contractor to comply with AQ-MM#1 and AQ-MM#2. These measures essentially require the contractor to use the cleanest/newest construction and truck hauling fleet mix that is reasonably available, and to document efforts to locate and secure such equipment. The availability of a clean fleet equipment, however, was not assumed to be available in the emissions reported for the project in this EIR/EIS, given availability uncertainty. Accordingly, AQ-MM#1 and AQ-MM#2 if successful will reduce project emissions. Second, AQ-MM#4 would be used to ensure emissions—either amounts those reported in this EIR/EIS or a lesser amount if AQ-MM#1 and AQ-MM#2 are successful—are fully mitigated to less than significant levels. In other words, the project will attempt to reduce emissions directly onsite first (AQ-MM#1 and AQ-MM#2) before using emissions offsets (AQ-MM#4).

**AQ-MM#1: Reduce Criteria Exhaust Emissions from Construction Equipment.** This mitigation measure will apply to heavy-duty construction equipment used during the construction phase. All off-road construction diesel equipment will use the cleanest reasonably available equipment (including newer equipment and/or tailpipe retrofits), but in no case less clean than the average fleet mix, as set forth in CARB's Non-Road 2007 database. The contractor will document efforts it undertook to locate newer equipment (such as, in order of priority, Tier 4, Tier 3 or Tier 2 equipment) and/or tailpipe retrofit equivalents. The contractor shall provide documentation of such efforts, including correspondence with at least two construction equipment rental companies. A copy of each unit's certified tier specification and any required CARB or SJVAPCD operating permit will be made available at the time of mobilization of each piece of equipment. The contractor shall keep a written record (supported by equipment hours meters where available) of equipment usage during project construction for each piece of equipment.

**AQ-MM#2: Reduce Criteria Exhaust Emissions from On-Road Construction Vehicles.** This mitigation measure applies to on-road trucks used to haul construction materials, including fill, ballast, rail ties, and steel. Material hauling trucks will consist of an average fleet mix of equipment model year 2010 or newer, to the extent reasonably practicable. The contractor shall provide documentation of efforts to secure such fleet mix. The contractor shall keep a written record of equipment usage during project construction for each piece of equipment.

**AQ-MM#3: Reduce the Potential Impact of Concrete Batch Plants.** Concrete batch plants will be sited at least 1,000 feet from sensitive receptors, including daycare centers, hospitals, senior care facilities, residences, parks, and other areas where people may congregate.

Construction-phase emissions were estimated with these three mitigation measures and the result is that the mitigated emissions for NO<sub>x</sub> and VOCs for certain construction years would still be greater than the GC significant impact thresholds. As such, construction phase emissions would be offset as follows:

**AQ-MM#4: Offset Project Construction Emissions through an SJVAPCD VERA.** The Authority and SJVAPCD will enter into a contractual agreement to mitigate the project's emissions by providing funds for the district's Emission Reduction Incentive Program<sup>9</sup>(SJVAPCD, 2011) to fund grants for projects that achieve emission reductions, thus offsetting project-related impacts on air quality. The project will commit to reduce construction emissions for NO<sub>x</sub> and VOC through the VERA program.

**AQ-MM#5: Purchase Offsets and Offsite Emission Mitigation for Emissions Associated with Hauling Ballast Material in Certain Air Districts.** This mitigation measure will apply to scenarios where the ballast material is hauled from quarries located outside the SJVAB. NO<sub>x</sub> offsets will be purchased from the South Coast AQMD. In the Bay Area AQMD, any emissions above the district's significance threshold will be mitigated through an offsite emission mitigation program to achieve emission reduction due to material hauling in Bay Area AQMD. Potential offsite mitigation programs include the Bay Area AQMD's Carl Moyer Memorial Air Quality Standards Attainment Program (CMP) or other air district emission reduction incentive programs.

The following operational phase measures would be implemented to reduce emissions and/or impacts from HMF operations:

**AQ-MM#6: Reduce the Potential Impact of Toxics.** The following mitigation measures will be applied to HMF operations for all site options to the extent practicable:

- Use of electric or hybrid trucks to serve the facility.
- Use of electric or Clean Switcher Locomotive to minimize the emissions from HMF operation.
- Adjustment of the facility operation and orientation to move emission activities to areas where impacts on the surrounding sensitive areas are lessened, thus reducing localized impacts on surrounding sensitive receptors.

<sup>9</sup> See [www.valleyair.org/Grant\\_Programs/GrantPrograms.htm](http://www.valleyair.org/Grant_Programs/GrantPrograms.htm)



- A minimum buffer distance of 1,300 feet from sensitive receptors for diesel vehicles, limitations on idling of diesel vehicles at the facility, or preparation of a detailed health risk assessment that shows cancer risk to be less than 10 in a million when the site design is refined.

**AQ-MM#7: Reduce the Potential Impact of Stationary Sources.** This mitigation measure will apply to criteria pollutant sources at the HMF sites. Large stationary equipment (combustion equipment, paint booths, wastewater treatment, etc.) will be operated with best industry practices, or alternative equipment will be used, to the extent practical, to reduce emissions of criteria pollutants.

### 3.3.9.1 CEQA and NEPA Level of Impact After Mitigation/Impacts Summary

#### **Construction Period**

**NEPA Impacts:** VOC and NO<sub>x</sub> emissions would exceed GC applicability thresholds for most of the construction phase with or without onsite mitigation (such as AQ-MM #1), and CO, PM<sub>10</sub> and PM<sub>2.5</sub>, and SO<sub>2</sub> emissions would be below the GC thresholds for all construction years. As such, with implementation of AQ-MM#4, which will offset construction phase VOC and NO<sub>x</sub> emissions through the VERA program, the project would have impacts of negligible intensity for all pollutants.

Material hauling outside the SJVAB would have impacts of substantial intensity in the South Coast Air Basin. Mitigation measures AQ-MM#5 would be implemented to reduce NO<sub>x</sub> impacts in these air basins to negligible intensity under NEPA. Other pollutants in these air basins would have impacts of negligible intensity. Material hauling in other air basins for all pollutants would have an air quality impact of negligible intensity under NEPA.

**CEQA Impacts:** Emissions would exceed the SJVAPCD CEQA significance thresholds for VOC and NO<sub>x</sub> for most of the construction phase. Therefore, the project may violate an air quality standard and/or contribute substantially to an existing or projected air quality violation for VOC and NO<sub>x</sub>, and, as such, has the potential to result in a significant impact under CEQA. However, this impact would only last through the HST construction period, these emissions would be offset through the VERA program (AQ-MM #4), and the project would result in emission reduction of VOC, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> throughout the project lifetime once operation starts. After mitigation, these impacts would be less than significant.

There is no SO<sub>2</sub> or CO threshold from SJVAPCD CEQA guidance. However, SO<sub>2</sub> impacts would be expected to be less than significant due to the ultra-low sulfur content of diesel fuel. Impacts on climate change would be less than significant. A CO hot spot is expected to occur during project construction. CO impacts are expected to be less than significant.

Material hauling in SCAQMD and BAAQMD would have significant impacts for NO<sub>x</sub>. Mitigation measure AQ-MM#5 would be implemented to reduce NO<sub>x</sub> emissions in these regions (as described in Section 3.3.9, Mitigation Measures). The CEQA impacts after reducing on-road truck exhaust, purchasing NO<sub>x</sub> offset, and implementing offsite mitigation programs would make the material hauling emissions less than significant.

#### **Project/Operational Phase**

At the regional level, the HST alternatives would result in a net benefit on regional air quality because the HST Project would result in lower MSATs, GHG, VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions than the No Project Alternative. Although PM<sub>10</sub> would have a slight increase compared to existing conditions, the amount would be below the SJVAPCD CEQA threshold. Therefore, the project would not have significant regional impacts under CEQA or impacts with substantial intensity under NEPA. Mitigation is not required for regional emissions from HST operation.

Sensitive receptors located near the Castle Commerce Center, Gordon-Shaw, and Kojima Development HMF sites may have the potential to be exposed to significant toxic emissions and cancer risks. The adverse localized health impact would be reduced to less than significant under CEQA and of negligible intensity under NEPA by implementing AQ-MM#6 and AQ-MM#7.

The localized impacts resulting from changes in traffic patterns would be of negligible intensity, as demonstrated by the results of the CO and PM hot-spot analyses. Localized PM<sub>10</sub> and PM<sub>2.5</sub> emissions from the HMF would be reduced by implementation of mitigation measures. Due to the current exceedances of PM<sub>2.5</sub> to the CAAQS and NAAQS, and exceedances of PM<sub>10</sub> to CAAQS, the PM<sub>10</sub> and PM<sub>2.5</sub> from the HMF would remain significant under CEQA. PM<sub>10</sub> impacts from the HMF would remain at substantial intensity under NEPA. CO impacts would remain insignificant under CEQA and of negligible intensity under NEPA.

### 3.3.10 NEPA Impacts Summary

#### 3.3.10.1 Construction Period Impacts

The No Project Alternative would perpetuate existing dependency on automotive and air travel. The land use patterns of low density would continue to result in increases in pollution emissions under the No Project Alternative. However, SJVAPCD plans to bring the San Joaquin Valley into compliance with NAAQS and CAAQS, which would reduce emissions overall.

Effects due to project construction emissions of VOCs and NO<sub>x</sub> are of substantial intensity because the emissions would exceed GC applicability thresholds in the SJVAB, in which the entire Merced to Fresno Section is located. Mitigation measures, including emission offsets through a VERA to reduce local emissions during the construction period, will be implemented for construction emissions of VOC and NO<sub>x</sub>. The impacts from construction emissions would only last through the HST construction period, and the project would result in emission reduction of VOC, CO, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> throughout the project lifetime once operation starts. Construction air quality impacts will be mitigated to negligible intensity under NEPA. PM<sub>10</sub>, PM<sub>2.5</sub>, and SO<sub>2</sub> impacts would not exceed thresholds and therefore these pollutant impacts would be of negligible intensity.

For material hauling of ballast outside the SJVAB, the emissions through various air basins would be less than the GC thresholds for all pollutants except NO<sub>x</sub>. Material hauling outside the SJVAB would have NO<sub>x</sub> impacts in substantial intensity in the South Coast Air Basin for certain hauling scenarios. Other pollutants in SCAB and all pollutants in other air basins would have air quality impacts with negligible intensity under NEPA.

#### 3.3.10.2 Project/Operational-Phase Impacts

The statewide and regional impact on air quality from operation of the HST would be beneficial. The HST alternatives would result in a net benefit to air quality because the HST Project would result in lower MSATs, GHG, VOC, NO<sub>x</sub>, SO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions than the No Project Alternative. Localized impacts resulting from changes in traffic patterns would be of negligible intensity as demonstrated by the CO and PM hot-spot analyses.

As a result of HMF operations near urbanized areas, impacts on sensitive receptors near the Castle Commerce Center, Gordon-Shaw, and Kojima Development HMF sites from localized increases in TAC emissions at and near the facility have the potential to be of substantial intensity. However, implementing the mitigation measures would reduce potential adverse localized health impact to negligible intensity.

Localized PM<sub>10</sub> and PM<sub>2.5</sub> emissions from the HMF would be reduced by implementation of mitigation measures. Due to the current exceedances of PM<sub>2.5</sub> to NAAQS, the PM<sub>2.5</sub> emissions from the HMF would remain substantial under NEPA.

### 3.3.11 CEQA Significance Conclusions

Table 3.3-29 presents the level of significance for the CEQA criteria thresholds prior to mitigation and after implementation of mitigation measures for the HST alternatives.

**Table 3.3-29**  
 Summary of Significant Air Quality and Global Climate Change Impacts and Mitigation Measures

Impact	Level of Significance before Mitigation	Mitigation Measure	Level of Significance after Mitigation
<b>Construction Period Impacts</b>			
Regional Impacts <b>AQ#1:</b> Construction of the HST alternatives would exceed the CEQA emissions thresholds for VOC and NO <sub>x</sub> . Therefore, it could potentially cause violations of NO <sub>2</sub> and O <sub>3</sub> air quality standards or contribute substantially to NO <sub>2</sub> and O <sub>3</sub> existing or projected air quality violations.	Significant for VOC and NO <sub>x</sub>	<b>AQ-MM#1:</b> Reduce Criteria Exhaust Emissions from Construction Equipment; <b>AQ-MM#2:</b> Reduce Criteria Exhaust Emissions from On-Road Construction Equipment; <b>AQ-MM#3:</b> Reduce the Potential Impact of Concrete Batch Plants; <b>AQ-MM#4:</b> Offset Emissions Through the VERA Program.	Less than significant
Regional Impacts <b>AQ#2:</b> Material hauling outside the SJVAB would exceed CEQA emission thresholds for NO <sub>x</sub> in the BAAQMD, and the SCAQMD for certain hauling scenarios. Therefore, it could potentially cause violations of NO <sub>2</sub> and O <sub>3</sub> air quality standards or contribute substantially to NO <sub>2</sub> and O <sub>3</sub> existing or projected air quality violations in those air districts.	Significant for NO <sub>x</sub> in the Bay Area AQMD, and the South Coast AQMD	<b>AQ-MM#2:</b> Reduce Criteria Exhaust Emissions from On-Road Construction Equipment <b>AQ-MM#5:</b> Purchase offsets for emissions associated with hauling ballast material in BAAQMD and SCAQMD.	Less than significant
Compliance with Air Quality Plans <b>AQ#3:</b> Construction of the HST alternatives would exceed the CEQA emissions thresholds for VOC and NO <sub>x</sub> . Therefore, it would conflict with the 1-hour Ozone Attainment Plan and the 8-hour Ozone Attainment Plan.	Significant for O <sub>3</sub> precursors (VOC and NO <sub>x</sub> )	<b>AQ-MM#1:</b> Reduce Criteria Exhaust Emissions from Construction Equipment; <b>AQ-MM#2:</b> Reduce Criteria Exhaust Emissions from On-Road Construction Equipment; <b>AQ-MM#4:</b> Offset Emissions Through the VERA Program.	Less than significant
Localized Impacts <b>AQ# 4:</b> Construction of the alignment may expose sensitive receptors to temporary substantial pollutant concentrations from concrete batch plants.	Significant	<b>AQ-MM#3:</b> Reduce the Potential Impact of Concrete Batch Plants.	Less than significant

Impact	Level of Significance before Mitigation	Mitigation Measure	Level of Significance after Mitigation
<b>Project Impacts</b>			
Localized Impacts Local Impacts: Localized Hot-Spot Analysis of HMF <b>AQ#5:</b> Operation of the HMF (Castle Commerce Center, Gordon-Shaw, and Kojima Development HMF sites) may expose sensitive receptors to substantial TAC pollutant concentrations. Significant for TAC.	Significant	<b>AQ-MM#6:</b> Reduce the Potential Impact of Air Toxics; <b>AQ-MM#7:</b> Reduce the Potential Impact of Stationary Sources.	Less than significant
Localized Impacts Local Impacts: Localized Hot-Spot Analysis of HMF <b>AQ#6:</b> Operation of the HMF may cause the total PM <sub>10</sub> and PM <sub>2.5</sub> ambient concentrations to exceed CAAQS due to the existing exceedances in the area. Significant for PM <sub>10</sub> and PM <sub>2.5</sub> .	Significant	<b>AQ-MM#7:</b> Reduce the Potential Impact of Stationary Sources.	Significant

