

9.2 Notice of Preparation and Comment Letters





NOTICE OF PREPARATION

Date: September 20, 2019

To: Reviewing Agencies, Organizations, and Interested Parties

Lead Agency: City of San Bernardino

Comment Period: September 23 – October 22, 2019

BNSF ONO LEAD TRACK EXTENSION PROJECT

The purpose of this Notice of Preparation (NOP) is to notify reviewing agencies, including Responsible and Trustee Agencies (Agencies), that the City of San Bernardino (City), as the Lead Agency, will be preparing an Environmental Impact Report (EIR) for the proposed BNSF Ono Lead Track Extension Project (Project). The City is requesting comments and guidance on the EIR scope and content from Responsible and Trustee Agencies, interested public agencies, organizations, and the public (State of California Environmental Quality Act [CEQA] Guidelines § 15082).

Project Overview: The BNSF Ono Lead Track Extension Project proposes to install a fourth lead track extending the existing BNSF San Bernardino Intermodal Facility (SBD Intermodal) A Yard ("A Yard") lead track to two existing Ono Storage Sidings. The Project would involve construction of a fourth lead track within/along approximately 4.3 miles of existing BNSF corridor generally from the BNSF overpass at State Street/University Parkway on the north to the existing SBD Intermodal A Yard at West 5th Street on the south. The proposed changes would improve the A Yard's ability to assemble and hold outbound trains, as well as move around railroad cars without obstructing mainline movements.

The Project does not propose to increase rail line operations; instead it would improve the A Yard's operational efficiency by reducing train congestion along the existing lead tracks and reducing train idling, as they wait to enter and exit the A Yard. The proposed fourth lead track extension would close the existing gap between the two existing Ono Storage Sidings creating a continuous lead track, improving the flow of trains in and out of the A Yard.

The Project proposes stormwater drainage/water quality, circulation/roadway, signal, and utility improvements/modifications that are ancillary and related to the lead track extension. Partial and full property acquisitions would be required outside of the BNSF corridor to accommodate the proposed ancillary improvements. The Project also proposes to request that the City right-of-way (ROW) within the BNSF corridor between the SBD Intermodal A Yard and milepost (MP) 80.8 be vacated and conveyed to the track owner. Project construction is proposed to occur in one phase and is anticipated to begin in 2020 and be completed in 2023. The EIR will assess the Project's potential environmental effects.



Project Location: The Project site, which is comprised of two dis-contiguous segments (i.e., northern and southern), is in southwest County of San Bernardino (County). The southern track segment comprises most of the Project area and is in the northwest portion of the City of San Bernardino. The northern track segment, which is separated by approximately 1.2 linear miles from the southern track segment, is in Muscoy, an unincorporated San Bernardino County community.

The Project area extends approximately 4.3 linear miles along the BNSF corridor adjacent to/west of Interstate 215 (I-215). The Project area's northern terminus is at the BNSF overpass at State Street/University Parkway and its southern terminus is at West 5th Street, just north of the A Yard. Within those limits, the proposed northern and southern segments are as follows:

- Northern Track Segment: approximately 0.3 linear miles, MP 76.5 to MP 76.8,
- Southern Track Segment: approximately 2.8 linear miles, MP 78.0 to MP 80.8, and
- Gap Between Northern and Southern Track Segments: approximately 1.2 linear miles, MP 76.8 to MP 78.0, where no improvements are proposed.

The Project description, location, and potential environmental effects are further discussed in **Attachment A: Summary Project Description**.

Government Code § 65962 Lists: The Project site is not on a site that is included on a list of hazardous materials sites.

Responsible and Trustee Agencies: The City requests your agency's views on the scope and content of environmental issues relevant to your agency's statutory responsibilities concerning the proposed Project, in a manner consistent with State CEQA Guidelines § 15082(b). It is the City's objective for your agency to use the Final EIR when considering any permits that your agency must issue, or other Project approvals.

All parties that have submitted their names and mailing addresses will be notified as part of the Project's CEQA review process. If you wish to be placed on the mailing list, have questions, or need additional information, please contact the lead agency contact noted below (Lead Agency Contact). A copy of this NOP is also available at the following locations:

- City of San Bernardino Planning Department, 201 North E. Street, 3rd Floor, San Bernardino, CA 92401,
- City of San Bernardino Website:
 - http://sbcity.org/cityhall/community_development/planning/environmental_documents.asp, and
- Paul Villasenor Branch Library (a City of San Bernardino public library), 525 North Mt. Vernon Avenue, San Bernardino, CA 92411.
- Muscoy Baker Family Learning Center (a County of San Bernardino public library), 2818 Macy Street, Muscoy, CA 92407.



Public Review Period: CEQA requires a 30-day public review period for a NOP. In accordance with CEQA, should you have any comments, please provide a written response to this NOP within the 30-day NOP period between **September 23, 2019** and **October 22, 2019**.

Public Comments: The City requests your careful review and consideration of this notice, and it invites **written comments** from interested agencies, persons, and organizations regarding EIR preparation. Please indicate a contact person for your agency or organization. Comments in response to this notice must be submitted to the City of San Bernardino by **5 PM on October 22, 2019**

Lead Agency Contact: All comments should be submitted in writing to:

City of San Bernardino Community Development Department
Attn: Mr. Oliver Mujica, Planning Division Manager
290 North D Street
San Bernardino, CA 92401
Mujica_Ol@SBCity.org

Environmental Review Process: Following completion of the 30-day Notice of Preparation public review period, the City will incorporate relevant information into the Draft EIR, including results of public scoping and technical studies. The Draft EIR will be circulated for public review and comment for a minimum 45-day public review period. All individuals who have requested to be notified in writing will be placed on a Notice of Availability List for the Draft EIR.

Following receipt of all written comments on the Draft EIR, the City will prepare Responses to Comments as part of the Final EIR, which will be considered and acted upon by the City's Planning Commission and City Council.

Probable Environmental Effects: The City has determined that an EIR is required to address potential environmental impacts resulting from the proposed Project. As permitted in State CEQA Guidelines § 15060(d), the preparation of an Initial Study is not required. The EIR's scope will be based upon information gathered through the NOP scoping process.

The EIR's purpose is to inform decision-makers and the public of the proposed Project's environmental effects, provide environmental information sufficient to evaluate the proposed Project and its potential to cause significant environmental effects, examine methods of reducing adverse environmental impacts, and consider alternatives to the proposed Project. The EIR will be prepared following City procedures and the State CEQA Guidelines and will, at a minimum, include the following:

- Description of the proposed Project,
- Description of the existing environmental setting,
- Assessment of the Project's potential environmental impacts,



- Mitigation measures to avoid or reduce the Project's potential environmental impacts,
- Assessment of cumulative impacts,
- Identification and assessment of alternatives to the proposed Project, and
- Other required information pursuant to CEQA.

Summary of Key Environmental Issues: The EIR will evaluate potential Project impacts for each of the following environmental issues:

- | | |
|--|----------------------------------|
| • Aesthetics, | • Hydrology and Water Quality, |
| • Air Quality, | • Land Use and Planning, |
| • Biological Resources, | • Noise, |
| • Cultural Resources, | • Population and Housing, |
| • Energy, | • Public Services, |
| • Geology, Soils, and Paleontological Resources, | • Transportation, |
| • Greenhouse Gas Emissions, | • Tribal Cultural Resources, and |
| • Hazards and Hazardous Materials, | • Utilities and Service Systems. |

The following environmental issues will not be addressed in detail in the EIR given they are either not present in the Project area or the Project is incapable of resulting in impacts concerning these issues due to its location, nature, and scale:

- | | |
|---------------------------------------|---|
| • Agriculture and Forestry Resources, | • Recreation (Recreational Facilities), and |
| • Mineral Resources, | • Wildfire. |

Other CEQA-mandated sections including alternatives, cumulative impacts, and growth inducement, among others, will also be evaluated in the EIR.

Attachments

Attachment A: Summary Project Description



Project Study Area / Alignment

Kimley»Horn

AUGUST 2019



BNSF Ono Lead Extension Project EIR

Exhibit 1: Regional Vicinity Map



Project Study Area / Alignment

Kimley»Horn

AUGUST 2019



BNSF Ono Lead Extension Project EIR

Exhibit 2: Local Vicinity Map



ATTACHMENT A: SUMMARY PROJECT DESCRIPTION

PROJECT OVERVIEW

The BNSF Ono Lead Track Extension Project proposes to install a fourth lead track¹ extending the existing BNSF San Bernardino Intermodal Facility (SBD Intermodal)² A Yard ("A Yard") lead track to two existing Ono Storage Sidings.³ The Project would involve construction of a fourth lead track within/along approximately 4.3 miles of existing BNSF corridor generally from the BNSF crossing at State Street/University Parkway on the north to the existing SBD Intermodal at West 5th Street on the south. The proposed changes would improve the A Yard's ability to assemble and hold outbound trains, as well as move around railroad cars (i.e., switch out the yard) without obstructing mainline movements. The Project does not propose to increase rail line operations; instead it would improve the A Yard's operational efficiency by reducing train congestion along the existing lead tracks and reducing train idling, as they wait to enter and exit the A Yard. The Project proposes stormwater drainage/water quality, circulation/roadway, signal, and utility improvements/ modifications that are ancillary and related to the lead track extension. Partial and full property acquisitions would be required outside of the BNSF corridor to accommodate the proposed Project.

PROJECT LOCATION AND SETTING

The Project site, which is comprised of two dis-contiguous segments (i.e., northern and southern), is in southwest County of San Bernardino (County). The southern track segment comprises most of the Project area and is in the northwest portion of the City of San Bernardino; see **Exhibit 1: Regional Vicinity Map**. The northern track segment, which is separated by approximately 1.2 linear miles from the southern track segment, is in Muscoy, an unincorporated San Bernardino County community. The Project area extends approximately 4.3 linear miles along the BNSF corridor adjacent to/west of Interstate 215 (I-215).

The Project area's northern terminus is at the BNSF crossing at State Street/University Parkway and its southern terminus is at West 5th Street, just north of the A Yard; see **Exhibit 2: Site Vicinity Map**. Within those limits, the proposed northern and southern segments, are as follows:

- Northern Track Segment: approximately 0.3 linear miles, MP 76.5 to MP 76.8,
- Southern Track Segment: approximately 2.8 linear miles, MP 78.0 to MP 80.8, and
- Gap Between Northern and Southern Track Segments: approximately 1.2 linear miles, MP 76.8 to MP 78.0, where no improvements are proposed.

The approximately 41-acre Project site consists of the existing BNSF corridor and adjacent properties where ground disturbances (including temporary construction staging) and/or property acquisitions

¹ A non-main track from which several other tracks branch within a short distance.

² This facility handles freight transport in an intermodal container or vehicle, using multiple modes of transportation (e.g., rail and truck), without handling the freight itself when changing modes.

³ A track section that is off the main line that is used for storing rolling stock.



would occur; see **Exhibit 2**. The BNSF corridor consists of an existing three and four mainline track railroad system with associated signal poles, electrical poles, and cabinets. The adjacent properties include industrial, commercial, and residential (single- and multi-family) land uses, vacant lots, and City roadways. Approximately 52 residential dwelling units (attached and detached) and eight commercial/ industrial buildings are located on the adjacent properties where ground disturbances or property acquisitions would occur. Additionally, the adjacent properties include approximately 34 vacant lots totaling approximately 8.5 acres.

Underground and overhead utility lines are present throughout the Project area. Two north-south oriented roadways (i.e., Cajon Boulevard and North I Street) and multiple east-west oriented roadways traverse the Project site/adjacent area.

PROJECT COMPONENTS

The Ono Lead Track Extension Project consists of the following main components:

- **A fourth lead track extension** consisting of approximately 2.8 miles of new track, with associated road bed improvements. Storm drainage/water quality, circulation/roadway, signal, and utility improvements/modifications ancillary and related to the lead track extension are necessary, as described below.
- **Stormwater drainage/water quality improvements** are proposed at numerous locations along the Project route. Runoff would be collected by existing/proposed swales along the west side of the tracks, where it would be routed to as many as 10 infiltration basins (totaling approximately 10.0 acres) situated adjacent to/west of the BNSF corridor.
- **Circulation/roadway improvements/modifications** to multiple City roadways, including vacations, realignments, and cul-de-sacs, as follows:
 - Relocating the existing roadway bend at J Street and 17th Street;
 - Vacating North I Street from 10th Street to 11th Street, and from 14th Street to Evans Place;
 - Closing off access to North I Street at 10th Street, Olive Street, 11th Street, 14th Street, Magnolia Avenue, 15th Street, and Evans Place, and reconstructing the easterly extents of these cross streets as cul-de-sacs;
 - Reconstructing 11th Street at Harris Street from a T-intersection to a roadway bend;
 - Vacating and relocating to the west North I Street from 7th Street to 8th Street;
 - Vacating various City ROW remnants;
 - The following additional street vacations and a cul-de-sac are required for the Project but are already in process by the City:
 - Vacating Home Avenue from North I Street to approximately 200 feet west of North I Street and constructing a cul-de-sac at Home Avenue's new terminus; and
 - Vacating North I Street from Home Avenue to 14th Street.



No new or modified at-grade rail crossings are proposed.

- **Signal improvements/modifications** include relocating and upgrading as many as four cantilevered signals and relocating or removing seven signal bungalows.
- **Utility improvements/modifications** include relocating utility lines that are present within the Project area.
- **Partial and full property acquisitions** totaling approximately 30 acres of adjacent properties as needed to accommodate the Project. Property acquisitions would require removal of as many as 43 dwelling units and approximately 63,000 square feet of non-residential (commercial and industrial) land uses.
- Within the BNSF corridor between the SBD Intermodal A Yard and MP 80.8, request that **City ROW be vacated and conveyed** to the owner of the track.

Construction Schedule and Phasing

Project construction is proposed to occur in one phase and is anticipated to begin in 2020 and be completed in 2023. The proposed construction subphases are:

- Utility Relocations,
- Civil Construction (Roadways, Basins, and Soundwalls), and
- BNSF Track/Signal Construction.

Property acquisition and demolition would occur prior to commencement of the proposed construction.

Project Objectives

- Enhance the effectiveness of goods movement by improving efficiency of train traffic entering/exiting the A Yard in service of BNSF's east-west corridor.
- Improve safety and operational efficiency for the critical BNSF east-west corridor.
- Relieve train traffic congestion along the three existing mainline tracks that service the BNSF east-west corridor by connecting two existing Ono Storage Sidings located near the State Street/University Parkway Grade Separation and extending the existing Ono Storage Siding near Western Avenue south to the A Yard.
- Maintain adequate local and emergency access to land uses adjacent to/west of the Project site.

The EIR will evaluate potential Project impacts for each of the issues discussed below.



Aesthetics. The Project would be mostly located within existing BNSF corridor, but would extend westerly into the adjacent area. Property acquisitions would require removal of residential and non-residential land uses. The EIR will analyze the Project's potential impacts concerning aesthetics (i.e., concerning scenic vistas and scenic resources), as well as the creation of light and glare. Impacts on the visual character of public views of the site and its surroundings will be evaluated.

Air Quality. The EIR will evaluate short-term construction-related and long-term operational emissions concerning potential conflicts with an air quality plan and potential to result in net increases in criteria pollutants. The Project's potential to expose sensitive receptors to pollutant concentrations and create odors will also be evaluated.

Biological Resources. The EIR will evaluate the Project's potential to adversely impact biological resources in and around the Project site, including candidate, sensitive, and special status species, and jurisdictional waters, among others.

Cultural Resources. The EIR will evaluate the Project's potential to cause an adverse change in a historical or archaeological resource. The EIR will also address the potential for discovering cultural resources during ground disturbance activities.

Energy. The EIR will evaluate the Project's potential to result in a significant environmental impact associated with consumption of energy resources, during Project construction and operations. Project consistency with a state or local plan for renewable energy/energy efficiency will be evaluated.

Geology, Soils, and Paleontological Resources. The EIR will evaluate the Project's potential to cause adverse effects involving seismic and geologic hazards. The EIR will also evaluate the potential for discovering paleontological resources during ground disturbance activities.

Greenhouse Gas Emissions (GHG). The EIR will evaluate the Project's potential to generate GHG emissions, including construction-related and operational GHG emissions, which would have a significant impact on the environment. Project consistency with applicable plans, policies, and regulations concerning GHG emissions will also be evaluated.

Hazards and Hazardous Materials. The EIR will evaluate the Project's potential to create a significant hazard to the public or the environment during both Project construction and operations. Potential airport-related safety hazards will also be evaluated.

Hydrology and Water Quality. The EIR will address potential Project effects upon surface water hydrology, water quality, groundwater, and floodplains. The analysis will address stormwater conveyance, water quality treatment, and potential flood hazards. The discussion will include evaluation of compliance with applicable, local, state, and federal regulations.

Land Use and Planning. The EIR will address the Project's consistency with applicable local, state, and federal land use and planning policies and regulations adopted for avoiding or mitigating an



environmental effect. This evaluation will include consistency with the City of San Bernardino General Plan and Municipal Code, along with the County of San Bernardino General Plan and San Bernardino County Code.

Noise. The EIR will evaluate potential noise and vibration impacts during both Project construction and operations associated with the additional fourth track. The EIR's noise and vibration analysis will consider sensitive receptors, such as residential uses, proximate to the Project area.

Population and Housing. The EIR will evaluate potential impacts to adjacent residential and non-residential uses as a result of property acquisitions.

Public Services. The EIR will evaluate the possible effects to public services, including police and fire protection, and schools. The EIR will also address adequacy of emergency access to the Project area, and potential temporary effects upon emergency responders due to proposed circulation/roadway improvements and modifications.

Transportation. The Project proposes circulation and roadway improvements and modifications to multiple City roadways, including vacations, realignments, and cul-de-sacs. The EIR will evaluate potential impacts during Project construction and operations, including potential temporary disruption to existing public streets during Project construction. The Project's effects on the existing transit, bicycle, and pedestrian facilities will also be evaluated.

Tribal Cultural Resources. The EIR will analyze the Project's potential to cause a substantial adverse change in the significance of a tribal cultural resource.

Utility and Service Systems. The Project would require utility improvements/modifications to the stormwater drainage, water, sewer, electrical, natural gas, and telecommunications facilities that exist in the Project area. The EIR will evaluate the potential physical impacts associated with changes to these facilities.

Cumulative Impacts. As required by CEQA, potential cumulative impacts of the Project when added to other reasonably foreseeable projects will be addressed in the EIR. The cumulative projects to be considered will include those from local agencies/districts in the immediate Project area, as well as cumulative rail connections in the local area.

From: [Thomas, Kevin](#)
To: [Garcia, Rita](#); [Fidler, Karina](#)
Subject: Fwd: BNSF Ono Lead Track Extension Project
Date: Monday, October 14, 2019 3:33:41 PM
Attachments: [image001.png](#)
[image002.png](#)

Fyi

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From: Oliver Mujica <Mujica_Ol@sbcity.org>
Sent: Monday, October 14, 2019, 3:22 PM
To: Thomas, Kevin
Subject: FW: BNSF Ono Lead Track Extension Project

Hello Kevin,

FYI



Oliver Mujica
Planning Division Manager
Community & Economic Development
City of San Bernardino
Office: 201 North E Street, 3rd Floor
Mail: 290 North D Street
San Bernardino, CA 92401
O: 909-384-7272, ext. 3332
Mujica_ol@sbcity.org
www.SBCity.org
Please note our new office and mailing address.

*Our office/counter hours are Monday thru Thursday 7:30am – 5:30pm & Friday 7:30am – 4:30pm
I will be out of the office on October 11th and 25th*

From: Jessica Mauck [<mailto:JMauck@sanmanuel-nsn.gov>]
Sent: Monday, October 14, 2019 12:40 PM
To: Oliver Mujica
Subject: BNSF Ono Lead Track Extension Project

Hi Oliver,

Thank you for contacting the San Manuel Band of Mission Indians (SMBMI) regarding the above referenced project. SMBMI appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on 23 Sep 2019, pursuant to

CEQA (as amended, 2015) and CA PRC 21080.3.1. The proposed project area exists within Serrano ancestral territory and, therefore, is of interest to the Tribe.

Due to the nature and location of the proposed project, SMBMI respectfully requests the following for review upon availability, if required for the project:

- Cultural report
- Geotechnical report
- Project plans showing the exact area of proposed disturbance (including depth)

The provision of this information will assist San Manuel Band of Mission Indians in ascertaining how the Tribe will assume consulting party status under CEQA and participate, moving forward, in project review and implementation. Please note that if this information cannot be provided within the Tribe's 30-day response window, the Tribe automatically elects to be a consulting party under CEQA, as stipulated in AB52. If you should have any questions with regard to this matter, please do not hesitate to contact me at your convenience, as I will be your Point of Contact (POC) for SMBMI with respect to this project.

Once again, the San Manuel Band of Mission Indians appreciates the opportunity to comment on the proposed project.

Respectfully,

Jessica Mauck

CULTURAL RESOURCES ANALYST

O: (909) 864-8933 x3249

M: (909) 725-9054

26569 Community Center Drive Highland California 92346



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South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

October 22, 2019

Mujica_Ol@SBCity.org

Oliver Mujica, Planning Division Manager
City of San Bernardino, Community Development Department
290 North D Street
San Bernardino, CA 92401

Notice of Preparation of an Environmental Impact Report for the Proposed BNSF Ono Lead Track Extension Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the EIR upon its completion and public release. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

South Coast AQMD staff is concerned about potential public health impacts of siting rail tracks in close proximity of sensitive land uses, especially in communities that are already heavily affected by air pollution generated from sources, such as, heavy-duty diesel trucks, warehouses, and railyard facilities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES IV), completed in May 2015, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions, and that the areas in San Bernardino County within the South Coast Air Basin have the second highest projected cancer risk of 339 in one million³. Operation of warehouses generates and attracts

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

³ South Coast AQMD. May 2015. *Multiple Air Toxics Exposure Study in the South Coast Air Basin*. Accessed at: <http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf>.

heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks. Thus, cumulative impacts from other sources of air pollution in the context of past, present, and probable future projects in the communities should be evaluated and disclosed.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 “Mitigating the Impact of a Project” of South Coast AQMD’s *CEQA Air Quality Handbook* South Coast AQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

The Proposed Project includes the community of the San Bernardino and Muscoy community. This community is disproportionately impacted by air pollution generated from sources, such as, heavy-duty diesel trucks, warehouses, and railyard facilities. As a result, the San Bernardino and Muscoy community is part of the South Coast AQMD’s AB 617 Community Emission Reduction Program. Through this program the community and South Coast AQMD staff have developed a Community Emissions Reduction Plan that identifies air quality priorities and actions to reduce air pollution in the community. South Coast AQMD staff recommends that the Lead Agency review the Community Emissions Reduction Plan for measures to reduce air quality impacts from the Proposed Project⁴.

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

If implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. For more information on permits, please visit South Coast AQMD’s webpage at:

⁴ South Coast AQMD. The San Bernardino and Muscoy Community Emissions Reduction Plan. Accessed at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-sep6-025a.pdf>.

<http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD's Public Information Center at (909) 396-2001. Much of the information available through the Public Information Center is also available at South Coast AQMD's webpage at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project's air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS/DG

SBC190924-03

Control Number

Raul Raya
914 W. Spruce St.
San Bernardino, Ca. 92410

City of San Bernardino Community Development Department
Attn: Mr. Oliver Mujica, Planning Division Manager
290 North D Street
San Bernardino, Ca., 92401

Re: BNSF Ono Lead Track Extension Project

To whom it may concern,

I, Raul Raya am writing to you and all parties concerning the decision making of this purposed lead track extension project. I am a small business owner at Ybarra's Market at 914 Spruce St. Train tracks run parallel to my business property with approximately 20 feet of separation. There is no safety barrier if anything were to happen. That is pretty darn close. Adding another lead or anything that would encroach my property will hurt my business and property value. With that being said, there has been an obvious increase of train traffic and an increase of pollution. We lose merchandise off the shelves due to the shaking we endure; causing constant clean up of broken glass as well as loss of merchandise. That shaking is felt all throughout the market and the dwelling that is attached to the market. We are an established business in the community and wonder how much damage we've under gone from the train traffic. I am a simple not well educated man. I may not understand everything that you want to propose and how it will affect my business and family. Adding another lead or switch will be detrimental to my business. The thought of selling my property is very much on my mind but who will want to buy a property that close to the tracks. I've made a trip to get information from the planning department but no one wants to give out information. I find it odd that you give us 30 days to turn in comments, questions. Where were the letters letting us know that this was a possibility and setting up town meetings? I request to speak with someone regarding this matter, even if it was in a community meeting setting. I speak English but sometimes I cannot get across what I want to communicate very well and get frustrated and overlooked. Having someone who speaks English and Spanish would be helpful. I hope to hear from someone soon.

Raul Raya
909-889-5605