



# Air Resources Board

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**Matthew Rodriguez**  
Secretary for  
Environmental Protection

**Mary D. Nichols, Chairman**  
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**Edmund G. Brown Jr.**  
Governor

February 1, 2012

Chris Cannon  
Director of Environmental Management  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, California 90731

Dear Mr. Cannon:

The California Air Resources Board (ARB) staff is providing comments regarding the draft Environmental Impact Report (EIR) for the proposed Southern California International Gateway Project (SCIG or the Project), a new near-dock railyard to be built and operated by BNSF Railway (BNSF). Since the Port of Los Angeles (Port) owns and would lease the property to BNSF, the Port is in a unique position to ensure that this railyard sets a new benchmark for environmental leadership, while meeting the need for additional capacity to move international containers by rail.

Increasing rail capacity should ideally be achieved through the expansion of on-dock rail at the ports, which maximizes the efficiency of the freight system and minimizes regional emissions and localized health impacts. To the extent that there are space limitations at the Southern California ports, we recognize the regional air quality and climate benefits of near-dock railyards such as the SCIG facility that can reduce the length of truck trips between the ports and railheads.

Whether on-dock or near-dock rail, siting a new freight hub in a community already highly impacted by diesel pollution carries a responsibility to build and operate a state-of-the-art facility with emissions as close to zero as technologically possible. The proposed SCIG Project includes a number of features that meet this standard, including the electric cargo cranes, the site design to nearly eliminate yard hostlers, and the roadway infrastructure with designated truck routes to direct trucks further away from local residents. This concept needs to be extended to include emerging zero-emission technology for the trucks and locomotives that will serve the facility as well.

ARB staff believes that technology capable of zero-emissions will be available for additional applications in the early years of Project operation. The final project conditions need to support development of this technology and provide for its use to better protect the health of nearby residents from the harmful effects of fine particle pollution (including diesel particulate matter (PM)), ensure the emission reductions required to attain air quality standards for all pollutants, and reduce greenhouse gases.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

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## **Background**

We summarize our understanding of the proposed Project, the existing conditions, and the air quality impacts in the draft EIR to establish the context for our recommendations.

The proposed SCIG railyard is located in Long Beach, a four-mile truck trip from the Ports of Los Angeles and Long Beach. BNSF would divert all port-related containers from the existing BNSF Hobart railyard in downtown Los Angeles, a 24-mile truck trip from the ports, to the new near-dock facility. The SCIG would displace existing trucking operations at the Project site; those operations would relocate immediately south or nearby. BNSF would begin SCIG construction in 2013, initiate operations in 2016, and reach full scale operations by 2023. At capacity, SCIG would handle up to 1.5 million container lifts, two million truck trips, and 2,880 train trips annually.

Immediately north of the Project site is the existing Union Pacific Railroad (UP) Intermodal Container Transfer Facility (ICTF), an intermodal railyard. UP plans to double the capacity of the ICTF railyard this decade. If both the SCIG facility and ICTF expansion are built, they would represent the largest intermodal railyard container complex in the U.S. with a combined annual container lift capacity of three million.

There are a number of schools and residences in close proximity to, and downwind of, the Project site. For example, the Hudson Elementary School and Cabrillo High School are located across the street, about 500 feet from the site boundary.

The draft EIR presents several analyses of the Project's potential air quality impacts at both a regional and local level. The document identifies a regional air quality and climate benefit, largely attributable to the shorter truck trips between the ports and the SCIG facility, as compared to the BNSF Hobart railyard. The draft EIR also assesses the maximum individual cancer risk (risk) to the adjacent neighborhood from Project emissions. Both of the risk estimates that we discuss here reflect SCIG emissions at full capacity and the benefits of adopted ARB and federal regulations that are cutting diesel emissions over time from all sources. If forecasted emissions from the SCIG facility are considered in isolation, the risk is estimated at 48 chances in a million. If emissions from the SCIG facility are compared to the forecasted emissions from existing tenant operations at the site (the No Project alternative), the net increase in the estimated risk is 17 chances in a million.

ARB staff concludes that whatever legal or technical comparison is used, the proposed SCIG facility would increase the health risk in the immediate area and the Project should utilize all existing and emerging zero-emission technology.

## **Recommendations**

ARB staff recommends the following additional actions to support the development, demonstration, and deployment of zero-emission technology to reduce regional emissions and the localized health risk from the proposed SCIG facility. ARB will be an active partner in this effort.

**Trucks:** The draft EIR shows that the majority of the localized cancer risk for the proposed SCIG facility is attributable to diesel drayage trucks. The project condition that the Port is considering to require phase-in of natural gas drayage trucks would reduce the diesel PM over time, but not eliminate the truck emissions that also contribute to fine PM and nitrogen dioxide pollution. Zero-emission trucks are on the cusp of commercialization and the needs of a near-dock railyard are an ideal match for the capabilities of the technology. We believe that use of zero-emission truck technology is feasible in the early years of Project operation, consistent with the California Environmental Quality Act definition:

*"Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.*  
(California Code of Regulations, title 14, section 15364)

ARB staff recommends that the Port and BNSF provide co-funding, facility access, and operational support for a one year demonstration of zero-emission truck technology at a comparable on-dock or near-dock railyard serving the Port of Los Angeles and/or the Port of Long Beach prior to 2015. We would like to participate in this demonstration and have access to the data collected.

We also recommend that in coordination with the agency Technical Working Group for the Clean Air Action Plan, the Port accelerate the first periodic review of new truck technologies from 2023 to 2015. This process should also include consultation with BNSF and the public. The review should focus on truck technology capable of zero emissions in service between the ports and near-dock railyards and specifically assess:

- The technical and operational capability of these trucks, including reliability and durability, for a near-dock duty cycle.
- The incremental cost to purchase and operate these trucks, given liquefied natural gas vehicles as a baseline technology, as well as the estimated per-load cost for a fleet of zero-emission trucks in near-dock service.
- The production capacity to meet the needed volumes for the SCIG (and ICTF) railyards.

- Actions needed to facilitate the deployment of zero-emission truck technology in this service.
- The most expeditious schedule to phase in the use of trucks capable of zero-emission operation for near-dock railyard service.

The results of this review, including the analysis and conclusions of the agency partners in the Technical Working Group, should be documented in a draft report available for public review and comment.

Finally, ARB staff recommends that the Port commit to bring the report described above to the Los Angeles Board of Harbor Commissioners at a public meeting in 2015 and seek a determination of the most expeditious schedule for BNSF to phase in requirements for trucks capable of zero-emission operation. The intent should be to achieve widespread use at the SCIG facility by 2020 and to reflect the schedule in the lease agreement with BNSF.

**Locomotives:** We continue to support the locomotive strategy in the 2010 Clean Air Action Plan, consistent with ARB's 2009 recommendation for the San Pedro Bay Ports to accelerate the turnover of cleaner Tier 4 line-haul locomotives serving port properties as expeditiously as possible following their introduction in 2015, with the goal of 95 percent Tier 4 line haul locomotives serving the ports by 2020<sup>1</sup>. The Project conditions should identify this goal and require the minimum performance standard for locomotive emissions described in Clean Air Action Plan Measure RL-3<sup>2</sup>.

Since 2009, technology developers have begun to explore concepts for locomotives that offer promise of even cleaner technology that could achieve zero-emission operation for limited distances, lower fuel use and cost, and readily integrate into the railroads' national fleet. To support this concept, we further recommend that the Port and BNSF commit to providing co-funding, facility access, and operational support for the development and demonstration of interstate line-haul locomotive technology with zero-emission capability by 2017. This would include, but is not limited to, a hybrid-electric locomotive with all electric capability.

ARB staff also recommends a project condition to ensure that BNSF uses switch locomotives meeting Tier 4 emissions levels at SCIG, starting in 2016. This would clarify and strengthen the current ultra-low emitting switch locomotives provision.

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<sup>1</sup> Air Resources Board, "Recommendations to Implement Further Locomotive and Railyard Emission Reductions," September 9, 2009. (Source: <http://www.arb.ca.gov/railyard/ted/drftrrec090909.pdf>)

<sup>2</sup> Emissions equivalent to at least 50% Tier 4 line-haul locomotives and 40% Tier 3 line-haul locomotives on port properties by 2023.

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**Closing**

ARB staff appreciates the opportunity to comment on the draft EIR. We stand ready to work with the Port and BNSF, as well as the South Coast Air Quality Management District and the U.S. Environmental Protection Agency to make the SCIG Project a true state-of-the-art facility that serves the region's cargo and air quality needs, while protecting the health of its neighbors.

If you have questions, please call me at (916) 322-4204 or contact Ms. Cynthia Marvin, Assistant Chief, Stationary Source Division at (916) 322-7236 or [cmarvin@arb.ca.gov](mailto:cmarvin@arb.ca.gov).

Sincerely,

***Original signed by***

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Deputy Executive Officer

cc: See next page.

Mr. Chris Cannon  
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