

October 23, 2017

Ms. Carrie Bowen
District 7 Director
California Department of Transportation
100 South Main Street, MS16A
Los Angeles, California 90012

Dear Ms. Bowen:

Thank you for the opportunity for the California Air Resources Board (CARB) staff to provide comments to the California Department of Transportation (Caltrans) on the Recirculated Draft Environmental Impact Report Environmental Impact Statement (RDEIR/EIS) and Section 4(f) Evaluation for the I-710 Corridor Project (Project).

In July 2015, Governor Brown issued Executive Order B-32-15, which provides a vision for California's transition to a more efficient, more economically competitive, and less polluting freight transport system. This transition of California's freight transport system is essential to supporting the State's economic development in coming decades while reducing harmful pollution in California communities. The Executive Order identified targets for State agencies to advance these objectives, including deploying over 100,000 freight vehicles and equipment capable of zero emission operation by 2030.

As partners with Caltrans on the Governor's 2016 California Sustainable Freight Action Plan (Plan), CARB staff sees the I-710 project as a proving ground to realize the Plan's vision to transport freight in California on a modern, safe, efficient, and resilient system by "zero emission equipment everywhere feasible, and near-zero emission equipment powered by clean, low-carbon renewable fuels everywhere else." We are optimistic that the decisions Caltrans will make on this major project to include dedicated, zero emission truck lanes will provide landmark leadership to achieve our mutual mobility, environmental, and economic goals, consistent with the Plan and State law.

The Clean Energy and Pollution Act of 2015 Senate Bill (SB) 350 (de León, Chapter 547, Statutes of 2015) established as a State priority the reduction of greenhouse gases through clean energy policies, including widespread transportation electrification, for the benefit of all Californians. Zero emission truck lanes will help transform the State's transportation sector to support widespread electrification. Furthermore, the State of California has recently placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill (AB) 617 (Garcia, Chapter 136, Statutes of 2017).

Ms. Carrie Bowen
October 23, 2017
Page 2

AB 617 is the most significant piece of air quality legislation in decades and highlights the need for further emission reductions in communities with high exposure burdens, like those along the I-710 Corridor.

We strongly support the project Alternative 7 Design ZE (Alternative 7ZE) that includes four truck-only lanes, a clean freight corridor that restricts usage to zero emission trucks, and an automated vehicle control system to steer, brake, and accelerate trucks (allowing for platooning). Dedicated truck lanes create opportunities to adapt to changing technology options with access and pricing approaches that support the transition to a more efficient, zero emission corridor.

These actions are essential to achieve air quality and climate targets, including the increased truck activity on I-710 due to better system performance and the resulting induced demand. Emissions from mobile sources, especially heavy-duty diesel trucks like those traveling the I-710 Corridor are the largest contributor to regional air pollution and the largest impediment to attainment of air quality standards for ozone and fine particulate matter in the South Coast Air Basin. Even with broad deployment of 2010 and newer trucks as required by CARB regulations, the region will need substantial additional emission reductions to attain national ambient air quality standards and protect roadside communities.

CARB staff commends Caltrans for including the zero and near-zero emission freight corridor option and for the commitment to improve air quality and public health as a project objective. For the RDEIR/EIS to provide public transparency on the potential air quality and health impacts of the project, a few elements need to be updated (please see the attached comments for further details).

- The health risk and air quality analysis was prepared with the assumption that two major near-dock rail projects would be approved and fully operational by 2035. These projects are the proposed Southern California International Gateway (SCIG) and the Intermodal Container Transfer Facility (ICTF) Modernization Plan. Given their current status, the health risk and air quality results should be revised to reflect the higher anticipated I-710 truck traffic levels without the projects.
- The health risk and air quality results also do not include an analysis of peak emissions from the overlap of construction and operations. These analyses should be revised to reflect the impacts during the peak emissions year.

We appreciate the opportunity to comment on the RDEIR/EIS, and CARB staff is available to provide assistance to Caltrans on vehicle technologies, emission reduction

Ms. Carrie Bowen
October 23, 2017
Page 3

strategies, or other issues, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the Final EIR/EIS as part of the comment period.

If you have any questions, please call me at (916) 445-4383 or have your staff contact Richard Boyd, Chief, Risk Reduction Branch, at (916) 322-8285 or via email at Richard.Boyd@arb.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Corey', with a long horizontal stroke extending to the right.

Richard W. Corey
Executive Officer

Attachment

cc: See next page.

Ms. Carrie Bowen
October 23, 2017
Page 4

cc: Elizabeth Adams
Acting Director
Air Division, Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Malcolm Dougherty, Director
California Department of Transportation
1120 N Street
Sacramento, California 95814

Wayne Nastri
Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765-4182

Kate White
Deputy Secretary, Environmental Policy and Housing Coordination
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, California 95814

State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Richard Boyd, Chief
Risk Reduction Branch
Transportation and Toxics Division

Attachment

California Air Resources Board Staff Comments and Recommendations on I-170 Corridor Project Recirculated Draft Environmental Impact Report/ Supplemental Draft Impact Statement

Project Description

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), the Gateway Cities Council of Governments, the Southern California Association of Governments, the Ports of Los Angeles and Long Beach, and the Interstate 5 Joint Powers Authority proposes to improve Interstate 710 (I-710) in Los Angeles County between Ocean Boulevard and State Route 60 (SR-60).

I-710 is a major north-south interstate freeway connecting the City of Long Beach to central Los Angeles and beyond. I-710 is a significant freight artery for the region and serves as the principal transportation connection for road-borne cargo between the Ports of Los Angeles and Long Beach, located at the southern end of I-710 and the BNSF and Union Pacific intermodal rail yards in the Cities of Commerce and Vernon, as well as intermodal warehouses along I-710. The existing I-710 mainline generally consists of eight general-purpose lanes north of Interstate 405 (I-405) and six general-purpose lanes south of I-405.

The study area includes the portion of I-710 from Ocean Boulevard in Long Beach to SR-60, a distance of approximately 18 miles. The study area extends one mile east and west of I-710 mainline at I-405, State Route 91, Interstate 105, and I-5 interchanges.

The existing I-710 freeway has elevated levels of health risks related to high levels of diesel particulate emissions, traffic congestion, high accident rates, and outdated design roadway features that create operational problems. To address these issues, Caltrans previously released a Draft Environmental Impact Report in 2012; however, due to extensive comments received, Caltrans developed and analyzed a new set of alternatives (5C and 7) in the Recirculated Draft Environmental Impact Report Supplemental Draft Impact Statement (RDEIR/EIS) released July 2017. The new alternatives are:

- Alternative 5C: Modernize I-710 Freeway: This alternative includes widening I-710 and adding two mixed-flow lanes, two truck by-pass lanes, widening bridges, adding bike lanes, arterial system improvements (modify freeway access, shift centerline), incorporating traffic demand management and Intelligent Traffic System (congestion relief signal upgrades, traffic calming), and focused improvements (structural, visual, irrigation, barriers).

- Alternative 7: I-710 Modernization and Added Near-Zero/ Zero Emission (NZ/ZE) Freight Corridor (Freight Corridor): Includes all of 5C, but rather than adding mixed-flow lanes and the truck by-pass lanes, Alternative 7 includes four NZ/ZE truck-only lanes and an automated vehicle control system feature that will steer, brake, and accelerate trucks allowing for platooning. Design Option 7ZE would restrict the Freight Corridor to only allow access to zero emission trucks beginning 2035.

Air Quality, Greenhouse Gas, and Health Risk Assessment (HRA) Technical Study

Results of the RDEIR/EIS indicate that projected I-710 operational emissions, in general, decline between now and 2035 as adopted clean vehicle and fuels regulations cut emissions faster than growth in vehicle miles traveled (VMT) increases emissions. This is true for the 2035 No Project or No Build scenario, as well as the two I-710 Project alternatives. However, the Alternative 7ZE results in the lowest emissions and health risk in 2035.

Preferred Alternative Recommendation

As indicated in our letter, we support Alternative 7 Design Option ZE (Alternative 7ZE) as the Preferred Alternative. By creating this dedicated freight corridor, the Project will support technology to transition to zero emission operation in highly impacted communities. It will also establish the foundation for a longer zero emission freight corridor connecting the seaports, rail yards, and inland distribution centers.

Adoption of zero emission technologies is critical to protect the health of communities near the Project study area. The restriction of use to ZE/NZE trucks on the freight corridor as part of Alternative 7 rather than conventional diesel trucks will help reduce oxides of nitrogen (NOx) emissions to help attain national ambient air quality standards in the South Coast Air Basin, cut toxic diesel particulate matter (diesel PM) to protect community health, and reduce greenhouse gases (GHG) to combat climate change.

Comments

Air Quality, Greenhouse Gas, and Health Risk Assessment (HRA) Technical Study

- 1) Truck volumes: The proposed SCIG and ICTF Modernization projects to expand near-dock rail capacity are included in the port growth assumptions that were approved for use in traffic forecasting for port trucks and the baseline scenario developed for the RDEIR/EIS (page 1-31). These two intermodal projects would shift volumes of containers from truck to rail; but there is no certainty that these projects will be completed.

The RDEIR/EIS appropriately identifies port truck volume projections both with and without these near-dock rail projects. Without these projects, the RDEIR/EIS indicates there would be an additional 5,800-8,500 truck trips per day on the I-710. However, the HRA and air quality analysis were conducted assuming that these two intermodal projects are operational in 2035. Table 38 in the Traffic Demand Methodology Technical Memorandum (June 2017) indicates port truck volumes without the SCIG and ICTF projects would increase, ranging from 14 to 134 percent, along various segments of I-710. Caltrans should update the HRA and air quality analyses to capture the emissions and health impacts from this higher truck activity.

- 2) Appendix E, Section 2, Hazard Identification, Page E-2: Operational emissions were used to estimate potential health risk impacts. The analysis should be updated to include any overlapping operational and construction emissions that produce the peak estimated emission and risk levels.
- 3) Appendix C, Section 1, Introduction, Page C-1: The air quality and health risk analyses used 2012 as a baseline as compared to 2035 build alternatives. Caltrans should include analyses for interim years 2023 and 2030 for combined operational and construction emissions, including the peak year recommended in Item 2, above.
- 4) Figure ES-7: Figure ES-7 presents the maximum modeled cancer risk for Project alternatives and baselines. Caltrans should include additional tables showing detail on the individual Mobile Source Air Toxics that contribute to the risk. Presenting the maximum risk by individual toxic compound will provide the public with a more comprehensive understanding of the Project.

Freight Corridor Facility

CARB would welcome the opportunity to work with Caltrans to define how the Freight Corridor will be managed under Alternative 7 to maximize fuel efficiency and emission reductions across the corridor, as well as to incentivize ZE/NZE technology. The standards that define NZE on the corridor can be updated periodically to reflect and support the current state of commercialized technology. Additionally, the infrastructure installed to manage the facility should be flexible enough to support real-time management and periodic standard updates (e.g., infrastructure similar to high-occupancy toll lanes using radio frequency identification technology).

Mitigation Measures

Pursuant to the California Environmental Quality Act (CEQA), (see Cal. Pub. Resources Code § 21081; Title 14 CCR § 15126.2) to be adequate, mitigation measures should be specific, feasible actions that will reduce or avoid significant adverse environmental impacts, and must be enforceable and measurable. For each of the mitigation measures, the lead agency should identify measurable performance standards by which the success of the mitigation can be determined, as well as the relevant methods for monitoring that success.

- 1) CON-AQ-15 indicates that construction equipment used will meet U.S. EPA Tier 4 emission standards and CARB's requirements for off-road engines, depending on the responsible agency that administers the construction contract and availability of equipment. If Metro administers the construction contract, then Metro's Green Construction Policy would be utilized. Based on the elements of this policy, it is less stringent than using equipment that meets U.S. EPA Tier 4 emission standards. To achieve the greatest reductions in diesel emissions from off-road equipment, we recommend that Caltrans expand this mitigation to require that all off-road construction equipment greater than 25 horsepower used on the Project site meets U.S. EPA Tier 4 emission standards, regardless of who administers the contract.

Given construction is scheduled to start in 2020 and Tier 4 equipment became available as early as 2008 for some horsepower categories, with the rest being made available in the 2012 timeframe, it is technically feasible to require that all Tier 4 equipment be used. To increase the enforceability of this mitigation, we recommend that Caltrans require the responsible agency administering the construction contract enter into contractual agreements with construction companies capable of meeting this requirement.

- 2) CON-AQ-16 indicates Caltrans will instruct the construction contractor to comply with CARB's anti-idling rule, which prohibits diesel truck idling in excess of five minutes. Given that Project construction is estimated to last seven years, Caltrans can eliminate excess emissions by requiring that the contractors limit idling by diesel on-road construction trucks and off-road equipment to three minutes.
- 3) CON-AQ-17 indicates that on-road heavy-duty trucks must meet 2007 or cleaner standards, and comply with State regulations during construction activities. CARB already requires trucks fleets to transition to 2010 or later emission standards by 2023 or earlier. At a minimum, on-road trucks over 14,000 pounds should meet 2010 or newer engine standards. For additional, feasible mitigation, we recommend that Caltrans offer extra points in the competitive scoring process to bidders with trucks that: are zero emission, certified to any of CARB's optional low NOx standards, or qualify for CARB's Hybrid Truck and Bus Voucher Incentive Project.