



South Coast Air Quality Management District

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E-Mailed: September 13, 2011

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Mr. Zak Gonzalez
City of Carson
701 E. Carson St.
P.O. Box 6234
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Review of the Negative Declaration (ND) for the Proposed Conditional Use Permit (CUP) No. 875-11

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final environmental document as appropriate.

The AQMD staff recommends that the proposed project include enforceable conditions to ensure regional air quality impacts from the project's operational activities remain insignificant. Specifically, the air quality analysis provided in the ND assumes a NO_x emissions factor of 8.82 grams per brake horsepower-hour (g/bhp-hr) for rail emissions associated with the proposed project. This assumes that the locomotives meet Environmental Protection Agency's (EPA's) Tier-2 NO_x emissions standard. Therefore, the AQMD staff recommends that the lead agency include a condition in the CUP to properly reflect the EPA's Tier-2 NO_x emissions standard for switch cycle locomotives of 8.1g/bhp-hr¹ or 8.82 g/bhp-hr based on the project's air quality analysis. If the lead agency decides not to include this condition then the air quality analysis should be revised to reflect the EPA's projected 2012 in use emissions factor for locomotives of 12.5 g/bhp-hr.²

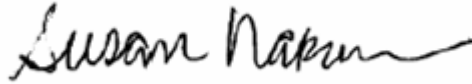
Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the ND. Further, staff is available to work with the lead agency

¹ EPA's Tier-2 NO_x Emissions Factor for Line Haul Trains, CFR Title 40 Section 92.8. Accessed at: <http://www.gpo.gov/fdsys/pkg/CFR-2010-title40-vol20/pdf/CFR-2010-title40-vol20-part92.pdf>

²EPA's In-Use Emissions Factors for Locomotives. Available at: <http://www.epa.gov/nonroad/locomotv/420f09025.pdf>

to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura". The signature is fluid and cursive, with a long horizontal flourish at the end.

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment
SN:DG

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Control Number