

US EPA ARCHIVE DOCUMENT



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105  
March 6, 2006

David Valenstein  
Federal Railroad Administration  
1120 Vermont Avenue, NW, MS 20  
Washington, D.C. 20590

Subject: Final Environmental Impact Report/Environmental Impact Statement for the Union Station Run-Through Tracks Project, Los Angeles County, CA (CEQ# 20060033)

Dear Mr. Valenstein:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Report/Environmental Impact Statement (Final EIS) for the Union Station Run-Through Tracks Project in Los Angeles County, California. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The proposed project would extend two of the existing tracks southward from Union Station and provide a new connection into the Burlington Northern Santa Fe Railway mainline on the west side of the Los Angeles River. EPA is supportive of this project, specifically for its potential to reduce train idling and improve the efficiency of commuter train operations at Union Station.

However, based on EPA's review of the Final EIS, EPA has continuing concerns related to analysis of particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) and proposed mitigation to reduce diesel-related emissions. The Los Angeles area has the highest PM<sub>2.5</sub> levels in the nation and locomotive diesel engine operations emit large amounts of nitrogen oxides (NO<sub>x</sub>) and particulate matter (PM). Locomotive engines are significant contributors to air pollution in many of our nation's cities and ports. Although locomotive engines being produced today must meet relatively modest emission requirements set in 1997, they continue to emit large amounts of NO<sub>x</sub> and PM, both of which contribute to serious public health problems, including premature death, increased risk of lung cancer, heart disease, aggravated asthma and other respiratory conditions. For these reasons, EPA recommends that mitigation measures to reduce potential diesel-related emissions be incorporated into the Record of Decision (ROD) for this project, as further described in the enclosure.

We appreciate the opportunity to review the Final EIS. When the ROD is released for public review, please send two copies to the address above (mail code: CED-

2). If you have any questions, please contact me at (415) 972-3988 or Connell Dunning, the lead reviewer for this project. Connell can be reached at 415-947-4161 or [dunning.connell@epa.gov](mailto:dunning.connell@epa.gov).

Sincerely,

/s/

Duane James  
Environmental Review Office

Enclosures: EPA's Detailed Comments  
Summary of Rating Definitions

cc: Gary Iverson, Caltrans District 7

### **Air Quality- PM2.5 Nonattainment**

The Los Angeles area was designated as extreme nonattainment of the National Ambient Air Quality Standard (NAAQS) for particulate matter under 2.5 microns in diameter (PM2.5) on January 5, 2005, after completion of the Draft Environmental Impact Report/Statement (EIS) for the Union Station Run Through Tracks project, but well before the publication of the Final EIS in December 2005. Because the non-attainment designation occurred almost an entire year prior to the release of the Final EIS, this new information should have been incorporated into the Final EIS along with mitigation to reduce impacts. However, the Final EIS did not measure the project's contribution to PM2.5 because "the South Coast Air Basin was not designated for non-attainment of PM2.5 at the time the environmental document was prepared" (Comments and Responses page 12-19). The project area has some of the highest PM2.5 concentrations in the nation. Table 3-2.2 of the Final EIS (page 3-2.3) identifies that during the three year period between 2000 and 2002, PM2.5 air quality measurements near the project site resulted in measured concentrations well over the NAAQS of 15 ug/m3 (year 2000 = 21.9 ug/m3, year 2001 = 22.9 ug/m3, year 2002 = 22.1 ug/m3). This highlights the need for the Federal Railroad Administration (FRA) and Caltrans to identify specific measures to reduce diesel particulate matter emissions.

EPA understands that the intent of the Run-Through Tracks project is to reduce the need for train idling, thereby improving efficiency of train station operation and reducing impacts related to excess idling that would occur without implementation of this enhancement project. Even though this project will ultimately improve efficiency of operations, locomotives represent a significant portion of the emissions inventory in the South Coast Air Basin, adversely affecting regional air quality and exposing large segments of the population to high levels of toxic diesel exhaust. There are opportunities available to further reduce diesel-related impacts to human health that may result from the doubling of Metrolink locomotives expected with implementation of this project.

#### Recommendation:

EPA recommends that FRA and Caltrans analyze the contribution of this project to PM2.5 ambient levels and incorporate the analysis, along with proposed mitigation, into the Record of Decision (ROD).

### **Air Quality - Mitigation Measures**

#### *Passenger Train Operation*

Both the Final and Draft EIS state that mitigation measures are only required under the California Environmental Quality Act. Under the National Environmental Policy Act (NEPA), "all relevant, reasonable mitigation measures that could improve the project are to be identified. Mitigation measures must be considered even for impacts that

by themselves would not be considered significant. (see Council on Environmental Quality (CEQ), 1981, "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations"). CEQ also issued guidance on integrating pollution prevention measures in NEPA documents and NEPA decisions (1993 Memorandum on Pollution Prevention and NEPA).

In EPA's October 14, 2004 comment letter on the Draft EIS, EPA noted that in some sections of the Draft EIS, specific mitigation measures are listed and identified as specific commitments and are introduced in the following format: "The following mitigation measures will be implemented to mitigate...potential impacts" (Police Protection, Cultural Resources, Paleontological Resources), but that mitigation measures are not presented in this format in the Air Quality Section, resulting in the impression that no mitigation measures will be implemented. This comment was addressed in the Final EIS for air quality impact reduction related to fugitive dust only and the Final EIS still includes vague language related to mitigation commitments. For example, page 3-2.16 states that "one practical mitigation measure to help minimize NO<sub>x</sub> (as well as HC and CO) emissions would be to minimize diesel engine idling time by requiring that the engines be shut off when not in use for more than 10 minutes." It is therefore unclear whether or not FRA and Caltrans will implement this mitigation measure.

#### Recommendations:

Consistent with CEQ's guidance, evaluate the feasibility of mitigation to avoid, reduce or compensate for adverse environmental impacts from locomotive operations and present all feasible mitigation and pollution prevention features in the ROD. EPA recommends evaluating the following measures and incorporating them into the ROD where feasible:

- Use alternative fuels, including liquefied natural gas (LNG),
- Incorporate advanced emission control technologies, including selective catalytic reduction (SCR) and diesel particulate filters (DPFs),
- Commit to mandatory idling requirements for locomotives mainly because of the close proximity of locomotives to commuters in Union Station where idling may occur,
- Commit to specific measures for controlling emissions from any head-end power units used for providing heating, lighting, and air conditioning,
- Accelerate the use of low-sulfur fuel, which would accelerate and facilitate the introduction of other control technologies (e.g., PM traps), and
- Require cleanest, newest engine technology.

#### *Project Construction*

EPA continues to recommend that specific construction emissions mitigation measures be committed to during this environmental review process. Plan for fugitive dust control are incorporated into the Final EIS; however, measures to minimize diesel particulate matter (DPM) impacts are not included. Use of newer technologies would

reduce diesel particulate matter in the project area and any use of newer equipment will reduce emissions.

Recommendations:

EPA recommends the following mitigation measures be evaluated for feasibility and included in the Record of Decision in order to reduce impacts associated with diesel particulate matter emissions and toxics from construction-related activities:

- Establish an activity schedule designed to minimize traffic congestion around the construction site,
- Utilize EPA-registered particulate traps and other appropriate controls to reduce emissions of diesel particulate matter and other pollutants at the construction site,
- Locate construction equipment and staging zones away from sensitive receptors such as children and the elderly as well as away from fresh air intakes to buildings and air conditioners,
- Use low sulfur fuel (diesel with 15 parts per million or less),
- Reduce use, trips, and unnecessary idling from heavy equipment,
- Lease newer and cleaner equipment (1996 or newer), and
- Periodically inspect construction sites to ensure construction equipment is properly maintained at all times.