



Serving Sutter and Yuba Counties

September 12, 2014

Amy Million, Principal Planner
Community Development Department
250 East L Street
Benicia, CA 94510

Re: Valero Crude by Rail Project

Dear Ms. Million,

Feather River Air Quality Management District (District) appreciates the opportunity to review and comment on the proposed project to allow the Benicia Valero Refinery to receive a portion of its crude by rail. The District has reviewed the DEIR's analysis of air quality impacts and would like to provide the following comments.

The District administers air quality programs for Yuba and Sutter counties, located northeast of the proposed project. Based on the existing rail lines, prior to arriving at the Roseville Rail Yard, the rail cars carrying the crude will either come through Nevada and travel either over Donner Summit or through the Feather River canyon, or they will come through Oregon¹. Two out of three routes pass through the District's jurisdiction. The District includes two federal nonattainment areas, the Yuba City-Marysville area for the 2006 24-hour fine particulate matter² (PM_{2.5}) standard and the south Sutter portion of the Sacramento Federal Nonattainment Area (SFNA) for ozone³. While the Yuba City-Marysville area has recently seen significant improvements in PM_{2.5} concentrations and has requested redesignation to attainment, the SFNA is a Severe nonattainment area for 8-hour ozone. The DEIR analysis evaluates the project's impact by breaking the emissions into the applicable air districts into which the train will pass between the Roseville Rail Yard and Valero's refinery in Benicia, however there is no evaluation of the impact to the SFNA as a whole. The District recommends that the DEIR consider the impact to the nonattainment areas impacted by the project and whether the project would conflict with the applicable air quality plans^{4,5}.

The DEIR states that estimating criteria and toxic emissions generated by rail transport prior to arrival at the Roseville Rail Yard is too speculative. However, the DEIR is able to perform this

¹ <http://www.up.com/aboutup/reference/maps/>

² <http://www.epa.gov/pmdesignations/2006standards/final/region9.htm>

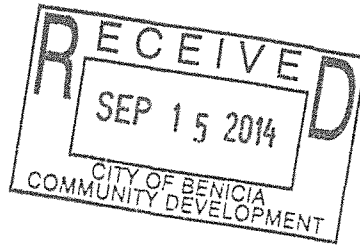
³ <http://www.epa.gov/ozonedesignations/2008standards/final/region9f.htm>

⁴ <http://airquality.org/plans/federal/ozone/8hr1997/2013Revision/index.shtml>

⁵ <http://www.arb.ca.gov/planning/sip/planarea/feathersip.htm>

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analysis to estimate GHG emissions generated in all of California⁶. The District recommends that the DEIR estimate the criteria and toxics emissions from the Roseville Rail Yard to the California border similar to what was done for GHG emissions, and determine the significance of such emissions.

The DEIR should identify whether transit losses from the tank cars are included in the emissions analysis. If they are not, then the DEIR should include transit losses emissions in its impact analysis.

The DEIR should explicitly list all assumptions used to calculate the emissions in Appendix E.3-Air Permit Application February 2013 and E.5-Air Quality and GHG Emissions Supplement. For example, in the Appendix B-4 Cargo Carrier Emissions of Appendix E.3, the tables on pages 3 and 5 appear to assume 1 train per day with 100 cars per train, however throughout the DEIR the project is described as utilizing 2 trains per day with 50 cars per train⁷. Appendix E.5 also does not specify how many trains per day or locomotives per train are being assumed.

While the regulation of railroad locomotives may be federally preempted, mitigating the emissions of the project is not, and the District would recommend that the lead agency consider all forms of mitigation to reduce the impacts of the project including off-site mitigation, especially in areas already not meeting state and federal air quality standards.

The District thanks the City of Benicia for the opportunity to comment on this project. If you have any questions please contact me at (530) 634-7659 ext 210.

Sincerely,



Sondra Spaethe
Air Quality Planner

File: Chron

Cc: BAAQMD, PCAPCD, SMAQMD, YSAQMD

⁶ "Average long line haul from State line to Roseville represents a composite distance between Roseville and the Oregon and Nevada borders = $(100 + 290)/2 = 195$." Appendix E.5 Air Quality and GHG Emissions Supplement page 4.

⁷ Section 1.2 Project Overview page 1-1