



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

October 14, 2021

[ceqacomment@portla.org](mailto:ceqacomment@portla.org)

[CCannon@portla.org](mailto:CCannon@portla.org)

Christopher Cannon, Director  
City of Los Angeles Harbor Department  
Environmental Management Division  
425 South Palos Verdes Street  
San Pedro, California 90731

## **Negative Declaration (ND) for the Proposed Terminal Way Chassis Support Facility Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles Harbor Department is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include information on the Community Emissions Reduction Plan (CERP) for the designated AB 617 Wilmington, Carson, West Long Beach (WCWLB) community in which the Proposed Project is located and recommended changes to strengthen Lease Measure AQ-1 that the Lead Agency should include in the Final ND.

### South Coast AQMD Staff's Summary of Project Description

Based on the ND, the Proposed Project involves the development of a chassis support facility that is designed to support container shipping operations at the Port of Los Angeles. Operations are expected to begin in 2023<sup>1</sup> and would include dispatch, storage, maintenance, repairs, other roadability services, and stop and start functionality on 13.5 acres. Assuming chassis are stacked to a maximum of five-chassis high when stored, the Proposed Project can store a total of 5,240 chassis<sup>2</sup>. Yard equipment to support operations would include two 30,000-pound forklifts, two 10,000-pound forklifts, and two utility tractor rigs, and a mobile fuel service truck would provide diesel and propane for on-site equipment<sup>3</sup>. Truck trips from drayage trucks traveling to and from the Proposed Project would be those already existing and traveling to the Harbor District<sup>4</sup>. The Proposed Project will be allowed to operate under a new Term Permit with the Lead Agency for an initial term of two years with three, consecutive one-year extension options<sup>5</sup>.

---

<sup>1</sup> ND. CalEEMod Output files. Page 1.

<sup>2</sup> ND. Page 10.

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid.* Page 11.

<sup>5</sup> *Ibid.*

South Coast AQMD Staff's Comments*Community Emissions Reduction Plan for the Designated AB 617 WCWLB Community*

The Proposed Project is located in the designated AB 617 WCWLB community. Through the AB 617 program, the community and South Coast AQMD staff have developed a CERP<sup>6</sup> that identifies air quality priorities and actions to reduce air pollution in the community. The South Coast AQMD's Governing Board adopted the CERP for the designated AB 617 WCWLB community in September 2019. Since the adopted CERP existed at the time of the publication of the ND for the Proposed Project in September 2021, the Final ND should include a discussion of the CERP. Additionally, South Coast AQMD staff recommends that the Lead Agency review the actions included in Chapter 5, *Actions to Reduce Air Pollution Emissions or Exposures*, of the adopted CERP to explore whether additional air quality lease measures and mitigation measures can be identified and implemented at the Proposed Project.

*Zero-Emissions Cargo Handling Equipment*

Based on the ND, the Lead Agency has included Lease Measure AQ-1 to require the use of cleanest available cargo handling equipment, subject to technical feasibility assessment that the Lead Agency shall carry out, with input from tenant<sup>7</sup>. The Lead Agency stated that this lease measure would help reach the goal of zero-emission cargo handling equipment by 2030 as outlined in the Clean Air Action Plan 2017 Update<sup>8</sup>.

Technology is transforming the freight and transportation sectors at a rapid speed. Based on the California Air Resources Board's Advanced Clean Fleet Truck Rulemaking<sup>9</sup>, zero-emissions drayage trucks, cargo handling equipment (including yard tractors) are already technically feasible and commercially available. Therefore, 100 percent of cargo handling equipment must use zero-emissions technologies such as electric cargo handling equipment by the Proposed Project's opening day in 2023. This will support the CERP implementation.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the Final ND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final ND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

---

<sup>6</sup>The WCWLB Community Emissions Reduction Plan is available at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-sep6-025c.pdf>.

<sup>7</sup> ND. Page 31.

<sup>8</sup> *Ibid.* Page 31.

<sup>9</sup> CARB. Advanced Clean Fleets. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets>.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC210916-02

Control Number