



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Negative Declaration (ND) for the Proposed John S. Gibson Container Parking Lot 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 recommended revisions to the CEQA regional construction air quality analysis for impacts from cleanup activities and information on South Coast AQMD rules that the Lead Agency should address and include in the Final ND.

South Coast AQMD Staff's Summary of Project Information in the ND

Based on the ND, the Proposed Project consists of construction and operation of a 393-stall container parking lot to load, unload, and store trucks and shipping containers on 18.66 acres and would enable overall increased storage capabilities for shipping containers. Assuming containers are stacked a maximum of five high when stored, a maximum of approximately 1,965 containers can be stored within Proposed Project. Cargo handling equipment would include two zero-emissions battery-electric top handlers. No additional on-site equipment is anticipated to support proposed Project operation¹.

South Coast AQMD Staff's Comments on the ND

CEQA Regional Air Quality Impacts Analysis for Cleanup Activities during Construction

In the Hazards and Hazardous Materials Section of the ND, the Lead Agency stated that a soil management plan would be prepared due to presence of known soil contaminated with total petroleum hydrocarbons and volatile organic compounds (VOCs)². If it is reasonably foreseeable at the time of the release of the ND that the Proposed Project would likely involve excavation, hauling, and disposal of contaminated soil, the Lead Agency should use good faith, best efforts to provide information on the scope, types, and duration of any reasonably foreseeable soil removal and hauling activities, quantify emissions from removing and hauling contaminated soil, and include those emissions in the Proposed Project's regional construction emissions profile to be compared to South Coast AQMD's regional air quality CEQA significance thresholds for

¹ ND, Page 14.

² *Ibid.* Page 11.

construction to determine the level of significance in the Final ND. If those emissions are not included in the Final ND, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record. If the reason for not including them in the Final ND is because soil removal and disposal measures in the soil management plan have not been fully developed or approved prior to the adoption of the Final ND, the Lead Agency should commit to evaluating the air quality impacts from soil removal and hauling activities through a CEQA process when the measures become known and prior to allowing the commencement of any soil removal and hauling activities at the Proposed Project.

South Coast AQMD Rule 1166

Due to the presence of known soil contamination with VOCs, the Lead Agency should ensure any future soil cleanup actions comply with requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil³. The Final ND should also address Rule 1166 requirements for notification and to obtain a required soil mitigation plan prior to any soil handling activities.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the 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.

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, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development and Area Sources

LS
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³ South Coast AQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.