



South Coast Air Quality Management District

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Ralph G. Appy, Ph.D.
Los Angeles Harbor Department
Environmental Management Division
425 South Palos Verdes Street
San Pedro, CA 90731

**Re-Circulated Draft Environmental Impact Report (RDEIR) for
Berth 206 – 209 Interim Container Terminal Reuse project
(July 2005)**

Dear Dr. Appy:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for allowing additional time to submit comments. The additional time was necessary to obtain additional information on the CO hotspots analysis and receive and review the air quality spreadsheets. In the future, please provide all supporting air quality analysis documentation such as spreadsheets, modeling files, etc. with the draft CEQA document to expedite staff review. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Recirculated Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment
SS:CB

LAC050712-05

Control Number

**Re-Circulated Draft Environmental Impact Report (RDEIR) for
Berth 206-209 Interim Container Terminal Reuse Project**

1. **Demolition Emissions:** The lead agency should be aware that there are two sets of Tables D-81 and D-82 and total emissions are inconsistent between each set of tables. The lead agency should clarify which set of tables contains the correct emissions estimates and make sure the emission results in Appendix C are consistent with the emission results in Table 3.2-7 in the RDEIR.
2. **Project Construction Emissions Tables:** The lead agency should be aware that there are two sets of tables D-70 through D-79. Tables D-72 through D-75 are essentially the same. The lead agency should clarify which set of tables in Appendix C contains the correct information and make sure the emission results in Appendix C are consistent with the emission results in Table 3.2-7.
3. **Construction Worker Vehicle Emissions:** Review of the construction worker commute trip emissions uncovered the following typos/inconsistencies. The first footnote to Table 3.2-7 on page 3.2-18 of the DEIR lists 40 construction worker round trips, but Table D-72 in Appendix C shows 35 construction workers. Further, the total vehicle miles traveled (VMT) in Table D-71 in Appendix C should be either 875 or 1000 depending on the correct number of construction worker commute trips. The lead agency should use the correct number of construction workers in the analysis in order to accurately reflect worker trip emissions during the construction phase of the project.
4. **Construction Heavy-Duty On-Road Truck Emissions:** Table D-72 in Appendix C also contains a typo. The table shows a total VMT of only 320 miles per day. Since there are two trucks, total VMT should be $20 \times 2 \times 16 = 640$ miles. Please use the correct VMT to estimate heavy-duty on-road truck emissions for the project.
5. **Operational Emissions:** Staff has reviewed the operational air quality impact analysis spreadsheets provided by the lead agency and it appears that the lead agency calculated emissions from each emission source on a monthly basis and then divided by 30 to obtain a daily average. As a result, daily emission numbers do not represent maximum daily emissions. For example, marine vessel emissions from hotelling will occur over a three to four day period, while the vessel is berthed. Averaging these emissions over a 30-day period results in lower daily emissions. Although this is useful information, the lead agency should also calculate emissions based on peak daily activities from the emissions sources and use this result to determine significance. The tables are also somewhat confusing as many of the titles indicate annual emissions, whereas emissions in the tables are given in terms of tons per month, e.g., P & O Tables 16, 17, 18, 20, 21, etc. Please explain or correct this apparent discrepancy.
6. **Traffic Analysis:** The Harbor Boulevard/Swinford Street/SR 47 off-ramp intersection is not included in the Traffic Analysis. Since the intersection is not included in the Traffic Analysis, it is not apparent in the RDEIR why the intersection was chosen

for the CO hotspots analysis. In response to a phone call by the SCAQMD, the lead agency stated that the Harbor Boulevard/Swinford Street/SR 47 off-ramp was chosen because it is the worst intersection with the worst impacts from all of the proposed Port of Los Angeles projects. The lead agency should demonstrate that this statement is true in the Final EIR by comparing the intersection analyzed in the Traffic Study with the intersection of Harbor Boulevard/Swinford Street/SR 47 off-ramp. The analysis should compare the CO hotspots parameters of each intersection (LOS, geometry, traffic volumes, signal actuation, etc.) to show that the “worse-case” would be the intersection of Harbor Boulevard/Swinford Street/SR 47 off-ramp. The Final EIR should also show that the CO hotspots analysis includes impacts from Berths 206-209. It is not clear from the additional documents sent by the lead agency (Traffic Study for Berths 97-109) that the CO hotspots analysis for the Harbor Boulevard/Swinford Street/SR 47 off-ramp intersection includes impacts from the proposed Berths 206-209 project. The Final EIR should also include the traffic study on which the CO hotspots analysis was based. The Final EIR should also include the traffic study that includes peak hour turning movements on which the CO hotspots analysis was based.