



South Coast Air Quality Management District

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Case Number: ENV-2019-3379-EIR

City of Los Angeles Department of City Planning

200 N. Spring Street, Room 667

Los Angeles, CA 90012

November 17, 2023

Draft Environmental Impact Report (EIR) for Harbor LA Community Plans Update Project (ENV-2019-3379-EIR) (Proposed Project) (SCH No. 2019080248)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comment.

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

Based on the Draft EIR, the Proposed Project consists of amendments to the Harbor Gateway and Wilmington-Harbor City Community Plans, collectively referred to as the Harbor LA Community Plans. These two communities are located in the southern portion of the City of Los Angeles (City) in the harbor area.¹ Community Plans are typically considered a portion of the Land Use Element of the City's General Plan. The Land Use Element helps establish long-range strategies to accommodate the City's projected growth. The City's Land Use Element is comprised of 35 community plans.

Specifically, the Proposed Project consists of amendments to both the text of the policy documents and the General Plan Land Use Maps contained in the Harbor LA Community Plans. The areas of the Harbor Gateway and Wilmington-Harbor City community plans are geographically continuous to each other and encompass a total area of 15.3 square miles.² The Proposed Project, by serving as a regulatory document that will guide future development of the Proposed Project area through the year 2040,³ will aid in accommodating projected future growth in housing demand, population, and employment.⁴ The Proposed Project area is roughly bounded by 120th Street to the north, the cities of Gardena, Torrance, Lomita and Rancho Palos Verdes to the west, the cities of Carson and Long Beach to the east, and the City of San Pedro and the Port of Los Angeles to the south.⁵ Construction is projected to commence in 2024 and end in the buildout year of 2040.⁶ During this period, the Proposed Project anticipates new development of up to 47,202 housing units, a population increase of up to 161,345 individuals, and an employment increase of up to 62,339 individuals.⁷

South Coast AQMD Staff's Comments

¹ Draft EIR. 2.0 Executive Summary. Page 2.0-1.

² *Ibid.* 3.0 Project Description. Page 3.0-6.

³ *Ibid.* 2.0 Executive Summary. Page 2.0-1.

⁴ *Ibid.* 3.0 Project Description. Page 3.0-14.

⁵ *Ibid.* 3.0 Project Description. Page 3.0-5.

⁶ *Ibid.* 3.0 Project Description. Page 3.0-47 through 3.0-48.

⁷ *Ibid.* 3.0 Project Description. Page 3.0-29.

Information on the Community Emissions Reduction Plan (CERP) for the Designated Assembly Bill (AB) 617 Wilmington, Carson, West Long Beach (WCWLB) Community

The Proposed Project is located in an area that includes the AB 617-designated WCWLB community, which is heavily impacted by air pollution generated from sources such as ports, refineries, oil and gas facilities, heavy-duty diesel trucks, warehouses, and railroad activities. As part of the AB 617 process, South Coast AQMD has worked with a Community Steering Committee (CSC) and developed a CERP that identifies air quality priorities and related actions to reduce air pollution in the WCWLB community. The South Coast AQMD Governing Board adopted the WCWLB CERP on September 6, 2019.⁸ The Lead Agency is recommended to review the WCWLB CERP, in particular the Chapter 5 - Actions to Reduce Air Pollution and incorporate into the Final EIR the applicable measures to reduce air quality impacts from the Proposed Project. The WCWLB CERP is available here: <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf>. The Lead Agency is also recommended to explore whether additional measures to mitigate or further reduce emissions can be incorporated into the Final EIR in support of the objectives outlined in the WCWLB CERP.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. 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 Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

BR:DT:SW:EA
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⁸ South Coast AQMD. September 2019. Assembly Bill 617 Wilmington, West Long Beach, Carson Community Emissions Reduction Plan. Accessed at: <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf>.