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Draft Environmental Impact Statement /Environmental Impact Report (EIS/EIR) for the Berths 121-131 Container Terminal Redevelopment Project (Proposed Project) (SCH No.: 2014041050)

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 (LAHD) is the California Environmental Quality Act (CEQA) Lead Agency, and the U.S. Army Corps of Engineers (USACE) is the National Environmental Policy Act (NEPA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff have provided a brief summary of the project information and prepared the following comments, organized by topic of concern.

Summary of Project Information in the Draft EIS/EIR

Based on the Draft EIS/EIR, the Proposed Project seeks a new 30-year permit to 2055 for a future tenant as part of redeveloping Berths 121–131 within the Port of Los Angeles by: 1) relocating five existing wharf cranes to Berths 121–125; 2) demolishing existing wharf structures at Berths 126–129; 3) conducting dredging and sediment disposal to deepen Berths 126–129; 4) reconstructing the rock dike, installing new concrete piles, and developing a new pile-supported concrete wharf at Berths 126–129; 5) installing up to 10 new electrically powered, rail-mounted wharf cranes (100-foot gauge); 6) expanding the West Basin Intermodal Container Transfer Facility (WBCTF) on-dock rail yard by adding up to four loading tracks and installing up to seven electrically powered rail-mounted gantry (RMG) cranes; and 7) making associated backland improvements.[1] The Proposed Project site encompasses approximately 186 acres[2] and is bounded to the north by the TraPac container terminal, Interstate 10, the ConocoPhillips refinery, and the Wilmington community; to the east by the West Basin, the TraPac container terminal, and the ConocoPhillips marine terminal; to the south by the China Shipping container terminal, Pacific Avenue, Front Street, and the San Pedro community; and to the west by Interstate 110, the Port of Los Angeles Distribution Center, and the San Pedro community.[3] A review of aerial imagery shows that the nearest sensitive receptors (e.g., residences) are less than 1,000 feet west of the

[1] Draft EIS/EIR. p. 2-10.
[2] *Ibid*. p. 2-3.
[3] *Ibid*.

Proposed Project boundaries. Construction is anticipated to commence in 2026 and continue for approximately 24 months, concluding in late 2027.[4]

South Coast AQMD Comments

General Conformity Determination and Air Quality Management Plan Compliance

The U.S. Environmental Protection Agency (U.S. EPA) General Conformity Rule (40 CFR Part 93) requires that a conformity determination be conducted for each criteria pollutant or precursor in nonattainment or maintenance areas when the total direct and indirect emissions from a federal action equal or exceed the applicable de minimis thresholds specified in 40 CFR 93.153.

The purpose of the General Conformity Determination (GCD) process is to demonstrate that a proposed federal action will not: 1) cause or contribute to new violations of any National Ambient Air Quality Standard (NAAQS); 2) interfere with provisions in the applicable State Implementation Plan (SIP) for maintenance of any NAAQS; 3) increase the frequency or severity of existing violations of any standard; or 4) delay the timely attainment of any standard. Accordingly, a conformity determination must demonstrate that the proposed federal action is consistent with the most recently approved SIP or Air Quality Management Plan (AQMP).

For the South Coast Air Basin (SCAB), the most recently approved SIP/AQMP by the U.S. EPA is the 2016 AQMP, which was approved on October 1, 2019, and became effective on October 31, 2019. The 2016 AQMP addresses control strategies to attain the 2008 8-hour ozone NAAQS and other federal ozone and PM2.5 (particulate matter less than 2.5 micrometers in diameter) standards. This approval includes the base-year and future-year emission inventories, attainment demonstrations, control strategies, SIP set-aside budgets, and other required SIP elements. Subsequently, South Coast AQMD developed and adopted the 2022 AQMP to address SIP planning requirements for the 2015 8-hour ozone NAAQS. The 2022 AQMP was submitted to the U.S. EPA via the California Air Resources Board (CARB) in February 2023 and is currently under U.S. EPA review. Certain elements included in the 2022 AQMP are currently going through revisions to reflect recent changes in state mobile source regulations.

Pursuant to the General Conformity Rule, project-level analyses should demonstrate conformity with the currently approved SIP, i.e., the 2016 AQMP. The Final EIS/EIR should clearly document whether the Proposed Project's federal action emissions exceed applicable de minimis thresholds and should include either a standalone GCD or a clear explanation demonstrating why a conformity determination is not required. The analysis should clearly identify how project emissions are accounted for within the AQMP framework, including which inventory components, control measures, or growth forecasts are relied upon. Emissions from both the construction and operational phases should be included in the evaluation.

Construction Hauling Truck Trips and Dredged Sediment Disposal Emissions

Chapter 2 (Project Description) of the Draft EIS/EIR indicates that construction activities would include the deepening of Berths 126–129, resulting in the dredging and disposal of approximately

[4] *Ibid*. p. 2-15.

310,000 cubic yards (cy) of sediment.[5] The Draft EIS/EIR assumes that approximately 260,000 cy of dredged sediment would be transported for disposal to an approved inland disposal facility, while the remaining 50,000 cy would be routed to the approved "LA-2 Ocean Dredged Material Disposal Site," which is located approximately 6.8 miles to the south-southwest of the Queens Gate entrance to the Los Angeles/Long Beach Harbor.[6] While Appendix A1 (Air Quality Regulations/Methodology and Air Quality and GHG Emissions) assumes an off-site one-way haul distance ranging from 10 to 32.5 miles for heavy-duty trucks for construction trucks,[7] the Draft EIS/EIR neither specifies the number of truck trips required to transport the 260,000 cy of sediment, nor identifies the exact location(s) of the disposal facility(ies). For example, regional landfills, such as Calabasas Landfill and Antelope Valley Public Landfill, are located approximately 59 to 89 miles one-way from the Proposed Project site. While these facilities are not identified in the Draft EIS/EIR as disposal sites, their distances illustrate that potential upland disposal facilities for the Proposed Project may be located substantially farther than the 32.5-mile haul distance assumed in the emissions analysis. As such, it appears that the potential air quality impacts from these truck trips were underestimated in the Draft EIS/EIR.

In addition, the Draft EIS/EIR indicates that further characterization testing of dredged sediment will be required.[8] In the event that contaminants are identified, compliance with South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil[9] and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants[10] would be required to minimize emissions and protect air quality. Additional detail regarding these regulatory requirements is provided in the South Coast AQMD Air Permits and Role as a Responsible Agency comment of this letter.

Therefore, the Lead Agency is recommended to: 1) identify the intended disposal facility(ies) anticipated to receive the dredged sediment and their location(s) and distance(s) from the Proposed Project site and quantify the number of truck trips that will be needed to haul the dredged sediment; 2) update the emission calculations associated with the actual number of truck trips and accurate travel distances; and 3) incorporate these revisions into the Final EIS/EIR and accordingly update the conclusion of significance, as applicable.

Discrepancies between Draft EIS/EIR, Appendices, and the Supporting Technical Files

During the review of the Draft EIS/EIR, Appendices, and supporting technical files provided by the Lead Agency, the quantifications of emissions for all criteria pollutants contained discrepancies relative to what was presented in the Draft EIS/EIR. For example, Table A presents a comparison between the Draft EIS/EIR and the technical files for the mitigated emissions of nitrogen oxides (NOx) during construction.

[5] *Ibid*. p. 2-11.
[6] *Ibid*.
[7] Appendix A1: Air Quality Regulations/Methodology and Air Quality and GHG Emissions. p. A1-20.
[8] Draft EIS/EIR. p. 2-11.
[9] South Coast AQMD, Rule 1166 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[10] South Coast AQMD, Rule 1466 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf

Table A
Discrepancies Between Draft EIS/EIR and Technical Files for Mitigated NOx Emissions During Construction

Emissions Category	Draft EIS/EIR[11]	Technical Files[12]	Difference
Mitigated Construction Emissions - 2026	293 lbs/day	347 lbs/day	54 lbs/day
Mitigated Construction Emissions – 2027	1,278 lbs/day	1,320 lbs/day	42 lbs/day

While the Draft EIS/EIR concludes that the mitigated construction emissions for years 2026 and 2027 would remain significant and unavoidable for NOx, the quantities of NOx emissions presented in the main body of the Draft EIS/EIR contain different values than those presented in the Appendices and technical files. Such inconsistencies introduce confusion and compromise the ability to conduct an independent verification of the accuracy of the emissions calculations in order to determine whether the significance determinations correlate to the data. Therefore, the Lead Agency is recommended to revise and fully reconcile the construction emissions calculations and summaries for NOx and all other criteria pollutants to ensure consistency across the technical files, the Draft EIS/EIR, and its Appendices. All revisions should be incorporated into the Final EIS/EIR to provide a transparent and consistent basis for all emissions calculations and conclusions.

Construction Material Delivery Trips and the Potential Need for an On-Site Concrete Batch Plant

Chapter 2 (Project Description) of the Draft EIS/EIR indicates that the Proposed Project would reconstruct the rock dike, install new concrete piles, and construct a new concrete and pile-supported wharf at Berths 126–129.[13] Based on the review of the technical files provided by the Lead Agency, the concrete and asphalt materials needed for these activities would be delivered to the Proposed Project site via haul trucks. However, the Draft EIS/EIR neither specifies the number of truck trips that will be required for delivering these materials nor the corresponding travel distances. Thus, the Lead Agency is recommended to identify the total number of truck trips and associated travel distances and update the emission calculations and summaries of the construction material deliveries in the Final EIS/EIR, its Appendices, and technical files to ensure that the assumptions are clearly documented and consistently applied throughout the analysis.

In addition, the Draft EIS/EIR does not indicate whether an on-site concrete batch plant would be required to support the aforementioned construction activities in the event that direct deliveries of concrete and asphalt are insufficient to meet the demands of the Proposed Project. If material demand, supply constraints, or logistical considerations necessitate an on-site batch plant, such an activity would need to be specifically evaluated as part of the construction scenario. In addition, a concrete batch plant would require an air permit from South Coast AQMD. Therefore, the Lead Agency is recommended to explain whether an on-site concrete batch plant is proposed or reasonably foreseeable and update the air quality analysis accordingly. Also, a discussion

[11] Draft EIS/EIR. Table 3.2-12. p. 3.2-56.
[12] Technical File Provided by the Lead Agency, labeled as B121-B131_Proposed_Project_Construction_Emissions_Mitigated_Summary_02102025_nl.
[13] Draft EIS/EIR. p. 2-10.

identifying the applicable permitting requirements from South Coast AQMD and any other agencies with regulatory oversight of the concrete would need to be included in the Draft EIS/EIR. Please also refer to related comments in this letter regarding the applicable South Coast AQMD air quality permits that may be needed and South Coast AQMD's potential role as a responsible agency.

Operational Air Quality Baseline

Chapter 2 (Project Description) of the Draft EIS/EIR identifies calendar year 2019 as the emissions baseline for the Proposed Project, on the basis that it more accurately represents activities at the terminal when compared to calendar year 2014, the year when the Notice of Preparation was released for public review and comment.[14] However, the analysis appears to rely primarily on peak daily emissions during 2019 as the baseline and compares these values to the potential to emit for the Proposed Project in order to determine significance.[15]

From an air quality perspective, the environmental baseline should reflect actual, representative operating conditions and associated emissions. While the use of peak daily emissions may be appropriate in certain circumstances, such as when peak conditions occur frequently and are representative of normal operations levels, the Draft EIS/EIR does not clearly explain or justify why peak daily emissions are representative of baseline conditions for the sources and pollutants evaluated or maximum permitted throughput. As established by the California Supreme Court in *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 321-322. CEQA requires environmental impacts to be evaluated against existing physical conditions, e.g., emissions that are actually occurring under normal operating conditions.[16] Reliance on peak daily emissions or full permitted capacity may not be representative of baseline conditions and doing so can obscure the full magnitude of the potential incremental increases in criteria pollutants, toxic air contaminants, and greenhouse gas emissions attributable to the Proposed Project. As recognized by the Court, such approaches may mask adverse air quality impacts relative to actual baseline conditions, thereby reducing the analytical clarity and integrity of the CEQA significance determination. (*Communities for a Better Env't*, 48 Cal.4th at 322.)

To better understand the implication of baseline selection, South Coast AQMD staff recalculated the baseline as average daily emissions rather than peak daily emissions presented in the Draft EIS/EIR. The average daily emissions were derived using the annual emissions in 2019 (defined as the CEQA baseline year in the Draft EIS/EIR) from the technical files provided by the Lead Agency. Table B presents an example for the 2036 analysis year, showing the results from the Proposed Project minus Draft EIS/EIR baseline and the Proposed Project minus the recalculated baseline emissions.

[14] *Ibid*. p. 2-18.
[15] *Ibid*. p. 3.2-36.
[16] Communities for a Better Environment v. South Coast Air Quality Management District Case Law, available at https://caselaw.findlaw.com/court/ca-supreme-court/1510227.html

Table B
Comparison of Proposed Project Minus Draft EIS/EIR Baseline and Proposed Project Minus South Coast AQMD Recalculated Baseline for the 2036 Analysis Year

	VOC (lbs/day)	CO (lbs/day)	NOx (lbs/day)	PM10 (lbs/day)	PM2.5 (lbs/day)	SOx (lbs/day)
Proposed Project Mitigated Emissions[17]	185	970	3827	150	87	178
Draft EIS/EIR Baseline[18]	131	972	4650	85	62	107
Proposed Project Minus Draft EIS/EIR Baseline	54	-2	-823	65	25	71
South Coast AQMD Air Quality Significance Thresholds During Operation	55	550	55	150	55	150
Significant?	No	No	No	No	No	No
South Coast AQMD Recalculated Baseline	73	614	2208	27	25	43
Proposed Project Minus Recalculated Baseline	**112**	**356**	**1619**	**123**	**62**	**135**
South Coast AQMD Air Quality Significance Thresholds During Operation	55	550	55	150	55	150
Significant?	**Yes**	**No**	**Yes**	**No**	**Yes**	**No**

Note: CO = carbon monoxide, VOC = volatile organic compounds, PM10 = particle matter less than 10 micrometers in diameter, SOx = Sulfur oxides

Based on the recalculated baseline, the significance impact determination across the multiple analysis years results would change/worsen. Specifically, the Draft EIS/EIR concluded that the Proposed Project, after mitigation measures, will result in significant and unavoidable impacts only for NOx in 2028, whereas the application of South Coast AQMD recalculated baseline indicates significant and unavoidable impacts for multiple criteria pollutants across all analysis years. A comparison of the Draft EIS/EIR conclusions and what would occur if the South Coast AQMD recalculated baseline is applied is summarized in Table C.

[17] Draft EIS/EIR. p. 3.2-74.
[18] *Ibid*. p. 3.2-37.

Table C
Comparison of Conclusions in Draft EIS/EIR vs. Revised Conclusions After Applying South Coast AQMD Recalculated Baseline

Analysis Year(s)	Draft EIS/EIR Impacts Conclusion	Impacts Conclusion After Applying South Coast AQMD Recalculated Baseline
2026	LTS	SU for NOx and CO
2027	LTS	SU for NOx and CO
2028	SU for NOx	SU for NOx and VOC
2036	LTS	SU for NOx, VOC, and PM2.5
2050/2055/2062	LTS	SU for VOC and PM2.5

*LTS = Less Than Significant
*SU = Significant and Unavoidable

In addition, South Coast AQMD also notes that in 2021, the terminal permit transferred from Yang Ming Marine Transport Corporation to Everglades Company Terminal, Inc. (now Total Investment Limited (TiL)). If the Port elects to use one or more recent years as the operational baseline, the Final EIS/EIR should clearly explain whether and how terminal operations, throughput, equipment usage, or activity levels differ as a result of the change in terminal operator. Any revised baseline year(s) should be supported by substantial evidence demonstrating that the selected conditions are representative of normal ongoing operations.

Therefore, the Lead Agency is recommended to: 1) either revise the operational baseline to reflect average actual emissions representative of normal operations (e.g. an annual or multi-year period); or 2) provide a clear, evidence-based explanation demonstrating why the use of peak daily emissions is appropriate and representative for the sources and pollutants analyzed. In either case, the Lead Agency should calculate incremental difference between the post-project emissions and the selected baseline, evaluate those incremental emissions against applicable air quality significance thresholds to determine the level of significance for each pollutant and apply all feasible mitigation measures to reduce or eliminate the potential impacts.

Impacts from Terminal with Secondary Right to Use Berths 121-131

South Coast AQMD staff understands that TiL (formerly Everglades Company Terminal) is the current tenant and permit holder of Berths 121-127, and previously, Yang Ming was the tenant and permit holder for Berths 121-131. Meanwhile, China Shipping Holding Company is the tenant and permit holder for the adjacent Berths 97-109 and has the secondary right to use Berths 121-131, which means that cargo containers destined to or departing from the China Shipping Terminal are allowed to, at a minimum, pass through the premises of the TiL/Everglades/Yang Ming Terminal to be loaded to or unloaded from vessels berthing at Berths 121-131. According to the 2025 Final Revised Supplemental Environmental Impact Report for the China Shipping Terminal project,[19] the two terminals further share the use of truck gate complex and the on-dock intermodal railyard, the latter of which is part of the proposed terminal redevelopment project in question. Moreover, South Coast AQMD staff also understands that the West Basin Container Terminal (WBCT) has long been the contractor that manages the day-to-day operation of these

[19] Final Revised Supplemental Environmental Impact Report for the China Shipping Terminal available at https://files.ceqanet.lci.ca.gov/204259-12/attachment/TWXG8fR2EykjBhKsxMs-4XdasNyvtiW8NMfUySvUB1f_7QknCBvi725BTE4TR8cPs3FxMpTV_pY_Cbws0

two adjacent terminals, owns the cargo handling equipment shared between terminals, and the two terminals are essentially operated as if they are one single terminal.[20] Given these circumstances, any environmental impacts resulting from the Proposed Project at Berths 121-131 must also include potential impacts resulting from any foreseeable changes in activities and cargo throughput associated with the China Shipping Terminal.

Operational Off-Site Rail Emissions

Table 3.2-22 (Peak Daily Operational Emissions – Proposed Project) of the Draft EIS/EIR identifies both unmitigated and mitigated operational emissions for years 2026 through 2062. The analysis concluded that NOx emissions would exceed the South Coast AQMD regional operational threshold and would remain significant and unavoidable after mitigation is applied.[21]

The methodology and accounting of the off-site rail emissions, as summarized in Table 3.2-22 and quantified in the supporting technical files provided by the Lead Agency, appear to be inconsistent. Specifically, the technical files identify three primary components of off-site rail emissions: 1) line-haul travel emissions, which are segmented into two geographic categories: operations occurring within the SCAB and between the SCAB boundary and the California border; 2) in-yard line-haul emissions; and 3) in-yard switcher emissions. Meanwhile, the total emissions presented in the Draft EIS/EIR appear to include the in-yard line-haul and switcher emissions plus only the portion of the line-haul travel emissions associated within the SCAB boundary.

It is important to note that South Coast AQMD's jurisdiction includes the four-county South Coast Air Basin (all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties), as well as the Riverside County portion of the Salton Sea Air Basin and the non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin. Excluding the emissions from line-haul travel occurring outside of SCAB but within South Coast AQMD jurisdiction, as well as emissions occurring outside of the South Coast AQMD jurisdiction but within California, may have resulted in an underestimation of total operational emission impacts from these activities. This issue is particularly prescient for NOx, given that locomotive activity is a substantial contributor to regional NOx emissions inventories within SCAB and elsewhere throughout California. By stopping at the SCAB border, the analysis does not fully capture the Proposed Project's contribution to regional air quality impacts within South Coast AQMD's jurisdiction.

Moreover, since the Proposed Project's off-site rail operations would transport goods beyond the SCAB boundary and potentially through multiple air basins within California, the analysis should account for emissions along the full extent of the rail corridor. Emissions generated outside of the SCAB boundary would occur within South Coast AQMD jurisdiction as well as within other air districts and should be quantified and evaluated against the applicable significance thresholds of those jurisdictions, where such thresholds exist. By focusing the emissions analysis and significance determination primarily on the SCAB region, the Draft EIS/EIR may not fully disclose the Proposed Project's total regional air quality impacts across all affected areas within South Coast AQMD's entire jurisdiction as well as outside of South Coast AQMD's jurisdiction

[20] Proposed Fourth Amendment to Permit No.999 and Proposed Third Amendment to Permit No. 787, available at https://kentico.portoflosangeles.org/getmedia/1ed4f61e-caf8-4737-a7a3-1f9cbe172ded/121610_Item_9_Board_Report_CS-YM

[21] Draft EIS/EIR. p. 3.2-72 to 3.2-78.

but in other air districts within the California border. A more comprehensive approach would include a geographic breakdown of rail emissions by air basin and a comparison to the relevant air district thresholds or other appropriate regional impact metrics.

To ensure an accurate and complete operational emissions analysis, the Lead Agency is recommended to: 1) include all locomotive emissions associated with the Proposed Project, including those occurring between: a) the SCAB boundary and the South Coast AQMD boundary, b) out of the South Coast AQMD boundary to other air district boundaries, including the California state border, as applicable, and provide a geographic breakdown of emissions by air district; 2) evaluate emissions occurring within each affected air district against the applicable significance thresholds or other appropriate regional impact metrics, where such thresholds exist; and 3) fully disclosed, and the resulting impact conclusions should be updated as necessary to reflect the revised emissions estimates.

For reference, the Tesoro Los Angeles Refinery – Integration and Compliance Project[22] provided an example of a multi-jurisdictional analysis. That project analyzed the operational impacts, specifically rail emissions, not only within but also outside South Coast AMQD's jurisdiction, calculating the rail emissions within each affected air district to determine if the project would result in significant impacts elsewhere in California.

Operational Off-Site Truck Emissions

Similar to the aforementioned concerns identified for off-site rail emissions, the off-site truck emissions summarized in Table 3.2-22 are compared to South Coast AQMD operational significance thresholds; however, the analysis appears to be confined to only truck activity occurring within SCAB, even though, as noted earlier in this letter, South Coast AQMD's jurisdiction extends beyond the SCAB boundary. Given the nature of the Proposed Project, truck trips appear capable of extending beyond SCAB but both within and outside of South Coast AQMD jurisdiction to serve regional and potentially statewide destinations. Furthermore, Chapter 2 (Project Description) states that approximately 10 percent (%) of those truck trips would transport intermodal cargo to off-dock and near-dock railyards, while the remaining trips would carry local cargo to warehouses and transloading facilities within roughly a 500-mile radius of the Port[23] which encompasses most of California, substantial portions of Arizona, southern Nevada, and northern Baja California in Mexico.

As a result, the current approach taken in the Draft EIS/EIR does not appear to capture the entire geographic scope of the potential emissions associated with off-site truck travel since emissions generated outside the SCAB could occur within South Coast AQMD as well as in other air basins under the jurisdiction of different air districts within California. To more accurately characterize the Proposed Project's regional air quality impacts, the Lead Agency is recommended to quantify emissions along the broader truck travel network and assess those emissions in the context of the applicable thresholds or relevant criteria used by the affected air districts in the Final EIS/EIR.

[22] Tesoro Los Angeles Refinery Integration and Compliance Project available at https://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2017/tesorolaric/tesoro_feir.pdf
[23] Draft EIS/EIR. p. 2-16.

Clarification Regarding Emission Calculations and Dispersion Modeling

Based on the review of AERMOD dispersion modeling and the technical files provided by the Lead Agency, the identification and classification of emission sources are unclear. Specifically, while each emission source in AERMOD is assigned to a unique source ID, the Draft EIS/EIR and its appendices do not clearly explain the correlation and type of source represented by each ID (e.g., off-site truck traffic, off-site rail activity, on-site rail line haul). This lack of clarity limits the ability to verify the accuracy of source characterization, emission allocation, and modeling assumptions used in the dispersion analysis.

Due to these uncertainties, South Coast AQMD staff requested additional technical files to help identify and confirm each emission source included in the AERMOD modeling. However, the Draft EIS/EIR does not provide sufficient detail regarding source identification or source categorization. Therefore, the Lead Agency is recommended to revise the Final EIS/EIR to clearly identify each AERMOD source ID, its corresponding source category, and all associated modeling assumptions used to represent that source.

Oceangoing Vessels Timestamps in Technical Files

Based on the review of oceangoing vessels (OGV) technical files provided by the Lead Agency, discrepancies were identified in the representation of emissions modeling data. Specifically, the timestamps associated with each analysis year do not correspond to the projected conditions for those years. For example, the timestamps reference 2017 data for the 2036 analysis year.[24] Given that the Draft EIS/EIR identifies 2019 as the baseline year, the use of 2017 timestamps to conduct a future-year analysis is problematic, as it does not accurately reflect the intended projections. South Coast AQMD staff requested clarification from the consultants responsible for preparing the OGV analysis, and the consultants explained that the modeled activity levels for both annual and peak-day scenarios are representative of anticipated future throughput but that the timestamp discrepancies are solely due to the use of BERTHA model outputs that retain their original source-year timestamps and were not updated to align with CEQA analysis years. However, the statement will benefit from further justification, especially given that both the number of vessel calls to POLA and the size of an average containership calling POLA have changed significantly over the past decades. For example, vessel calls by containerships decreased from 1,154 in 2017 to 987 in 2019 (and 971 in 2024), whereas the average containership size increased from 8,096 TEUs/call to 9,461 TEUs/call in 2019 (and 10,605 TEUs/call).[25] Therefore, to ensure transparency and technical adequacy, the Lead Agency is recommended to provide a clear explanation in the Final EIS/EIR and revise the modeling documentation and calculations, as necessary, to ensure that all temporal references accurately reflect the applicable analysis years and associated projections.

Use of Outdated AERMET and Meteorological Data in AERMOD Modeling

Appendix A2 (Air Dispersion Modeling) of the Draft EIS/EIR indicates that AERMOD version 24142 and Wilmington Community station meteorological data processed from the 2012 to 2016

[24] Technical File provided by the Lead Agency, labeled as B121-131_Project_OGVs_2036_peakday_v1
[25] The Port of Los Angeles. Annual Inventory of Air Emissions available at https://portoflosangeles.org/environment/air-quality/air-emissions-inventory

period were used for the health risk assessment (HRA) modeling.[26] However, the Draft EIS/EIR identifies calendar year 2019 as the CEQA baseline year for the Proposed Project. South Coast AQMD released a newer, approved version of AERMOD-ready MET data files (Version 11) in October 2024.[27] The updated dataset was developed using the U.S. EPA's AERMET processor Version 22112, along with pre-processors AERMINUTE Version 15272 and AERSURFACE Version 20060.[28] The U.S. EPA's current preferred and recommended meteorological data preprocessor for the AERMOD, as of the latest release, is AERMET version 24142, released in November 2024.[29]

The use of outdated meteorological data and model versions for the analysis contained in the Draft EIS/EIR is inconsistent with the U.S. EPA Guidelines on Air Quality Models (40 CFR Part 51, Appendix W)[30] and may have resulted in inaccurate or underestimated health risk estimates. To ensure accuracy and consistency with federal modeling guidelines, the Lead Agency is recommended to re-run the air dispersion modeling using the more recent meteorological data processed by the most recent U.S. EPA-recommended versions of AERMET (version 24142), revise the health risk results accordingly, and include the updated results in the Final EIS/EIR.

Alternative 2 Conclusion of Less Than Significant After Mitigation is Inconsistent with the Quantified Emissions from the Off-site Ambient Air Quality Analysis

Chapter 2 (Project Description) of the Draft EIS/EIR identifies the project alternatives that were evaluated as follows: 1) Alternative 1 - No Project is required by CEQA; and 2) Alternative 2 - No Federal Action is required by NEPA.[31]

Section 3.2 (Air Quality and Meteorology) of the Draft EIS/EIR presents the analysis of the off-site ambient air pollutant concentrations and concludes that the impacts would be less than significant after mitigation measures are applied.[32] However, this conclusion is inconsistent with the results presented in Table 3.2-42, which indicate that the mitigated PM10 concentrations exceed the applicable South Coast AQMD air quality significance thresholds in 2036.[33] Thus, this inconsistency between the quantitative results and the conclusion undermines the accuracy of the analysis and the significance determination. Therefore, the Lead Agency is recommended to revisit the analysis and perform a quality assurance/quality control check and update the analysis and conclusion accordingly to ensure that the significance determination accurately correlates to the results presented in Table 3.2-42 (and vice versa) and is supported by the evidence in the underlying modeling outputs and technical files.

[26] Appendix A2. p. A2-11.
[27] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html
[28] South Coast AQMD Data for AERMOD available at https://www.aqmd.gov/home/air-quality/meteorological-data/data-foraermod
[29] U.S. EPA Air Quality Dispersion Modeling - Preferred and Recommended Models available at https://www.epa.gov/scram/meteorological-processors-and-accessory-programs
[30] Code of Federal Regulations. Title 40. Part 51. Appendix W available at https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-51/appendix-Appendix%20W%20to%20Part%2051
[31] Draft EIS/EIR. p. 2-22.
[32] *Ibid*. p. 3.2-140.
[33] *Ibid*. p. 3-2.139.

Recommended Additional Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, the following mitigation measures and project design considerations are recommended to be incorporated into the Final EIS/EIR in addition to the 10 mitigation measures and two lease measures currently proposed in the Draft EIS/EIR.

Fugitive Dust Control

The Lead Agency is recommended to implement enhanced fugitive dust controls during all earth-moving activities during construction beyond what is required in South Coast AQMD Rule 403. Key elements of the dust control plan include increased watering of active areas; stabilization of inactive disturbed surfaces; installation of wind fencing; covering of haul trucks; wheel washing at site access points; suspension of work during high wind conditions or visible dust events; use of certified street sweepers; reduced vehicle speeds on unpaved roads; and traffic management strategies to minimize dust generation.

Alternative Maritime Power

Although the construction of the new wharf would be equipped with new Alternative Maritime Power (AMP) infrastructure, the Lead Agency is recommended to include the implementation of 100% AMP infrastructure at the new wharf to minimize emissions from docked vessels. All AMP-capable vessels visiting Berths 121–131 connect to shore power during hoteling, where feasible, in place of auxiliary engine use. This measure supports the reduction of criteria pollutants and greenhouse gas emissions, contributing to regional air quality objectives and consistency with applicable regulations. Implementation includes coordination with terminal operators and vessel operators, along with monitoring and recordkeeping procedures to document AMP usage and address any operational constraints. This mitigation measure requires 100% AMP with the following exceptions: 1) under safety and emergency events; 2) vessel commissioning; and 3) vessel-side or terminal-side equipment failure.

Cargo Handling Equipment

The 2017 San Pedro Bay Ports Clean Air Action Plan (CAAP),[34] the June 2017 joint declaration between the Mayors of Long Beach and Los Angeles, and Mayor Karen Bass's 2026 Climate Action Plan for Los Angeles,[35] set or reaffirm the goal of 100% zero emission (ZE) for ALL cargo handling equipment (CHE) by 2030. However, instead of having year 2030 as the deadline for transition to ZE CHE, the lease measure LM AQ-1 states that such transition at the proposed redeveloped terminal will only begin in 2030. Mitigation measures MM AQ-9 and MM AQ-10 in the Draft EIS/EIR do require 100% conversion to ZE, but the deadline is 2035 and only for a subset of CHE, including yard tractors, forklifts, and top picks. Therefore, the Lead Agency is

[34] San Pedro Bay Ports Clean Air Action Plan 2017 available at https://portoflosangeles.org/environment/air-quality/san-pedro-bay-ports-clean-air-action-plan

[35] Mayor Bass' Climate Action Plan for Los Angeles available at https://plan.mayor.lacity.gov/sites/g/files/wph2541/files/2026-04/MayorBassClimateActionPlanforLosAngeles_2026_1.pdf

recommended to re-evaluate the related mitigation measures to require zero-emission CHE based on the Ports' own CAAP goal, the Ports' latest CHE Technical Assessment, as well as successfully demonstrated ZE CHE through the Ports' Technology Advancement Program[36] or other demonstration projects.

Harbor Craft

While mitigation measure MM AQ-1 in the Draft EIS/EIR indicates that tugboats utilized during construction must meet, at a minimum, Tier 3 engine standards or newer technologies, the Lead Agency is recommended to strengthen this requirement. Specifically, Lead Agency is recommended to require the use of the cleanest available harbor craft in alignment with the CARB Commercial Harbor Craft (CHC) - the 2022 Amendment to the CHC Regulation.[37] Consistent with CARB's more stringent emissions control requirements, implementation of advanced engine upgrades or zero-emission technologies, where feasible, would further reduce emissions of criteria pollutants. Thus, all tugboats used during construction are recommended to be equipped with the most advanced and cleanest technologies available to minimize regional and localized air quality impacts.

Switch Locomotives

The Lead Agency is recommended to include the use of cleaner yard locomotives (also known as "switchers" or "switch locomotives") to reduce diesel particulate matter (DPM) and criteria pollutant emissions associated with cargo handling at Berths 121–131. The current on-port switcher operator, Pacific Harbor Line (PHL), voluntarily uses renewable diesel for its locomotive fleet,[38] and the third amendment to the PHL lease agreement requires the use of Tier 3 or cleaner locomotives. Furthermore, in the port staff discussion accompanying the proposed 2010 Los Angeles Board of Harbor Commissioners Resolution approving the third lease amendment, it additionally referenced the requirements for newly acquired switch locomotives after January 1, 2015 to meet Tier 4 standards, and for all other switch locomotives to meet Tier 4 emission levels for PM in addition to meeting Tier 3 emission levels for NOx.[39] Ports of Long Beach and Los Angeles are currently evaluating proposals to select the next on-port switcher operator. The Ports' joint Request for Proposals – Port Rail Operator requires proposers to collaborate with the Ports on the development of a zero-emission operations and infrastructure master plan (ZE Master Plan). Proposers that include a Zero Emission Plan with a time-specific schedule for deployment of zero-emission locomotives are considered more favorably.

Considering the existing lease requirements and business practice as summarized above and to support the Ports' emphasis on transitioning to ZE technologies, the Lead Agency, together with its neighboring Port of Long Beach, is recommended to require the selected operator to use Tier 4 or cleaner locomotives with renewable diesel until ZE locomotives are deployed. If a Zero Emission Plan for ZE locomotives deployment is not provided, the Lead Agency is recommended to collaborate with the selected operator on a plan for ZE switch locomotives deployment, to optimize infrastructure implemented according to the ZE Master Plan and in a consistent manner

[36] Port's Technology Advancement Program available at https://cleanairactionplan.org/technology-advancement-program
[37] CARB's Commercial Harbor Craft available at https://ww2.arb.ca.gov/our-work/programs/commercial-harbor-craft
[38] Port of Los Angeles Inventory of Air Emissions 2024, available at: https://kentico.portoflosangeles.org/getmedia/d9720ae3-fd18-4b0e-9d32-380df2e475db/2024-air-emissions-inventory
[39] See: https://cityclerk.lacity.org/onlinedocs/2010/10-0673_rpt_bhc_4-20-10.pdf

with the upcoming Phase 2 Port Zero-Emission Infrastructure Plan as required by the Cooperative Agreement between South Coast AQMD and the Ports of Long Beach and Los Angeles (hereafter "Cooperative Agreement") that is due by the end of 2028. This measure supports improved local air quality and aligns with regional and state air quality goals, with implementation coordinated through terminal operators and documented through equipment tracking and reporting procedures.

Ocean-going Vessels

The Lead Agency is recommended to include a mitigation measure on OGV to bring cleaner ships to the Port, similar to the mitigation measure (MM AQ-11: Cleaner OGV Engines) included in the Lead Agency's Final EIR/EIS for Berths 302-306,[40] and establish a clear reporting mechanism to demonstrate the implementation and effectiveness of this recommended measure. In the 2006 CAAP, Ports included measure San Pedro Bay Ports SPBP-OGV5, which seeks to maximize early or preferential deployment of cleaner or newer engine vessels meeting new International Maritime Organization (IMO) NOx standards to the San Pedro Bay Ports. This measure was later supplemented by the 2017 CAAP's Clean Ship Program strategy intended to encourage cleaner ships and discourage older ships calling the ports. To support the Ports' own CAAP, the Lead Agency is recommended to include a measure that encourages OGVs calling at Berths 121-131 to meet the IMO NOx emission limit of 3.4 grams per kilowatt-hour (g/kW-hr), as well as to work with the terminal tenant's ocean carrier clients, potentially including carrier(s) sharing the same parent/holding company as the terminal tenant, to confer with the ship designer and engine manufacturer to determine the feasibility of incorporating all emission reduction technology and/or design options when ordering new ships bound for the Port of Los Angeles.

Trucks

The Lead Agency is recommended to, at a minimum, implement its own Port of Los Angeles Clean Truck Program,[41] which has the goal of transitioning to a ZE drayage truck fleet by 2035 as established in the 2017 CAAP. Per the Port's Clean Truck Program, trucks entering the Port must be model year 2014 or newer. The Lead Agency is recommended to further incorporate a phase-in schedule in its Clean Truck Program to increase the use of cleaner or ZE trucks and complete the phase-in in a consistent manner with its own 2017 CAAP goal, to reduce any significant adverse air quality impacts. South Coast AQMD staff are available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

The Lead Agency is recommended to include environmental analyses in the Energy and Utilities and Service Systems sections of the Final EIS/EIR, as appropriate, to evaluate and identify sufficient electricity supply and supporting infrastructure necessary to accommodate ZE truck operations. Adequate electrical infrastructure is directly related to the feasibility and effectiveness of ZE truck implementation, which is a key mitigation strategy relied upon to reduce criteria pollutant emissions, toxic air contaminants, and greenhouse gas emissions associated with truck activities. This analysis should include the provision of electric vehicle (EV) charging stations, or

[40] Berths 302-206 APL Container Terminal Project. Revised mitigation Monitoring and Reporting Program available at https://kentico.portoflosangeles.org/getmedia/c81a52b7-7258-4862-81a7-4b510846a5d3/APL-FEIR-ADDENDUM-MMRP-FINAL-10-17-2016

[41] Port of Los Angeles Clean Truck Program available at: https://portoflosangeles.org/environment/air-quality/clean-truck-program.

at a minimum, the installation of adequate electrical infrastructure with appropriately sized electrical panels. Electrical hookups should also be provided to allow trucks to power onboard auxiliary equipment while parked to avoid diesel truck idling and associated localized air quality and health risk impacts.

In addition, per the Cooperative Agreement with the Ports of Long Beach and Los Angeles (more information in the subsequent comment of this letter), the ZE infrastructure plans will be developed in three phases, with the Phase 1 Plans for infrastructure for container terminal CHE and drayage trucks that are due by the end of 2027.

The Lead Agency is recommended to: 1) include the requirement in applicable bid documents, purchase orders, and contracts; 2) require operators to maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection; and 3) conduct regular inspections to the maximum extent feasible to ensure compliance.

Additionally, if higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

MM GHG-2: GHG Reduction Offsets

Section 3.6 (Greenhouse Gas Emissions) of the Draft EIS/EIR indicates that the greenhouse gas (GHG) emissions are associated with container ships, cargo handling equipment, tugboats, locomotives, and drayage trucks as among the major sources.[42] However, the Draft EIS/EIR only proposes MM GHG-1 (LED Lighting) as an onsite mitigation, and fails to consider or analyze any additional onsite direct mitigation of GHG, and proposes only an offset-based mitigation measure, MM GHG-2 (GHG Reduction Offsets). The Lead Agency is recommended to give preference to direct onsite mitigation for GHG and require offsets only after the conclusion that additional significant GHG emissions cannot be mitigated through onsite measures.

The Lead Agency is recommended to evaluate options to obtain onsite GHG mitigations through the mitigation of drayage truck emissions. For example, the Port could evaluate incentive measures to advance its own CAAP goals to increase ZE drayage trucks. The Lead Agency should evaluate expanding this program to include priority scheduling and reserved time slots for ZE trucks.

The Lead Agency is recommended to evaluate options to mitigate GHG emissions through further CHE mitigation. The 2017 update to the San Pedro Bay Ports CAAP[43] incorporated commitments from the Mayors of Los Angeles and Long Beach to achieve ZE CHE by 2030.[44] Consistent with that commitment, the Lead Agency is recommended to evaluate a phase-in schedule to achieve ZE equipment at the Terminal by 2030.

[42] Draft EIS/EIS. p. 3.6-14.
[43] San Pedro Bay Ports Clean Air Action Plan 2017 available at https://portoflosangeles.org/environment/air-quality/san-pedro-bay-ports-clean-air-action-plan
[44] Draft EIS/EIS. p. 3.2-24.

Lead Agency's current mitigation measures do not continue any further phase-in of cleaner equipment, but the Proposed Project continues until 2062. If the Lead Agency determines that the 2017 CAAP goal of ZE CHE by 2030 cannot be met, then at a minimum, the Lead Agency could obtain GHG reductions by requiring the future phase-in of ZE CHE for equipment of later model years. Doing so would not only mitigate GHGs but would also allow the Draft EIS/EIR to attain the Lead Agency's own CAAP goal as soon as practicable.

South Coast AQMD Air Quality Management Plans, the Cooperative Agreement with the Ports of Long Beach and Los Angeles, and Assembly Bill 617 Community Emissions Reduction Plan

The Lead Agency is recommended to acknowledge the 2016 and 2022 AQMPs[45] as the regional frameworks for the attainment and maintenance of air quality standards, as part of its evaluation of the Proposed Project, in accordance with CEQA Appendix G (Environmental Checklist Form, Section III, part a). These AQMPs provide a comprehensive technical foundation, including emissions inventories, meteorological characterization, regional air quality modeling, growth projections, and the evaluation of control measures.

Additionally, the Lead Agency is recommended to review and incorporate the following information into the Final EIS/EIR, along with the 2016 and 2022 AQMPs:

- Cooperative Agreement Among the South Coast Air Quality Management District, the City of Long Beach Harbor Department, and the City of Los Angeles Harbor Department (effective December 2025). This agreement requires ZE and clean technology infrastructure planning and implementation for mobile emission sources at Ports. Ports should consider all project plans required by this agreement to ensure the Proposed Project is consistent with commitments of the agreement and all resulting infrastructure. Supporting documentation is available at: https://www.aqmd.gov/portsagreement.

- The measures and implementation actions identified in Chapter 5 of the Wilmington, Carson, West Long Beach (WCWLB) Community Emissions Reduction Plan (CERP),[46] and assess the Proposed Project for consistency with applicable CERP objectives and control strategies. Additional details regarding the WCWLB CERP are provided in the subsequent comment of this letter.

  Consistency with the Wilmington, Carson, West Long Beach Community Emissions Reduction Plan Port-related Objectives

The Proposed Project area is located within the Assembly Bill 617 (AB 617) WCWLB community, which is heavily impacted by emissions from multiple sources, including ports, refineries, the oil and gas industry, heavy-duty diesel trucks, warehouses, and rail operations. As part of the AB 617 process, South Coast AQMD worked with a Community Steering Committee (CSC) to develop a

[45] South Coast AQMD Air Quality Management Plans are available at: https://www.aqmd.gov/home/air-quality/air-quality-management-plans

[46] South Coast AQMD, AB617 Wilmington, Carson, West Long Beach Community Emission Reduction Plan available at: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf

CERP, which identifies community air quality priorities and objectives to reduce emissions. The South Coast AQMD Governing Board adopted the WCWLB CERP on September 6, 2019.

The Lead Agency is recommended to review the measures and objectives in Chapter 5 of the WCWLB CERP and evaluate the Proposed Project for consistency with the CERP's port- and goods movement–related objectives, including objectives to reduce emissions from ocean-going vessels, cargo handling equipment, harbor craft, drayage trucks, and rail operations, as well as measures aimed at reducing exposure in adjacent residential communities. Specifically, as CERP objective WCWLB-5c-03 includes measures for ZE equipment and drayage trucks, the Lead Agency is recommended to incorporate an accelerated adoption schedule of ZE equipment and trucks beyond what is currently identified in MM AQ-9 and MM AQ-10.

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, concrete batch plants, etc., air permits from South Coast AQMD will be required. The Final EIS/EIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[47] Rule 203 – Permit to Operate,[48] Rule 401 – Visible Emissions,[49] Rule 402 – Nuisance,[50] Rule 403 – Fugitive Dust,[51] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[52] Rule 1113 – Architectural Coatings,[53] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[54] etc.

It is important to note that if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process

[47] South Coast AQMD, Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[48] South Coast AQMD, Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[49] South Coast AQMD, Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[50] South Coast AQMD, Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[51] South Coast AQMD, Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[52] South Coast AQMD, Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[53] South Coast AQMD, Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[54] South Coast AQMD, Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final EIS/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 EIS/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 are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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