



South Coast Air Quality Management District

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E-MAILED: JANUARY 5, 2011

January 5, 2011

Mr. Dave Mathewson, Director
Planning and Economic Development
Port of Los Angeles
P.O. Box 151
San Pedro, CA 90733

Notice of Exemption for the Replacement of Three Cranes at the Evergreen Terminal (Berths 226-231)

AQMD staff appreciates the opportunity to comment on the proposed project. As described in the December 22, 2010 Board Report, the proposed project will entail removing three smaller container cranes at the Evergreen Terminal, and replace them with three larger cranes with longer outreach and lift height. Thus, the new cranes will have substantially the same purpose however are larger in capacity. Unlike the older cranes to be replaced, the newer cranes will be able to offload larger 8,000 TEU vessels.

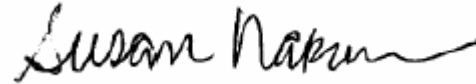
The AQMD staff is concerned that the Board Report lacks sufficient information to conclude that potential air quality impacts are less than significant. There are three areas of concern that the AQMD staff would like to highlight. First, the Board Report does not address construction emissions, including transport of the three new cranes to the Evergreen terminal. Based on the Board Report it appears that these cranes will be transported overseas from Shanghai. Secondly, the Board Report states that there will be no increase vessel calls per year, however the report implies that there is a potential for larger vessels to be calling more frequently. This is based on the Board Report that states, "Provisioning the Evergreen terminal with a total of five ZPMC cranes will allow the size of these vessels (8,000 TEU) to call more frequently..." Lastly, additional information is needed to better understand the existing capacity of the backlands to ensure that there is no increase in capacity from using the larger cranes.

As you are aware, the Port of Los Angeles Staff has been working cooperatively with the AQMD staff to provide additional information to better address these concerns. It is our understanding that the Port of Los Angeles Staff has prepared responses for the Los Angeles Board of Harbor Commissioners Meeting on January 6, 2011 to address our comments.

AQMD staff encourages the lead agency to provide additional documentation in the future to provide the public with enough information to evaluate the potential impacts

from these kinds of activities. AQMD staff looks forward to continuing to work with the Port of Los Angeles to address air quality issues as they arise. If you have any questions regarding these comments or other air quality concerns, don't hesitate to contact me at (909) 396-3105.

Sincerely,

A handwritten signature in cursive script that reads "Susan Nakamura". The signature is written in black ink and has a fluid, connected style.

Susan Nakamura
Planning Manager
South Coast Air Quality Management District

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Control Number