



# South Coast Air Quality Management District

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E-Mailed: August 24, 2012  
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August 24, 2012

Chris Cannon  
Director of Environmental Management  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, CA 90731

Dear Mr. Cannon:

## **Review of the Notice of Preparation of a Program Environmental Impact Report for the Port of Los Angeles Master Plan Update**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Program Environmental Impact Report (EIR) for the Port of Los Angeles Master Plan (PMP) Update. The following comments are meant as guidance for the lead agency and should be incorporated into the Draft EIR as appropriate. AQMD staff looks forward to continuing to work with the lead agency to minimize air quality impacts from port operations wherever feasible.

The PMP Update project proposes to consolidate and update the existing PMP, eliminate or minimize land use conflicts, increase waterfront accessibility, and increase land use efficiency. As you are aware, emissions from the Port of Los Angeles are substantial and impact air quality both locally and regionally. While the detailed air quality analysis for the PMP Update has been deferred to the Draft Program EIR, AQMD staff requests that the attached comments be considered in addition to standard air quality analysis calculations and methodologies.

Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead upon its completion. In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays

in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, evaluated, and minimized. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

**Competitive Advantage**

In the recently certified APL project Final EIR, the lead agency explained that many proposed additional mitigation measures addressing air quality were not feasible because it would put the operator at a competitive disadvantage if these measures were only applied to one project. Because the PMP Update will encompass the entire Port of LA complex, consideration should be made to incorporate enforceable air quality mitigation measures that would apply to the entire port complex. These could include but not be limited to measures to reduce emissions from vessels, locomotives, cargo handling equipment, and trucks. By making uniform policies at the PMP level, competitive advantages or disadvantages can be minimized while also reducing air quality impacts even further.

**Mitigation Measures**

Because the PMP Update is designed to address port growth and operations over the long term, AQMD staff recommends that mitigation measures be considered that may become available within the life of the plan. For example, many zero and near-zero emission technologies are forecast to become available over the next several years but likely after approval of the PMP Update. The PMP Update and Program EIR should include a commitment to review *and implement* these technologies as they come online. Other measures should include reviewing and updating tier 2 and 3 ocean going vessel incentives.

**Alternatives Screening Analysis**

Page 19 of the NOP states that the Los Angeles Harbor Department (LAHD) will undertake a screening process to determine which alternatives to evaluate in detail in the Draft EIR. AQMD staff requests that we be provided the opportunity to review the detailed alternatives and provide feedback prior to LAHD determining which alternatives to remove or include in the Draft EIR.

**Consistency with the AQMP**

Pages 27 and 28 of the NOP state that the PMP Update will have a less than significant impact on implementation of our Air Quality Management Plan (AQMP). Because of the substantial emissions from Port of LA operations, and many of the 'black box' emission reductions needed to achieve the AQMP goals may need to at least partially come from port emission sources, AQMD staff recommends that the lead agency defer a determination of significance on this impact until a more thorough analysis is presented in the Draft EIR.

**Air Quality Analysis Methods**

Pages 28 and 29 of the NOP state that the Program EIR will identify and evaluate standard mitigation measures and potential significance thresholds that will be considered for future site-specific reviews. There have been some disagreements in the past between our agency staff and lead agency staff about specific methodologies used to determine air quality impacts. For example, AQMD staff recommends that the impacts of site-specific projects be separated from the impacts of previously adopted emission standards. AQMD staff recommends that methodology comments from our previous EIR comment letters be reviewed when making determinations in the Program EIR. Further, we look forward to continuing to discuss these methodologies with lead agency staff to resolve any remaining concerns.