



South Coast Air Quality Management District

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July 7, 2021

SENT VIA E-MAIL:

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Christopher Cannon, Director
City of Los Angeles Harbor Department
Environmental Management Division
425 S. Palos Verdes Street
San Pedro, CA 90731

RE: Request for Extension of the CEQA Public Review and Comment Period on the Revised Draft Environmental Impact Report (EIR) for the Southern California International Gateway (SCIG) Project (SCH No.: 2005091116)

Dear Mr. Cannon,

South Coast Air Quality Management District (South Coast AQMD) staff appreciates that the Los Angeles Harbor Department (LAHD) extended the CEQA public comment period on the Revised Draft EIR for the SCIG project to July 30, 2021. Due to the delay in transmitting technical air quality data and emissions calculation files for the SCIG project, South Coast AQMD staff requests the comment period be further extended to August 23, 2021. South Coast AQMD staff is aware that the City of Long Beach and the Natural Resources Defense Council, East Yard Communities for Environmental Justice, and Century Villages at Cabrillo have submitted similar requests.

South Coast AQMD staff has a long history of providing written and oral comments on the SCIG project and was a critical party in the prior litigation involving the initial EIR. (*See City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5th 465.) We maintain our original concerns about the project's significant air quality and health impacts and the need for mitigation measures to reduce these impacts and the resulting health risks to the communities surrounding SCIG.

When the Revised Draft EIR was released for public review on Friday, May 19, 2021, the technical air quality data and emissions calculation files were not included. As the LAHD is undoubtedly aware, without the files, South Coast AQMD staff was unable to properly review the air quality impact analysis in the Revised Draft EIR. On June 11, 2021, which was 23 days after the release

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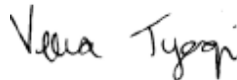
of the Revised Draft EIR, the LAHD provided the files. Due to the delays in transmitting files, South Coast AQMD staff requests that the LAHD extend the CEQA public review and comment period on the Revised Draft EIR from July 30, 2021 to August 23, 2021, which equates to 24 days after June 11, 2021 to account for the lost review time. You may recall that the trial court in the prior litigation advised LAHD that data supporting this Revised DEIR should be provided to the South Coast AQMD in a timely manner to allow the agency with greatest expertise to properly review the air quality analysis.

The air quality and emissions calculation files for the Revised Draft EIR are substantial in size and are complex. As explained in the June 11, 2021 letter prepared by Natural Resources Defense Council, East Yard Communities for Environmental Justice, and Century Villages at Cabrillo, the Revised Draft EIR contains large amounts of technical air quality data for the community members to review and analyze. The files that were provided to South Coast AQMD staff included 30 gigabytes of data, which is comprised of 18 spreadsheets with mass emission compilations, adjusted emission rates, and processed concentrations, over 11,000 AERMOD output files, 288 excel output files with scaled results, and five python scripts. Review of the air dispersion modeling results for the Revised Draft EIR requires specific technical skills and highly trained professionals. The delay in transmitting the data files significantly truncated the review period and the ability to conduct a full review of the air quality analysis.

The South Coast AQMD has expertise in air quality and air quality related health impacts, and the public is relying on the South Coast AQMD's expertise in reviewing the Revised Draft EIR for the SCIG project. As explained in the June 23, 2021 letter prepared by the City of Long Beach, Office of the City Attorney, the community views the South Coast AQMD as the regional agency with technical air quality expertise and sees the South Coast AQMD's role in review of the SCIG project's air quality impacts as a critical component of the public review process. The delayed receipt of the data files, coupled with the South Coast AQMD's technical expertise and unique role as an air agency whose mission is to protect public health, necessitates the need to extend the CEQA public review and comment period for the Project to allow for a thorough review.

For these reasons, we respectfully request that the public review and comment period be extended to August 23, 2021. The South Coast AQMD will be submitting formal written comments on the Revised Draft EIR.

Sincerely,



Veera Tyagi
Principal Deputy District Counsel
Office of the General Counsel

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