



South Coast Air Quality Management District  
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**E-MAILED: August 29, 2008**

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U.S. Army Corps of Engineers, Los Angeles District  
Environmental Resources Branch  
c/o Megan Wong  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Dr. Ralph G. Appy, Director of Environmental Management  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, CA 90731

Dear Ms. Wong and Dr. Appy:

**Draft Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (DSEIS/SEIR) for the Port of Los Angeles Channel Deepening Project**

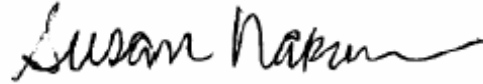
The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The proposed project documents several long-term beneficial effects within the Port. However, the proposed project's air quality impacts after mitigation remains significant on the surrounding harbor area communities.

As required by CEQA Guidelines §15126.4 the lead agencies must include in the SEIS/SEIR all feasible measures to avoid or substantially reduce the project's impacts below significance. The SCAQMD staff has identified additional means to feasibly strengthen mitigation measures for the proposed project in Attachment I. Examples include requiring construction equipment to meet Tier 3 NOx emission standards equipped with Level 2 or 3 CARB verified diesel emission control technology, construction on-road trucks to meet 2007 NOx emission standards, and harbor craft to meet U.S. EPA Tier 3 or cleaner marine engine emission standards.

We understand the Ports are proceeding to develop the San Pedro Bay Standards. In the absence of the San Pedro Bay Standards, the SCAQMD staff urges the Lead Agencies to compare residual emissions from this proposed project, including cumulative emissions from all other foreseeable port actions, with the 2007 Air Quality Management Plan (AQMP) mass emission targets for the ports, and ensure project approval is consistent with achieving those targets.

The SCAQMD staff appreciates the opportunity to comment on this important project. We look forward to working with the Port of Los Angeles on this and future projects. If you have any questions, please call Edward Kim at (909) 396-2323.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura". The signature is written in a cursive style with a long horizontal flourish at the end.

Susan Nakamura  
Planning Manager

Attachment

LAC080711-01EK  
Control Number

## **Attachment I**

### **Additional Comments on the DSEIS/SEIR for the Port of Los Angeles Channel Deepening Project**

The following includes more detailed and specific comments on the Proposed Port of Los Angeles Channel Deepening Project.

#### ***Mitigation Measures***

##### ***MM AQ-2.1: Fleet Modernization for Construction Equipment***

MM AQ-2.1 requires all off-road diesel powered construction equipment greater than 50 horsepower to meet Tier 2 non-road emission standards with CARB certified Best Available Control Technology that will achieve Level 2 or 3 emissions reductions. SCAQMD staff is concerned that Tier 2 non-road emission standards are not the cleanest available construction equipment. SCAQMD staff recommends, all construction equipment be required to meet the cleanest off-road diesel emission level available, but at a minimum equipment meeting the Tier 3 NOx emission standards, and be equipped with Level 2 or 3 CARB verified diesel emission control technology. It is also recommended that these requirements apply during circumstances where a piece of compliant equipment is on order and becomes available during the time frame of construction.

##### ***MM AQ-2.2: Fleet Modernization for On-road Trucks***

MM AQ-2.2 requires all on-road heavy-duty trucks to comply with USEPA 2004 on-road emission standards for PM10 and NOx with CARB certified Best Available Control Technology that will achieve Level 3 diesel emission reductions. SCAQMD staff urges the lead agencies to require as part of this mitigation measure, use of trucks that operate on engines with the lowest certified NOx emissions levels, but must meet at a minimum the 2007 NOx emission standards. It is also recommended that these requirements apply during circumstances where a piece of compliant equipment is on order and becomes available during the time frame of construction.

##### ***MM AQ-2.3: Electrify Dredge Equipment***

MM AQ-2.3 requires all dredging equipment be electric where available. SCAQMD staff has observed that this mitigation measure is inconsistent with the commitment made in the Port of Los Angeles Construction Guidelines adopted by the Board of Harbor Commissioners in February 2008. SCAQMD staff recommends the lead agencies require all dredging equipment for the proposed project to be electric and operate on the electrical grid including all auxiliary equipment.

##### ***MM AQ-2.4: Harbor Craft Used in Construction***

MM AQ-2.4 requires harbor craft used during construction to meet U.S. EPA Tier 2 marine engine emission standards that is either category 1 or 2 marine engine. This mitigation measure does not rely on the cleanest feasible technologies. The SCAQMD staff believes that this measure should require all harbor craft used during the construction phase of the project to re-power to meet the cleanest existing marine engine emission standards or the proposed U.S. EPA Tier 3 (which are proposed to be phased-in beginning 2009) or cleaner marine engine emission standards. In addition, to the extent that harbor craft powered by engines that meet the proposed U.S. EPA Tier 4 marine engine standards are available, these harbor craft should be used.

*MM AQ-2.5: Fugitive Dust Control*

MM AQ-2.5 requires the construction contractor to comply with SCAQMD Rule 403 by reducing fugitive dust emissions to 90 percent from uncontrolled levels. Based on control efficiencies from the Western Regional Air Partnership (WRAP) Fugitive Dust Handbook (September 2006), the more conservative control efficiency of 61 percent to estimate mitigated fugitive dust impacts from soil disturbance is a typical assumption. However, if 90 percent control efficiency is achievable by the lead agencies, the Final SEIS/SEIR should specify those measures and quantify the effects of the control measures to demonstrate the control efficiencies of those measures.

In addition, SCAQMD staff recommends the following additions to MM AQ-2.5:

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
- Sweep all street at least once a day using SCAQMD Rule 1186, 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent street (recommend water sweepers with reclaimed water);
- Apply water three times daily, or non-toxic soil stabilizer according to manufacturers' specification, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders; and
- Apply water three times daily or as needed to areas where soil is disturbed.

*MM AQ-2.6: Additional Best Management Practices (BMPs)*

MM AQ-2.6 requires the use four BMP measures on construction equipment, such as diesel oxidation catalysts and diesel particulate traps; maintaining equipment to manufacturers' specifications; restricting idling to a maximum of 5 minutes when not in use; and installing high-pressure fuel injectors. SCAQMD staff recommends that the lead agencies consider adding the following additional BMP measures to further reduce construction air quality impacts from the project, if applicable and feasible:

- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Provide temporary traffic controls such as flag person, during all phases of construction to maintain smooth traffic flow;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent possible;
- Reroute construction trucks away from congested street or sensitive receptor areas;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Configure construction parking to minimize traffic interference;
- Improve signal flow by traffic synchronization;
- All vehicles and equipment will be properly tuned and maintained according to manufacturer' specifications; and
- If all roads are not paved according to the MM AQ-2.5 SCAQMD staff recommendation, traffic speeds on all unpaved roads to be reduced to 15 mph or less.

***Air Quality Analysis***

*Contaminated Sediments.* Page 2-4 of the DSEIS/SEIR provides a discussion of the contaminated sediments found at the various proposed project related locations in the Port. The lead agencies are reminded that, if soil is contaminated by hydrocarbon materials, contaminated soils would be subject to SCAQMD Rule 1166 – Volatile Organic Emissions from Decontamination of Soil and that compliance should be referenced in the Final SEIS/SEIR.

*Disposal Options.* Page 2-18 of the DSEIS/SEIR lists Anchorage Road Soil Storage Site (ARSSS) as a viable disposal option for contaminated sediments and is part of Alternative 2. The DSEIS/SEIR characterizes ARSSS as an upland soil storage site that has been approved by the Los Angeles Regional Water Quality Control Board (LARWQCB) for disposal of dredge materials that are unsuitable for open water disposal and has been used as a soil storage facility since the early 1990s. SCAQMD staff is concerned that ARSSS is very close in proximity and almost adjacent to the Cerritos Channel and East Basin Marinas, where numerous “live-aboards” reside. SCAQMD staff recommends the lead agencies provide a discussion of possible air quality impacts the contaminated sediments and transportation of the contaminated sediments to the ARSSS may have on the “live-aboard” residents in the Final SEIS/SEIR.

*Peak Daily Emissions.* Page 3.2-30, Table 3.2-10 of the DSEIS/SEIR provides only a footnote description of the peak daily emissions simultaneous activities that would occur. SCAQMD staff recommends the lead agencies provide a detailed construction schedule with corresponding emissions to support the assumptions used in determining the peak daily emissions in the Final SEIS/SEIR. Providing this analysis with the different simultaneous construction scenarios will help to verify peak daily emissions. Furthermore, SCAQMD staff recommends the lead agencies provide all assumptions related to the peak daily emissions calculations in the Final SEIS/SEIR, similar to previous Port EIRs.

*Proposed Project Mitigated Emissions.* SCAQMD staff has noted during the review that the air quality data for the mitigated proposed project (Alternative 1) was missing in Appendix C of the DSEIS/SEIR. Furthermore, the Air Quality and Meteorology section only provides a daily unmitigated emissions table (Table 3.2-10) for the proposed project with unsupported Peak Daily Emissions total at the end of the same table. SCAQMD staff would like to verify the emissions calculations and recommends that the lead agencies provide the missing proposed project air quality data tables for the mitigated proposed project in the Final SEIS/SEIR (Appendix C).

*Health Risk Assessment.* The SCAQMD staff was unable to duplicate the 14.8 tons of DPM emissions for the unmitigated TraPac project using the referenced table (Table D4-PP-22). Similar to the cancer risk discussion, SCAQMD staff was unable to duplicate the 62.2 tons of peak annual unmitigated DPM emissions from the TraPac project using the referenced table (Table H5-A1.27) to determine the DPM emission rate for the chronic non-cancer effects. SCAQMD staff recommends the lead agencies provide a more thorough explanation in the Final SEIS/SEIR of how the 14.8 tons and 62.2 tons were calculated since it is critical in establishing the percent ratio for the cancer risk and chronic non-cancer effects estimation.

The lead agencies compared the peak daily unmitigated emissions for VOC and DPM from the TraPac project to the proposed project in determining the acute non-cancer hazard index on Page

3.2-39. SCAQMD staff requests the lead agencies provide supporting information for using the VOC/DPM emissions from Surcharge Loading at the Southwest Slip (41/16) as the representative peak daily unmitigated activity to compare with the TraPac emissions.

*New Generation of Container Vessels.* Page 2-2 and Page 2-39 states that the proposed project is needed to allow the new generation of deeper draft container ships access to Port terminals along the Main Channel and the existing depth of -45 feet MLLW would result in continued restrictions on use of the new generation of container vessels. The primary purpose of the proposed project according to Page 7-3 is to allow ships transporting cargo into and out of the Port to operate with greater efficiency. SCAQMD staff recommends the lead agencies clarify the size of the “new generation” vessels that would benefit from the proposed dredging project of -53 feet MLLW in the Final SEIS/SEIR. Specifically, the lead agencies should provide the TEU ship size of which the Port’s Main Channel would be able to accommodate (eg. SUEZMAX 12,000 TEU) and if there will be container ship size limitations in the Port Main Channel after the proposed project has been completed (tide level limitations should also be provided) to verify greater efficiency claims in the proposed project.