



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

October 18, 2017

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City of Los Angeles Harbor Department
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Negative Declaration (ND) for the Proposed Reeves Avenue Marine Services Support Yard Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final ND.

SCAQMD Staff's Summary of Project Description and Air Quality Analysis

The Lead Agency proposes to pave and repair the existing marine services support yard and issue a Revocable Permit to operate a 450-slot peel-off yard (POY) on 12 acres to enable marine related services and support activities (Proposed Project). The anticipated build-out year is 2021 because the operational life of the Proposed Project is for a term of five years¹. In the Air Quality analysis, the Lead Agency compared the emissions for year 2021 with POY to those emissions in the same year without POY and used the differences to find that the Proposed Project's operational air quality impacts would be less than significant because PM₁₀, PM_{2.5}, NO_x, SO_x, CO, and VOC emissions would be below SCAQMD's air quality CEQA significance thresholds².

SCAQMD staff seeks clarifications for operational activities that were included in calculating the peak daily regional operational emission for operating year 2021 without POY in Table 4.3-4, *Peak Daily Regional Operational Emissions* in the Air Quality section. Based on a review of Section 2.2.2, *Existing Conditions*, SCAQMD staff understands that the existing container staging operations, since they were temporary, were not considered to be existing ongoing activities and were not included in the baseline³. However, after a review of the ND and the associated Traffic Analysis Technical Memorandum, SCAQMD staff is not able to find the information on the existing going activities that were not included in the baseline but were included in the calculations for operating year 2012 without POY. Therefore, SCAQMD staff was not able to meaningfully review the emission calculations. It is recommended that the Lead Agency provide additional information to clarify operational activities in year 2021 without POY in the Final ND.

¹ ND. Page 2-10 and Page 4-52.

² ND. Table 4.3-4, *Peak Daily Regional Operational Emissions*. Page 4-11.

³ ND. Page 2-9.

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Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the ND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

JW/LS:JC

LAC170922-05

Control Number