



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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

Mitigated Negative Declaration for the Proposed Berths 118 and 119 (Kinder Morgan) Wharf Repair Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final CEQA document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to conduct structural repairs to existing wharf-support structures and construct one new berthing structure at the Kinder Morgan Los Angeles Harbor Terminal, Berths 118 and 119 (proposed project). The proposed project includes mending the wharf deck and wharf-support timber piles and constructing new wharf-support and fender piles. The project is located at the Port of Los Angeles near the southeast corner of John S. Gibson Boulevard and West Harry Bridges Boulevard.

Permits and Compliance with SCAQMD Rules

Upon review of the MND it was not clear to SCAQMD staff whether berthing and structural repair activities will affect the marine bulk load/unloading rack. If piping or pump changes are part of the proposed project, a permit modification will be required to include any new piping connections and/or components and to assess fugitive emissions. SCAQMD should be identified as a responsible agency for the proposed project if permit modifications or additional permits are required. For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 296-3385. The final CEQA document should also demonstrate compliance with SCAQMD Rules, including, but not limited to, Rule 403 – Fugitive Dust, Rule 1113 – Architectural Coatings, and Rule 1168 – Adhesive and Sealant Applications.

Closing

Pursuant to CEQA Guidelines Section 15074, prior to approving the proposed project, the lead agency shall consider the final CEQA document for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the final CEQA document. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the proposed project.

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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Daniel Garcia

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

DG/AM:LD

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