



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:

May 14, 2019

[ceqacomment@portla.org](mailto:ceqacomment@portla.org)

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

## **Negative Declaration (ND) for the Proposed Chassis Depot and Repair Facilities Located at Berths 206-209**

The South Coast Air Quality Management District (South Coast AQMD) 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 ND.

### South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 20,000 square feet of structures and renovate two buildings totaling 93,000 square feet for reuse to perform maintenance, repairs and refurbishment of chassis along with tire storage and maintenance. Construction is expected to take three months<sup>1</sup>.

### South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

Since the Proposed Project would include demolition of structures that were built in 1970, asbestos may be encountered. South Coast AQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with South Coast AQMD Rule 1403<sup>2</sup> in the Air Quality Section of the Final ND.

### Conclusion

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. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final ND. When responding to issues raised in the comments, responses 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, informative, or useful to decision makers and the public who are interested in the Proposed Project. South Coast AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions regarding the enclosed comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC190501-15  
Control Number

---

<sup>1</sup> ND. Page 29.

<sup>2</sup> South Coast AQMD. Rule 1403. Assessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.