



South Coast
Air Quality Management District

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**Final Environmental Impact Statement/Report (Draft EIS/EIR)
for the Proposed Berths 212-224 (YTI) Container Terminal Improvements Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to submit comments on the Final EIS/EIR for the Proposed Berths 212-224 (YTI) Container Terminal Improvements Project. The SCAQMD staff reiterates the concerns raised in our June 27, 2014 comment letter on the Draft EIR/EIS. In particular, the project demonstrates significant air quality and health risk impacts that exceed SCAQMD thresholds and are not consistent with the San Pedro Bay Standards developed as part of the Clean Air Action Plan. In addition, as demonstrated in the project analysis, emissions from terminal operation on its own will exceed federal Ambient Air Quality Standards for NO₂. Besides affecting public health, exceedances of ambient air quality standards can have other repercussions (e.g., economic, regulatory, etc.) to the region due to the federal mandates to address the exceedance. Given these significant air quality and public health impacts, we request that the port reconsider the Final EIR/EIS conclusion that there is no feasible way to commit to Zero/Near-Zero Emissions (ZE/NZE) or other technologies to reduce these impacts.

SCAQMD staff believes that there are several mitigation measures that are available in the life of the project, and today, that can be feasibly implemented to reduce the impacts from project operations. In the next several years these include committing to using ZE/NZE trucks and cargo handling equipment, Tier 4 locomotives, and Tier 3 ocean going vessels. There are no commitments in the Final EIR to actually using any of these technologies.

There are also measures that should be considered today that were not discussed in the Final EIR. First, the port should evaluate the feasibility of using equipment similar to the 72 zero emission cargo handling vehicles purchased by Long Beach Container Terminal for the Port of Long Beach Middle Harbor project.¹ It is our understanding that the decision to purchase these vehicles (that are onsite today) was not required as CEQA mitigation, but rather that these vehicles would be beneficial to the terminal operator. Second, the port should evaluate the ability of the terminal operator to incentivize ZE/NZE trucks. As an example, the terminal operator could provide incentives (e.g., expedited access, reduced fees, etc.) at the gate or in the terminal for ZE/NZE trucks.

We appreciate your willingness to consider these comments, and we look forward to continuing to work with you in developing clean air strategies. If you have any questions, don't hesitate to contact either Susan Nakamura at (909) 396-3105, or myself at (909) 396-3244.

Sincerely,



Ian MacMillan
Program Supervisor
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¹ http://www.terex.com/port-solutions/en/static/UCM03_074576_Latest_1_UCM03_074576_Web.pdf