



# South Coast Air Quality Management District

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## **Recirculated Mitigated Negative Declaration (MND) for the Proposed Star-Kist Cannery Facility Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles Harbor Department is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include information on the Community Emissions Reduction Plan (CERP) for the designated AB 617 Wilmington, Carson, West Long Beach (WCWLB) community in which the Proposed Project is located and recommended use of zero-emissions cargo handling equipment that the Lead Agency should include in the Final MND.

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

Based on the Recirculated MND, the Proposed Project would involve demolition of an existing 2,254-square-foot building for development of a future cargo support facility. Because the future use of the Proposed Project is not known at the time of the release of the Recirculated MND, the environmental analysis in the Recirculated MND assumed the future use of the Proposed Project as a chassis repair and maintenance depot<sup>1</sup>. Assuming chassis are stacked to a maximum of five-chassis high when stored, the Proposed Project can store a total of 5,600 chassis<sup>2</sup>. Yard equipment to support operations would include two 30,000-pound forklifts, two 10,000-pound forklifts, one top pick, one utility tractor rig, and a mobile fuel service truck would provide diesel and propane for on-site equipment<sup>3</sup>. Truck trips from drayage trucks traveling to and from the Proposed Project would be those already existing and traveling to the Harbor District<sup>4</sup>.

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<sup>1</sup> Recirculated MND. Page 2-1.

<sup>2</sup> *Ibid.* Page 2-6.

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid.*

South Coast AQMD Staff's Comments*Community Emissions Reduction Plan for the Designated AB 617 WCWLB Community*

The Proposed Project is located in the designated AB 617 WCWLB community. Through the AB 617 program, the community and South Coast AQMD staff have developed a CERP<sup>5</sup> that identifies air quality priorities and actions to reduce air pollution in the community. The South Coast AQMD's Governing Board adopted the CERP for the designated AB 617 WCWLB community in September 2019. Since the adopted CERP existed at the time of the release of the Recirculated MND in November 2021, the Final MND should include a discussion of the CERP. Additionally, South Coast AQMD staff recommends that the Lead Agency review the actions included in Chapter 5, *Actions to Reduce Air Pollution Emissions or Exposures*, of the adopted CERP to explore whether additional air quality lease measures and mitigation measures can be identified and implemented at the Proposed Project.

*Zero-Emissions Cargo Handling Equipment*

Based on the Recirculated MND, the Lead Agency assumed that the cargo handling equipment for operations at the Proposed Project would involve the use of two propane-fueled 10,000-pound forklifts, two diesel-fueled 30,000-pound forklifts, one top pick, and one utility tractor rig<sup>6</sup>. The Lead Agency did not include a lease measure, project design feature, or mitigation measure for air quality in the Recirculated MND.

Technology is transforming the freight and transportation sectors at a rapid speed. Based on the California Air Resources Board's Advanced Clean Fleet Truck Rulemaking<sup>7</sup>, zero-emissions drayage trucks, cargo handling equipment (including yard tractors) are already technically feasible and commercially available. Therefore, South Coast AQMD staff recommends that the Lead Agency require 100 percent of cargo handling equipment use zero-emissions technologies such as electric cargo handling equipment by the Proposed Project's opening day and include this requirement as a lease measure or a project design feature for future development. This recommendation supports the CERP implementation.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the Final MND 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 MND. 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.

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<sup>5</sup>The WCWLB Community Emissions Reduction Plan is available at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-sep6-025c.pdf>.

<sup>6</sup> Recirculated MND. Page 4-9

<sup>7</sup> CARB. Advanced Clean Fleets. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets>.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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