



South Coast Air Quality Management District
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Via Email and U.S. Mail

February 14, 2012

Chris Cannon
Director of Environmental Management
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731

Dear Mr. Cannon:

Draft Environmental Impact Report
Southern California International Gateway (SCIG) Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Southern California International Gateway (SCIG) Project. The SCAQMD staff appreciates the additional time that the Port of Los Angeles has provided to review modeling files for the Proposed SCIG Project. As you are aware, the SCAQMD staff received the final set of modeling files on January 31, 2012. Due to the delay in transmitting files, the Lead Agency granted the SCAQMD staff two weeks (two weeks after the February 1, 2012 close of comments for the DEIR) to submit comments on the air dispersion modeling files. Air dispersion modeling for the proposed project was extensive and the 42 gigabytes of data provided to AQMD staff included 226 model input files, thousands of model output files, and 46 databases. The two week extension was not a sufficient amount of time to allow for a full review of the modeling files due to the complexity of the air dispersion modeling, the extent of the data, and the lack of documentation.

The SCAQMD staff requested to review the air dispersion modeling data to review the actual calculations and modeling used to support the significance determinations. The data that was sent to our agency was missing key pieces of information such as activity data to verify and/or recreate emissions calculations, pollutant concentrations, and verify air dispersion modeling results. In addition, emission rates could not be verified as emission rates in the modeling files were unitized (e.g., set to 1 gram per second per source) to allow the output files to be easily scaled up or down. It appears that the data that would identify how much the unitized emission factors were scaled up or down was not included in the data sent to the SCAQMD.

Figure 1 below presents a simplified flow chart describing the steps that are followed to convert emission factors into predicted pollutant concentrations using a dispersion model like AERMOD. As can be seen in the figure, critical data was not provided to AQMD staff or to the public. This data is necessary to confirm the validity of the results of the dispersion modeling analysis. A

specific example illustrating how the missing data precludes the ability to validate the results of the analysis is below.

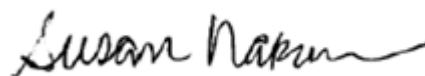
In the 'LHIDLE' (line haul locomotive idling) modeling input file, several point sources are located along the San Pedro Branch line north-northeast of the project site. These sources extend alongside Stephens Middle School and reach the southern end of the Windward Village Mobile Home Park. The 'unitary' emission rates for each of these sources varies from 2 grams per second up to 5 grams per second. The derivation of these emission rates is not presented in the Draft EIR or in the files provided separately to AQMD staff. The calculations that convert the source strength/pollutant concentration ratio to actual predicted concentrations are also not provided. Further, because the activity data (i.e., hours of idling per day) for locomotives idling on this section of the San Pedro Branch line is also not provided, AQMD staff cannot re-create the emission rates used in the modeling files. Without knowing the activity data for all of the thousands of sources in the analysis, it is impossible to determine if the modeled pollutant concentrations correspond to values presented in the Draft EIR.

Although emissions calculations used to conduct to air dispersion modeling could not be completely reviewed, the location of emission sources was available. There appears to be a disconnect between the text of the DEIR and the location of locomotives that were modeled for the proposed project. The DEIR shows (Figure 2) locomotive emissions along the San Pedro Branch Line would occur south of Stephens Middle School. In the modeling files (Figure 3) the locomotive emissions along the San Pedro Branch Line extend well north of Stephens Middle School near the residential community of West Long Beach. If the proposed project will result in locomotives operating on the northern portion of the San Pedro Branch Line, that should be appropriately reflected in the DEIR, such as in Figure 3.

Without the missing data and calculations, AQMD staff cannot verify criteria pollutant modeling and health risk assessment results in the DEIR. This type of data is regularly provided by all other lead agencies in our jurisdiction when requested, and has been provided by the Port of Los Angeles for other projects, including the APL Terminal project currently in its Draft EIR comment period. AQMD staff therefore requests that the full analysis be provided to the public with sufficient time to review prior to the lead agency approving the project.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff appreciates the opportunity to comment on this important project. We look forward to working with the Port of Los Angeles on this and future projects. If you have any questions, please call me at (909) 396-3105.

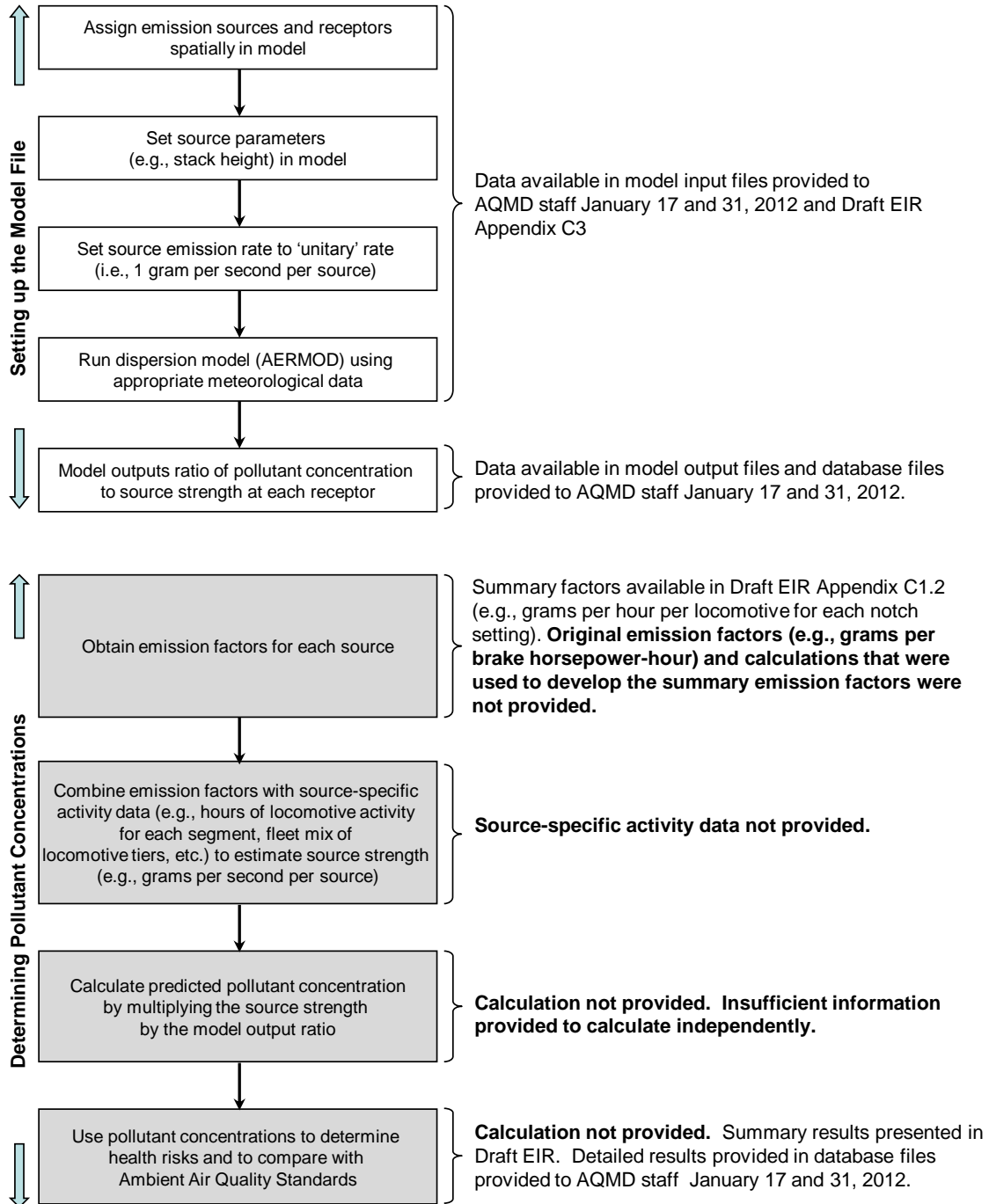
Sincerely,



Susan Nakamura
Planning Manager

Attachments

Figure 1
Simplified Air Quality Dispersion Modeling Process Flowchart



Note: Shading indicates information not provided that is critical to calculating pollutant concentrations

Figure 2
Figure C3.4-2 from DEIR
(Legend Shows Only Switcher Locomotive Idling)



Figure 3

Location of Switcher Locomotives in Modeling Analysis

