



South Coast Air Quality Management District

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FAXED: AUGUST 22, 2008

August 22, 2008

Mr. Spencer D. MacNeil, D.Env and Dr. Ralph G. Appy
Regulatory Division and the Los Angeles Harbor Department
U.S. Army Corps of Engineers, Los Angeles District
ATTN: CESPL-RG-2004-0917-SDM
P.O. Box 532711
Los Angeles, CA 90053-2325

Draft Supplemental Environmental Impact Statement/Report (Draft SEIS/SEIR)
for the Proposed Pacific L.A. Marine Terminal LLC Pier 400, Berth 408 Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff also would like to thank the lead agencies for allowing additional time in which to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Supplemental Environmental Impact Statement/Report.

SCAQMD-1

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 Statement/Report. The SCAQMD staff is willing to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

SCAQMD-2

Sincerely,

Steve Smith
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC080529-02
Control Number

Port of Los Angeles		Date	8/22/08	# of pages	7
Post-it® Fax Note 7671		From	Gordon Mize		
To	Dr. Ralph Appy		Co	SCAQMD-CEQA	
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- SCAQMD-3 1. Under Local Regulations and Agreements in Volume I on page 3.2-23, the lead agencies have included applicable SCAQMD rules and regulations. In the Final EIR, the lead agencies should also cite compliance with the following SCAQMD rules and regulations:
- Rule 431.1 – Sulfur Content of Gaseous Fuels;
 - Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing; and
 - Regulation XVII – Prevention of Significant Deterioration.
- SCAQMD-4 2. On page 3.2-7 under Local Monitoring Levels, the lead agencies state, in part, in Footnote 2 that the SCAB is still considered a nonattainment area for CO until a petition for redesignation is submitted by the State and is approved by USEPA, etc. The lead agencies should note that effective June 11, 2007, the U.S. EPA re-designated the South Coast Air Basin as in attainment of the National Ambient Air Quality Standards (NAAQS) for CO. These references on page 3.2-7 should be revised in the Final SEIS/SEIR to reflect the Basin's current CO attainment status.
- SCAQMD-5 3. SCAQMD staff recommends that Table 3.2-10 on page 3.2-35 be modified under the tank column to include the vapor destruction unit used since this device is expected to be used to control tank emissions.
- SCAQMD-6 4. On page 3.2-33 the lead agencies assume a fugitive dust control efficiency of 75 percent for earth-moving activities based on watering two times per day and use of other best available control measures (BACMs). Watering disturbed sites two times per day generally has a control efficiency of approximately 50 percent. Without specifying the actual BACMs to be used, a control efficiency of 50 percent should be used. Alternatively, the lead agencies should specify the BACMs that will be used to achieve the additional 25 percent reduction in fugitive dust emissions.
- SCAQMD-7 5. On page 2-38 the lead agencies state, "For each construction site, most construction personnel would meet in one of the staging areas and go to the construction site in work trucks and buses. SCAQMD staff was unable to locate emission estimates for construction worker transport trucks or buses. Please include these emissions in the Final SEIS/SEIR. If these emissions are already included, please indicate where they may be found.
- SCAQMD-8 6. When reviewing the construction air quality analysis results in appendix H.1, it was difficult to reconstruct many of the emission totals because assumptions and intermediate steps were not included. For example, unmitigated worker commute trip emissions are shown in Tables H.1 PP.Un.Const-1 and H.1.PP.Un.Const-1a. On page 2-38 the lead agencies state that during the construction period there will be approximately 732 full-time employees. Later in the same paragraph the lead agencies state that the peak construction workforce will be 523 construction workers. It is not clear whether or not the construction worker commute emissions are based on 732 or 523 workers, what the commute trip length is, average vehicle ridership (AVR), etc. SCAQMD staff recommends for the current project and future projects

undergoing a CEQA/NEPA analysis that all assumptions used in the air quality analysis, for both construction and operation, as well as sample equations, be included as part of the CEQA/NEPA document.

↑ SCAQMD-8

7. In the project description on page 2-42, the lead agencies state that heavy-duty trucks or railcars will be used to deliver materials onsite during construction of the marine terminal. Review of the relevant emission tables in Appendix H.1 indicates that the lead agencies included only heavy-duty haul truck emissions in the analysis. Please indicate whether or not this means railcars will not be used to deliver construction materials. Alternatively, please demonstrate that haul truck emissions provide a more conservative analysis of emissions related to construction materials delivery. If this is not the case, or if railcars will be used in addition to trucks, then the construction material delivery analysis should be revised in the Final SEIS/SEIR. The analysis should include the equations, emission factors, methodologies, etc., used to calculate the rail activity emissions.

SCAQMD-9

8. SCAQMD staff had trouble reconciling peak daily phase 1 unmitigated construction emissions in Table 3.2-11 in Chapter 3 and the peak daily phase 1 unmitigated construction emissions in summary Table H.1.PP.Un.Const-1 in Appendix H.1. Peak construction emissions differ substantially between these two tables. Also, it is unclear what emissions sources contribute to the peak daily construction emissions in Table 3.2-11.

SCAQMD-10

SCAQMD staff also had trouble reconciling peak daily mitigated construction emissions in Table 3.2-13 in Chapter 3 and the peak daily mitigated construction emissions in summary Table H.1.PP.Mit.Const-1 in Appendix H.1. Similar discrepancies apply to Phase 2 unmitigated construction and phase 2 mitigated construction emissions.

SCAQMD-11

Finally, comparing peak daily unmitigated phase 1 construction emissions in, for example, Table H.1.PP.Un.Const-1 to peak daily mitigated phase 1 construction emissions in, for example, Table H.1.PP.Mit.Const-1 in Appendix H.1 in Appendix H.1, the lead agencies simply listed the mitigated emissions without providing information on the mitigation measures used, control efficiencies associated with the mitigation measures, any assumptions used, etc. The same approach was used for mitigated phase 2 construction emissions. Without this additional information, staff could not confirm the mitigated construction emission results.

SCAQMD-12

Construction Mitigation Measures

MM AQ-3 Construction Equipment Standards

SCAQMD-13

9. In MM AQ-3, the lead agencies commit to using Tiers 2 and 3 construction equipment. Given that it may take longer to obtain project approval than currently estimated and the fact that construction will last over a period of 30 months, SCAQMD staff recommends that the lead agencies include a commitment to use off-road equipment greater than 50 hp that meets Tier 4 interim/final off-road standards.

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SCAQMD-14

MM AQ-5: Best Management Practices (BMPs)

10. SCAQMD staff recommends modifying point #3 of MM AQ-5 as follows.

3. Restrict idling of construction equipment and on-road heavy-duty trucks to a maximum of five minutes when not in use.

Other mitigations that could be considered by the lead agencies for incorporating into this mitigation measure to reduce exposure to diesel particulate matter from on-road heavy-duty trucks used during construction include the following:

- Maintain a minimum buffer zone of 300 meters between truck traffic and sensitive receptors;
- Improve traffic flow by signal synchronization;
- Enforce truck parking restrictions;
- Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.;
- Reroute construction trucks away from congested streets or sensitive receptor areas; and
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;

SCAQMD-15

MM AQ-6: Additional Fugitive Dust Controls

11. In MM AQ-6 on page 3.2-47 of the Draft SEIS/SEIR, the lead agencies assume 90 percent control efficiency for uncontrolled PM10 fugitive dust emissions from soil disturbance. This control efficiency is based on the lead agencies' assumption that watering two times per day will achieve a 75 percent reduction (see comment #4 above) in addition to the fugitive dust control measures listed in the bullet points. A fugitive dust control efficiency of 90 percent is difficult to achieve. For example, according to the Western Regional Air Partnership, one additional watering per day, for a total of three waterings per day, achieves a control efficiency of 61 percent¹. Therefore, SCAQMD staff requests that the lead agencies document the control efficiencies for each fugitive dust control measure to demonstrate that 90 percent control efficiency can be achieved. In the event that 90 percent control efficiency cannot be demonstrated, the analysis of mitigated fugitive dust emissions should be revised accordingly. Alternatively, the lead agencies should describe and implement a process to select and implement additional BACMs to achieve the 90 percent control performance standard.

SCAQMD staff recommends that the second bullet point of MM AQ-6 be modified as follows.

¹ WRAP Fugitive Dust Handbook, September 7, 2006
(http://www.wrapair.org/forums/dej/f/fdh/content/FDHandbook_Rev_06.pdf)

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- Contractors shall apply approved non-toxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas or replace groundcover in disturbed areas (previously graded areas inactive for ten days or more).

SCAQMD-15

SCAQMD staff recommends that the fourth bullet point of MM AQ-6 be modified as follows.

SCAQMD-16

- Trucks hauling dirt, sand, or gravel shall be covered ~~or shall maintain at least 2 feet of freeboard~~ in accordance with Section 23114 of the California Vehicle Code.

Finally, SCAQMD staff also recommends for consideration by the lead agencies the following additional bullet points for incorporation into MM AQ-6 (see also MM 4G-12) or incorporate into other appropriate mitigation measures:

SCAQMD-17

- Pave road and road shoulders;
- Require the use of clean-fueled sweepers pursuant to SCAQMD Rule 1186.1 and SCAQMD Rule 1186 certified street sweepers and sweep streets at the end of the each day if visible soil is carried onto paved roads onsite or roads adjacent to the site to reduce fugitive dust emissions;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable; and
- Require the use of electrified truck spaces for all truck parking or queuing areas

MM AQ-10: Fleet Modernization for On-road Trucks

SCAQMD-18

12. SCAQMD staff recommends revising MM AQ-10 to require use of trucks that meet or exceed the year 2007 truck emission standards for NOx and PM through one of the following approaches:

- Use of trucks that meet the 2007 emission standard; or
- Retrofit existing heavy-duty trucks with diesel particulate filters (DPFs) for PM control and NOx oxidation catalysts for NOx control verified by CARB to achieve Tier 3 standards; or

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SCAQMD-18

- Use alternative fuels such as LNG.

SCAQMD-19

Operational Emissions

13. In the project description on page 2-9, the lead agencies state that the existing rail tracks located at the Terminal Island Site (Tank Farm Site 2) will continue to operate and that the future use of the site is expected to be for liquid bulk storage "either for the proposed Project or alternative or for some future, as yet unknown, project." These rail emission estimates are not included in the Draft SEIS/SEIR. If the existing rail tracks indicate that the proposed project will include the use of rail operations, any emissions generated by rail transport should be included in the Final SEIS/SEIR and the operation emission estimate tables should be revised. The Final SEIS/SEIR should also include the equations, emission factors, methodologies, etc., used to calculate the rail activity emissions.

Operation Mitigation Measures

SCAQMD-20

MM AQ-14: Low Sulfur Fuel Use in Main Engines, Auxiliary Engines and Boilers

14 As noted in other comment letters on Port projects, reducing fuel sulfur is one of the most significant and feasible means of expeditiously reducing particulate and sulfur oxides emissions from a shipping terminal. SCAQMD staff believes that, given the experience implementing low sulfur fuel use to date by Maersk, the phase-in schedule proposed in the DEIR can feasibly be accelerated. According to the CEQA document for the proposed Port of Long Beach Middle Harbor project, the lead agency has committed to using 0.2 percent low sulfur fuel upon project approval. In addition, all vessels should utilize 0.1 percent sulfur fuel by 2010.

Therefore, SCAQMD staff recommends that the lead agencies accelerate the implementation of low sulfur fuel in main and auxiliary engines of vessels calling at the Berth 408, as follows:

- Within six months after approval of the proposed project, all vessels calling at the terminal shall use fuel with sulfur content no higher than 0.2 percent when they are within 40 nm of Point Fermin.
- On or before January 1, 2010, all vessels shall use fuel in main and auxiliary engines with sulfur content no higher than 0.1 percent within 40 nm of Point Fermin.

SCAQMD staff believes that accelerating the use of low sulfur fuel as suggested above is feasible and should be implemented by the lead agencies. This amendment would also help implement the South Coast AQMP control measure that calls for 0.1 percent sulfur fuel for marine vessels by 2010.

SCAQMD-21

MM AQ-15. Alternative Maritime Power (AMP)

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15. MM AQ-15 provides a schedule for percentage of ships calling at berth 408 that would be required to AMP. SCAQMD staff believes that the AMP schedule can be accelerated as follows.

SCAQMD-21

The Port will design and incorporate into Berth 408 all the necessary components to make full AMP available for those vessels capable of utilizing such facilities. During the last quarter of 2011, all ships retrofitted must utilize the AMP at a 100 percent compliance rate and all frequent caller ships shall be required use the AMP system or AMP-equivalent emission reduction at a 100 percent compliance rate.

SCAQMD staff recommends that MM AQ-15 be revised to require the use of emission control technologies that can achieve the same or greater emission reductions as shore-side power for ships unable to use shore-side power.

MM AQ-16. Slide Valves

SCAQMD-22

16. The SCAQMD recommends the following changes to MM AQ-16 on page 3.2-58 of the Draft SEIS/SEIR:

“Ships calling at Berth 408 shall be equipped with slide valves or a slide valve equivalent (an engine retrofit device designed to reduce the sac volume in fuel valves of main engines in Category 3 marine engines) in main engines by project operation start up date 2010 to achieve a compliance rate of 95 percent the maximum extent possible.”

Health Risk Assessment (HRA)

SCAQMD-23

17. In the project description on page 2-9, the lead agencies state that the existing rail tracks located at the Terminal Island Site (Tank Farm Site 2) will continue to operate and that the future use of the site is expected to be for liquid bulk storage “either for the proposed Project or alternative or for some future, as yet unknown, project.” The lead agencies, however, do not include a detailed description of the current rail activity at the Terminal Island site or the proposed activity alluded to on page 2-9 for the proposed project Tank Farm Site 2. In addition to not describing this rail activity in the existing setting or estimating potential rail emissions, the potential cancer risk from the diesel-powered railroad engines has not been calculated in the Draft SEIS/SEIR. The cancer risk from these engines should be estimated in the HRA and the HRA should be revised in the Final SEIS/SEIR to include the potential risk from the rail engine diesel-particulate emissions to any sensitive receptors affected by potential project rail operations.

The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be downloaded from the AQMD’s CEQA web pages at the following URL: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc

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- SCAQMD-1.** Thank you for your review of and comments on the Draft SEIS/SEIR.
- SCAQMD-2.** The comment is acknowledged and appreciated.
- SCAQMD-3.** The additional rules and regulations have been added to the document.
- SCAQMD-4.** The references on Page 3.2-7 have been revised in the Final SEIS/SEIR to reflect the Basin's current CO attainment status. The USEPA redesignated the SCAB as in attainment of the NAAQS for CO in June 2007.
- SCAQMD-5.** Table 3.2-10 on Page 3.2-35 of the Draft SEIS/SEIR has been modified under the tank column to include the vapor destruction unit.
- SCAQMD-6.** The contractor will achieve a control efficiency of 75 percent by applying Best Available Control Measures (BACMs). Examples of the BACMs that may be applied includes: 1) pre-watering material prior to truck loading, 2) limiting vehicular travel to established unpaved roads and unpaved parking lots, 3) directing construction traffic over established haul routes, and 4) stabilizing surface soil where support equipment and vehicles will operate. Some of the above examples may be applied in conjunction with other approved SCAQMD Rule 403 BACMs.
- SCAQMD-7.** Construction worker Personally Owned Vehicle (POV) emissions were calculated using URBEMIS. Emission estimates for construction worker POV emissions were calculated from the workers' originating location to the actual construction site. In order to verify that this was the worst case scenario a separate calculation was done comparing emissions based on worker transport buses and based on POV emissions from a staging area to the construction site. This analysis showed that the difference between these two calculations was negligible. As a result, rather than using worker transport buses, for air quality modeling purposes the emissions from construction worker transit to the construction site were estimated as if POVs were used rather than transport buses. The POV estimates are included in Table H.1.PP.Un.Const-2 and Table H.1.PP.Un.Const-3 (unmitigated case) and Table H.1.PP.Mit.Const-2 and Table H.1.PP.Mit.Const-3 (mitigated case).
- SCAQMD-8.** Construction worker POV emissions were calculated using URBEMIS, which accepts only one variable, the square footage of buildings to be constructed. The POV emissions were calculated in two parts: 1) Construction of the Administration Building, and 2) Construction of all other aspects of the Project, including pipeline construction, tank farm construction, and wharf construction. Construction of the Administration Building was calculated in URBEMIS in the category of General Office Building and the construction of all other aspects of the Project was calculated in URBEMIS in the category of General Heavy Industry. URBEMIS uses default values for worker commuter trip rates, trip primary percentages, trip diverted percentages, and trip pass-by percentages, to calculate POV emissions. The values used for the General Office Building category analysis are: 57,300 square feet for the building being constructed, 11.01 trips per day per 1,000 square feet of general office building, 35% worker commuter trip, 75% trip primary, 20% trip diverted, 5% trip pass-by. The values used for the General Heavy Industry category analysis are: 75.0 acres for the total construction, 6.75 trips per day per acre of general

heavy industry, 90% worker commuter trip, 90% trip primary, 5% trip diverted, 5% trip pass-by.

SCAQMD-9. As explained in Section 2.4.3 of the Draft SEIS/SEIR, construction materials would be delivered by a combination of trucks, rail, OGV, and barges, but in some cases the specific method has not yet been identified with complete certainty. For the purposes of the air quality analysis, it was observed that materials that could be delivered via rail would, if not be delivered by rail, be delivered via Heavy Duty Diesel Trucks (HDDT). The air quality modeling team performed an analysis that determined that the emissions per ton of materials delivered would be higher using HDDT in comparison to rail. For this reason, to provide for a conservative analysis of emissions, it was assumed that all land-based delivery of construction materials would occur via HDDT.

SCAQMD-10. The peak daily Phase I unmitigated construction emissions in summary Table H.1.PP.Un.Const-1 in Appendix H.1 is correct. Peak daily Phase I unmitigated construction emissions in Table 3.2-11 in Section 3.2 are incorrect and have been corrected. The CEQA and NEPA significance findings do not change as result of these edits in Section 3.2. An additional footnote has been included in Table 3.2-11 to clarify what emission sources contribute to the peak daily construction emissions.

SCAQMD-11. The peak daily phase mitigated construction emissions in summary Table H.1.PP.Mit.Const-1 in Appendix H.1 is correct. Peak daily Phase I mitigated construction emissions in Table 3.2-13 in Chapter 3 are incorrect and have been corrected. The CEQA and NEPA significance findings do not change as result of these edits in Section 3.2. An additional footnote has been included in Table 3.2-13 to clarify what emission sources contribute to the peak daily construction emissions.

Phase 2 unmitigated construction and Phase 2 mitigated construction emissions are correct as presented in the Draft SEIS/SEIR. Stone delivery does not occur during Phase 2 construction. The only emissions are from Tank Farm Site 2 construction and POV emissions.

SCAQMD-12. The mitigated construction emission results for peak daily Phase I and Phase 2 construction emissions were calculated after incorporating emissions reductions from MM AQ-3 and MM AQ-5 through AQ-10, which are described in Section 3.2.4.6.1 of the Draft SEIS/SEIR. Appendix H1 provides emission factors for specific pollution sources for the unmitigated and mitigated case, from which an interested party could derive specific emissions reduction efficiencies.

As requested by the commenter, the following tables provide control efficiencies associated with the construction mitigation measures.

Phase I Construction

Mitigation Measure	Construction Activity	Reduction Efficiency (%)					
		VOC	CO ⁴	NO _x	SO _x	PM ₁₀	PM _{2.5}
MM AQ-3	Pier 400 Marine Terminal and Wharf Construction ¹	44	-43	28	0	17	18

Phase I Construction

Mitigation Measure	Construction Activity	Reduction Efficiency (%)					
		VOC	CO ⁴	NO _x	SO _x	PM ₁₀	PM _{2.5}
MM AQ-6	Pipeline Construction ²	---	---	---	---	60	60
MM AQ-3	Pipeline Construction	0	-26	23	0	40	40
MM AQ-3	Tank Farm Site #1 ²	0	-33	19	0	34	34
MM AQ-6	Tank Farm Site #1	---	---	---	---	60	60
MM AQ-3	Tank Farm Site #2 ²	0	-32	21	0	9	31
MM AQ-6	Tank Farm Site #2	---	---	---	---	60	60
MM AQ-7	Stone Delivery ³	19	19	18	16	19	18

¹ MM AQ-1, MM AQ-2, and MM AQ-4 through MM AQ-12 do not have control efficiencies computed.
² MM AQ-1, MM AQ-2, MM AQ-4, MM AQ-5, and MM AQ-7 through MM AQ-12 do not have control efficiencies computed.
³ MM AQ-1 through MM AQ-6 and MM AQ-8 through MM AQ-12 do not have control efficiencies computed.
⁴ Negative reduction efficiency represents where emissions would increase as a result of the mitigation measure.

Phase II Construction

Mitigation Measure	Construction Activity	Reduction Efficiency (%)					
		VOC	CO ¹	NO _x	SO _x	PM ₁₀	PM _{2.5}
MM AQ-1	Tank Farm Site #2	---	---	---	---	---	---
MM AQ-2	Tank Farm Site #2	---	---	---	---	---	---
MM AQ-3	Tank Farm Site #2	6	-32	22	0	41	41
MM AQ-4	Tank Farm Site #2	---	---	---	---	---	---
MM AQ-5	Tank Farm Site #2	---	---	---	---	---	---
MM AQ-6	Tank Farm Site #2	---	---	---	---	60	60
MM AQ-7	Tank Farm Site #2	---	---	---	---	---	---
MM AQ-8	Tank Farm Site #2	---	---	---	---	---	---
MM AQ-9	Tank Farm Site #2	---	---	---	---	---	---
MM AQ-10	Tank Farm Site #2	---	---	---	---	---	---
MM AQ-11	Tank Farm Site #2	---	---	---	---	---	---
MM AQ-12	Tank Farm Site #2	---	---	---	---	---	---

¹ Negative reduction efficiency represents where emissions would increase as a result of the mitigation measure.

SCAQMD-13. Mitigation Measure AQ-3 has been modified as follows:

Prior to and including December 31, 2011: All on-site mobile diesel-powered construction equipment greater than 50 hp, except derrick barges and marine vessels shall meet the Tier 2 emission standards as defined in the USEPA Non-Road Diesel Engine Rule (USEPA 1998). In addition, all construction equipment greater than 50 hp shall be retrofitted with a CARB-certified Level 3 diesel emissions control device.

From January 1, 2012 through December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier-3 emission off-road emission standards, at a minimum and shall be retrofitted with a CARB certified Level 3 diesel emissions control device.

From January 1, 2015 on: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier-4 emission off-road emission standards, at a minimum and shall be retrofitted with a CARB certified Level 3 diesel emissions control device.

This mitigation measure shall be met, unless one of the following circumstances exists and the contractor is able to provide proof that any of these circumstances exists:

- A piece of specialized equipment is unavailable in a controlled form, or within the required Tier level, within the state of California, including through a leasing agreement.
- A contractor has applied for necessary incentive funds to put controls on a piece of uncontrolled equipment planned for use on the project, but the application process is not yet approved, or the application has been approved, but funds are not yet available.
- A contractor has ordered a control device for a piece of equipment planned for use on the project, or the contractor has ordered a new piece of controlled equipment to replace the uncontrolled equipment, but that order has not been completed by the manufacturer or dealer. In addition, for this exemption to apply, the contractor must attempt to lease controlled equipment to avoid using uncontrolled equipment, but no dealer within 200 miles of the project has the controlled equipment available for lease.

SCAQMD-14. MM AQ-5 has been modified as shown below to incorporate the recommendation to enforce truck parking restrictions. The other mitigations suggested in the comment have been incorporated into MM AQ-5 to reduce exposure to diesel particulate matter from on-road heavy duty trucks.

MM AQ-5: Best Management Practices (BMPs)

The following types of measures are required on construction equipment (including on-road trucks):

1. Use of diesel oxidation catalysts and catalyzed diesel particulate traps
2. Maintain equipment according to manufacturers' specifications
3. Restrict idling of construction equipment and on-road heavy-duty trucks to a maximum of 5 minutes when not in use
4. Install high-pressure fuel injectors on construction equipment vehicles
5. Maintain a minimum buffer zone of 300 meters between truck traffic and sensitive receptors
6. Improve traffic flow by signal synchronization

7. Enforce truck parking restrictions
8. Provide on-site services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria services, automated teller machines, etc.
9. Re-route construction trucks away from congested streets or sensitive receptor areas
10. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

SCAQMD-15. Regarding the issue of documenting the control efficiency, please see the response to comment SCAQMD-6. In addition, the Port will apply additional mitigation measures per MM AQ-6. This mitigation measures are expected to control fugitive dust emissions an additional 60% in addition to the 75% in the unmitigated case, thus resulting in a total of 90% control from uncontrolled levels. Regarding the issue of proposed modifications to MM AQ-6, the measure has been modified according to the comment as shown below:

MM AQ-6: Additional Fugitive Dust Controls

The construction contractor shall reduce fugitive dust emissions by 90 percent from uncontrolled levels. The Project construction contractor shall specify dust-control methods that will achieve this control level in a SCAQMD Rule 403 dust control plan. Their duties shall include holiday and weekend periods when work may not be in progress.

Measures to reduce fugitive dust include, but are not limited to, the following

- Active grading sites shall be watered one additional time per day beyond that required by Rule 403.
- Contractors shall apply approved non-toxic chemical soil stabilizers according to manufacturer's specifications to all inactive construction areas or replace groundcover in disturbed areas (previously graded areas) inactive for ten days or more.
- Construction contractors shall provide temporary wind fencing around sites being graded or cleared.
- Trucks hauling dirt, sand, or gravel shall be covered ~~or shall maintain at least 2 feet of freeboard~~ in accordance with Section 23114 of the California Vehicle Code.
- Construction contractors shall install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off tires of vehicles and any equipment leaving the construction site.
- Pave road and road shoulders.
- Require the use of clean-fueled sweepers pursuant to SCAQMD Rule 1186 and Rule 1186.1 certified street sweepers. Sweep streets at the end of each day if visible soil is carried onto paved roads on-site or roads adjacent to the site to reduce fugitive dust emissions.

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation.
- Traffic speeds on all unpaved roads shall be reduced to 15 mph or less.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable.
- Require the use of electrified truck spaces for all truck parking or queuing areas if feasible. Alternatively, trucks could be required to turn off if parked or stopped in idle for more than 15 minutes.

SCAQMD-16. The fourth bullet point of MM AQ-6 has been modified according to the comment as shown in Response to Comment SCAQMD-15.

SCAQMD-17. The additional bullet points have been incorporated into MM AQ-6 according to the comment as shown in Response to Comment SCAQMD-15.

SCAQMD-18. Per the LAHD Sustainable Construction Guidelines for Reducing Air Emissions, all on-road heavy-duty diesel trucks with a GVWR of 19,500 pounds or greater shall comply with USEPA 2004 on-road emission standards for PM₁₀ and NO_x prior to December 31, 2011. Beginning January 1, 2012 on, all on-road heavy-duty diesel trucks with a GVWR of 19,500 pounds or greater shall comply with USEPA 2007 on-road emission standards for PM₁₀ and NO_x. According to the project construction schedule, construction will be completed prior to December 31, 2011. As a result, USEPA 2004 on-road emission standards have been utilized consistent with the Port's Sustainable Construction Guidelines. The Guidelines were developed based on equipment availability. The Port conducted a survey in early 2008 of construction contractors and equipment providers, including information on future equipment orders. As a result of this survey, it was found that 2007 compliant trucks would not be available in large quantities before 2012. However, as described above, the Port will encourage use of USEPA 2007 compliant trucks through the Environmental Compliance Plan required of all contractors.

Each contractor will be required to submit an Environmental Compliance Plan for work completed as part of the proposed Project. The Environmental Compliance Plan will be developed by the contractor and must:

- Identify the overall construction area
- Identify work hours and days
- Describe the overall construction scope of work
- Identify all construction equipment to be used to complete the project
- Identify all applicable mitigation measures depending on scope of work and construction equipment list
- Develop a plan to adhere to all applicable mitigation measures
- Develop a record-keeping system to track mitigation and any pertinent permits and/or verification documents such as equipment specifications, equipment logs, and receipts
- Develop a tracking system to ensure mitigation is completed within the specified plan

- Identify one lead person, plus one back-up person to be responsible for environmental compliance
- Identify additional measures, practices or project elements to further reduce environmental impacts.

The Environmental Compliance Plan must be submitted to the Port of Los Angeles for review prior to commencing construction. The Port of Los Angeles reserves the right to modify the Plan, in conjunction with the contractor, to identify additional measures, practices or project elements to further reduce environmental impacts.

SCAQMD-19. The referenced statement on Page 2-9 describes the Port’s intention regarding the Terminal Island site; however, as indicated in Draft SEIS/SEIR Chapter 2 (Project Description) and throughout the document, the proposed Project does not include any use of the existing rail tracks or include any rail operations (other than potentially to deliver construction materials; on this issue, see the response to comment SCAQMD-9).

SCAQMD-20. Please see response to USEPA-8. Mitigation Measure AQ-14 has been amended as shown below:

MM AQ-14 Low Sulfur Fuel

All ships (100%) calling at Berth 408 shall use 0.2% low sulfur fuel within 40 nm of Point Fermin on their outbound leg and while hotelling at the Project, beginning on day one of operation. Vessels calling at Berth 408 shall also use 0.2% low sulfur fuel within 40 nm of Point Fermin on their inbound leg, except where circumstances (such as ships with a mono-tank system or ships originating from a Port where low sulfur fuel is not available) make such use infeasible on the inbound leg. Regardless, the applicant shall adhere to the following annual phase-in schedule which identifies the minimum allowable annual percentage of vessels in the fleet calling at Berth 408 which shall use 0.2% low sulfur fuel within 40 nm of Point Fermin on their inbound leg. Ships calling at Berth 408 shall use low sulfur fuel in main engines, auxiliary engines, and boilers within 40 nm of Point Fermin (including hoteling for non-AMP ships) in the annual percentages in fuel requirements as specified below:

PLAMT Fuel Switch for Main Engines, Auxiliary Engines, and Boilers

Year	Main Engines/Auxiliary Engines/Boilers					
	Inbound			Hoteling and Outbound		
	HFO	0.50%	0.20%	HFO	0.50%	0.20%
1	0	100	0	0	0	100
2	0	100	0	0	0	100
3	0	100	0	0	0	100
4	0	80	20	0	0	100
5	0	50	50	0	0	100
6	0	50	50	0	0	100
7-30	0	10	90	0	0	100

~~In addition, all callers carrying 0.2% low sulfur shall use 0.2% low sulfur fuel within 40 nm of Point Fermin both on the inbound and outbound leg. Six months prior to operation of Berth 408 the applicant shall lead the effort, with Port support, in notifying~~

all fuel suppliers/shippers of the low sulfur fuel requirements. This notification shall be achieved through publication of a notice in Bunker World (or other similar fuel supply trade publication) and by notification to all Berth 408 customers.

The comment also calls for the phase-in of fuel with a maximum sulfur content of 0.1 percent. To allow for some margin of error and product contamination in the distribution system, when a shipping line orders 0.2 percent sulfur fuel, the shipping line is actually receiving a fuel with a lower sulfur content of between 0.13 and 0.16 percent. Therefore, if the mitigation measure required 0.1 percent fuel, the supplier would have to provide fuel at a content of lower than 0.1 percent, which might not be possible in current refineries. Additionally, 0.2 percent is consistent with the CAAP. In developing and approving the CAAP, the Ports of Los Angeles and Long Beach met and collaborated with agencies (including CARB, AQMD, and USEPA), environmental and community groups, and the shipping industry. As a result of this collaborative process, 0.2% sulfur fuel was found to be feasible from port-wide perspective and use of this fuel represents consensus.

SCAQMD-21. Please see response to USEPA-8. Mitigation Measure AQ-15 has been amended as shown below:

MM AQ-15 AMP

By end of year 2 of operation, all ships capable of utilizing AMP and all frequent callers (2 or more a year), shall use AMP at the facility. At minimum, ships calling at the Berth 408 facility shall use AMP ~~Ships calling at Berth 408 facility shall use AMP while hoteling at the Port in the following at minimum percentages while hoteling at the Port in the following at minimum percentages:~~

- By end of year 2 of operation – 6 (4%) vessel calls
- By end of year 3 of operation – 10% of annual vessel calls
- By end of year 5 of operation – 15% of annual vessel calls
- By end of year 10 of operation – ~~40~~ 50% of annual vessel calls
- By end of year 16 of operation – ~~70~~ 80% of annual vessel calls

As discussed in Chapter 3.2, use of AMP would enable ships to turn off their auxiliary engines during hoteling, leaving the boiler as the only source of direct emissions. An increase in regional power plant emissions associated with AMP electricity generation is also assumed. Including the emission from ship boilers, a ship hoteling with AMP reduces its criteria pollutant emissions 88 to 98 percent, depending on the pollutant, when compared to a ship hoteling without AMP and burning residual fuel in the boilers.

AMP on container vessels and cruise ships is directed at reducing emissions from the relatively large hoteling loads present on these vessels. Tankers have smaller hoteling loads but also must support cargo offloading operations by producing steam power. The steam production capability cannot be replaced without complete vessel reconstruction. However, as mentioned earlier, the Project design includes a feature to minimize steam generation requirements via the use of shore-side electric pumps.

The Port will design and incorporate into Berth 408 all the necessary components to make full AMP available for those vessels capable of utilizing such facilities. The following addition has been included the AMP discussion in the Final SEIS/SEIR.

In the alternative, the Port may, upon application by the tenant, and subject to all applicable laws and regulations, permit the tenant to install and employ and Alternative Maritime Emission Control System (AMECS) system, either in combination with or in place of AMP as designated in the Port's permit, to satisfy the requirements of this mitigation measure; provided that the Port first finds, based on environmental review prepared pursuant to CEQA, all of the following:

- (1) that AMECS is a feasible mitigation measure;
- (2) that the Port and CARB have verified that use of AMECS, as permitted by the Port, would achieve emissions reductions equivalent to or better than those identified in this SEIS/SEIR as occurring under this mitigation measure through the use of AMP alone; and
- (3) that either
 - a. the use of AMECS, as permitted by the Port to achieve the purposes of this mitigation measure, would result in no new or substantially more severe significant adverse impact to the environment, or
 - b. any new or substantially more severe adverse impact to the environment resulting from the use of AMECS as permitted by the Port to achieve the purposes of this mitigation measure would be mitigated to a less than significant level, or
 - c. overriding considerations, as defined under CEQA, make appropriate the use of AMECS as permitted by the Port to achieve the purposes of this mitigation measure.

Regarding the suggestion for 100 percent compliance with AMP, the percentages required in MM AQ-15 represent aggressive phase-in requirements for a marine oil tanker. Both CARB and POLA have considered the applicability of cold ironing to tankers and concluded that they are not good candidates. The CARB adopted a cold ironing rule in 2007 that did not include tankers. It is currently considering other measures applicable to tankers but no regulation has been proposed. Likewise, the Clean Air Action Plan (CAAP) concluded that shore power is generally best suited for vessels that make multiple calls per year, require significant demand while at berth, and vessels that will continue to call at the same terminal for multiple years. In general, crude oil tankers do not fit within these categories. For tankers, the CAAP concluded that only crude tankers that have diesel-electric powered pumps were considered to be good candidates. The CAAP suggested alternative hotelling emissions reduction technologies for vessels that do not fit the shore power model. Such technologies include shore-powered dockside electrical pumps for tankers to reduce on-board pumping loads. Berth 408 has proposed shore-powered pumps to be used on all vessel calls. This is in conformance with the feasibility findings of the CAAP.

Currently, only two tankers in the world crude oil tanker fleet are equipped for cold ironing and they are both diesel-electric vessels. (The world crude oil tanker fleet consists of approximately 1,200 vessels that could be expected to call at Berth 408 (Aframax or larger), and it is believed that there are only 9 crude oil tankers that are diesel-electric.) The two AMP-equipped tankers are owned by British Petroleum and

have been modified for use at BP's Berth 121 at the Port of Long Beach but have yet to make a single call using AMP due to a series of technical issues. The BP tankers are not configured to be able to utilize the proposed AMP facility at Berth 408. Thus, to date, the successful application of cold ironing technology to crude oil tankers has not been demonstrated despite several years of effort by BP and funding by the Port of Long Beach. This is an extremely aggressive schedule considering that no crude oil tanker likely to call at Berth 408 is equipped for cold ironing. Plains expects the shore power requirement in early years will be met by retrofitting a small number of vessels traveling between POLA and South America, which would make sense because they are most likely to be frequent callers.

SCAQMD-22. Please see response to SCAQMD-21. In addition to AMP retrofits, slide valves are not industry standards on marine-oil tankers. The proposed mitigation measure assumes that the slide valves are used to the greatest extent feasible and does not mandate 100% use on day one. The Port acknowledges that slide valves are not marine-oil tanker industry standards and may be difficult or infeasible to implement. The document did not assume any emissions reductions from this measure because of the difficulties with implementation. The Port will work with Plains and its customers to install slide valves

SCAQMD-23. Please see the response to comment SCAQMD-19. The referenced statement on Page 2-9 describes the Port's intention regarding the Terminal Island site; however, as indicated in Draft SEIS/SEIR Chapter 2 (Project Description) and throughout the document, the proposed Project does not include any use of the existing rail tracks or include any rail operations. Therefore, the analysis did not include rail emissions since the Project has no, and will not change, rail emissions, and therefore there is no purpose in comparing existing rail emissions to rail emissions under the Project

SOUTHERN CALIFORNIA



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June 12, 2008

Dr. Ralph Appy
Director Environmental Management Div.
425 South Palos Verdes Street
San Pedro, CA 90731

RE: SCAG Clearinghouse No. I 20080322 Pacific L.A. Marine Terminal LLC Crude Oil Terminal Project

Dear Dr. Appy:

Thank you for submitting the **Pacific L.A. Marine Terminal LLC Crude Oil Terminal Project** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Pacific L.A. Marine Terminal LLC Crude Oil Terminal Project**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **May 1-31, 2008** Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1857. Thank you.

Sincerely,

LAVERNE JONES, Planning Technician
Environmental Planning Division

SCAG-1

Southern California Association of Governments, June 12, 2008

SCAG-1. Thank you for your review of the Draft SEIS/SEIR.



CITY OF

RANCHO PALOS VERDES

PLANNING, BUILDING, & CODE ENFORCEMENT

23 July 2008

Commander, U.S. Army Corps of Engineers
Los Angeles District
% Dr. Spencer D. MacNeil
PO Box 532711
Los Angeles, CA 90053-2325

Port of Los Angeles
Environmental Management Division
% Dr. Ralph Appy, Director
425 S. Palos Verdes St.
San Pedro, CA 90731

SUBJECT: Comments on Draft Supplemental Environmental Impact Statement/Supplemental Environmental (SEIS/SEIR) Impact Report for the Pier 400, Berth 408 (Pacific L.A. Marine Terminal) Project

Dear Drs. MacNeil and Appy:

The City of Rancho Palos Verdes is in receipt of the Notice of Availability for the above-mentioned project. The following are our comments on the Draft SEIS/SEIR:

RPV-1

1. With respect to Air Quality, the increasing development within the Port of Los Angeles over the past few years has lead to deteriorating air quality for our residents, especially those who reside in the neighborhoods along Western Avenue. The City of Rancho Palos Verdes is concerned that the introduction of a crude oil transfer facility to the Port will exacerbate these adverse air quality impacts. Has the Port considered alternative locations for such a facility that would be located further from the most populated areas near the Port (perhaps even an off-shore facility)? We encourage the Port to explore all feasible options before introducing this new use to Pier 400.

RPV-2

2. With respect to Hazards and Hazardous Materials, the City of Rancho Palos Verdes is concerned that the new transfer facility and network of distribution pipelines place the general public at risk in the event of an accidental (or intentional) explosion. Such a catastrophic event would have dire effects upon nearby neighborhoods. Again, has the Port considered alternative locations for this facility that would be located further from populated areas?

RPV-3

3. As you may be aware, the Los Angeles County Sanitation Districts are considering a project to construct a new joint outfall pipeline (i.e., the "Clearwater Program"). The Sanitation Districts' existing outfall pipelines run under residential neighborhoods on the east side of our City, and the Sanitation Districts own property in Rancho Palos Verdes (currently leased to the City for use as Eastview Park) that includes access shafts for these pipelines. Among the alternatives for the construction of the new joint outfall pipelines would be the use of the Eastview Park property as a staging



RPV-3 ↑ area for tunneling operations, a lengthy and disruptive process that would adversely affect the quality of life for nearby residents in Rancho Palos Verdes and San Pedro. However, an alternative pipeline alignment that is under consideration would place the staging area for the tunneling operations at the site of the former LAXT facility on Terminal Island (i.e., "Potential Shaft Site No. 6"). The City of Rancho Palos Verdes is supportive of this alternative because it would place the most disruptive surface elements of the construction process as far as possible from surrounding residents. However, we note that the Pacific L.A. Marine Terminal project currently proposes a tank farm on the former LAXT site. The City encourages the Port to consider project alternatives that either relocate the proposed tank farm or modify it in such a manner as not to foreclose the possible future use of a portion of the former LAXT site for the Sanitation Districts' Clearwater Program. Additional information about the Clearwater Program is available at <http://www.clearwaterprogram.org/clearwater/>.

RPV-4 Thank you for the opportunity to comment on this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5228 or via e-mail at kitt@rpv.com.

Sincerely,



Kit Fox, AICP
Associate Planner

cc: Mayor Stern and City Council
Carolyn Lehr, City Manager
Carol Lynch, City Attorney
Joel Rojas, Director of Planning, Building and Code Enforcement

City of Rancho Palos Verdes, July 23, 2008

RPV-1. As noted in Section 2.5.3 of the Draft SEIS/SEIR, the Port and USACE considered a wide range of alternatives to the proposed Project, including offshore mooring. The offshore mooring alternative is addressed specifically in Section 2.5.3.5. Although offshore mooring would have some advantages from an environmental perspective compared to the proposed Project, the Port and USACE found that this alternative would also have a number of significant disadvantages, including the potential for weather-induced interruptions of supply; the potential for accidents to result in releases of oil on rough ocean waters, where cleanup would be far more difficult than inside the harbor; the environmental impacts to the marine community associated with the construction of a pipeline several miles long; and the very high cost of construction. In addition, Appendix F of the Draft SEIS/SEIR contains a report by an engineering consulting firm (Moffatt & Nichol) that considers potential sites for an offshore mooring and concludes that “an offshore single point mooring location does not appear to be feasible, primarily for cost reasons and secondarily because of environmental and technical challenges.” Challenges include 1) accidents resulting in releases of oil on rough ocean waters, where cleanup would be far more difficult than inside the harbor; 2) the environmental impacts to the marine community associated with the construction of a pipeline several miles long; and 3) the very high cost of construction.

The Draft SEIS/SEIR proposes adequate alternatives under CEQA/NEPA. Under NEPA/CEQA, an EIS/EIR is required to evaluate a reasonable range of feasible alternatives to reduce or avoid a project’s significant impacts. The range of alternatives examined need not exceed a reasonable range which allows a reasoned choice among the alternatives and the proposed Project, and an EIS/EIR need not focus on alternatives that are not feasible or would not avoid or reduce Project impacts. Many alternatives discussed in the Draft SEIS/SEIR were eliminated from further detailed analysis for reasons of infeasibility and/or ineffectiveness at avoiding or reducing Project impacts. However, one alternative involving limited crude oil throughput in certain years was carried forward (in addition to the No Federal Action/No Project Alternative and the proposed Project) for co-equal analysis in the document.

RPV-2. The SEIS/SEIR provided a detailed analysis of the potential risk posed by the proposed Project on public safety. The proposed marine terminal is located on Pier 400, which was specifically constructed to site hazardous bulk liquid terminals as far from the public as possible. Most of the pipelines that would be utilized by the proposed Project already exist and are currently in operation. The new tank farm site is located in a heavily industrialized area and also well removed from the public. As noted in the risk analysis for the proposed Project, potential impacts to public safety are considered less than significant. Sections 2.5.2 and 2.5.3 of the Draft SEIS/SEIR present the alternatives considered for the proposed Project. As shown in Section 2.5.3 of the Draft SEIS/SEIR, most alternative sites that could theoretically be available for the proposed Project would be located closer to densely populated areas and would pose a greater risk to the public than the proposed Project, and although some sites (e.g., Face E of Pier 400) are located farther from populated areas, these are not feasible for other reasons (on Face E, see Section 2.5.3.2.10 of the Draft SEIS/SEIR, and also the response to comment PCAC-EIR-7). Its disadvantages include the additional cost and environmental impact associated with the required dredging and sediment disposal. In addition, due to the angle between Pier 400 and the Federal Breakwater, it would be difficult for a VLCC to access Face E without a number of turns. These turns would slow the vessel’s approach, thereby

potentially limiting recreational access of the area (due to the number of vessel turns in a rather small area) and increase emissions from the increased number of vessel moves

RPV-3. The proposed Project will not interfere with the proposed location for staging operations at LAXT. The proposed staging site identified by the Los Angeles County Sanitation District is located southwest of the proposed location of Tank Farm 2.

RPV-4. Thank you for your review of the Draft SEIS/SEIR.

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