



October 31, 2012

Barry Wallerstein, D. Env.  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, California 91765

**Re: Supplemental Comments on the Revised Draft 2012 Air Quality Management Plan**

Dear Dr. Wallerstein:

The Port of Long Beach and Port of Los Angeles (ports) are submitting this comment letter to add to comments previously submitted on August 30, 2012.

As members of the South Coast Air Quality Management District's (AQMD) 2012 Air Quality Management Plan (AQMP) Advisory Committee, the ports have worked with AQMD staff to provide comments on the draft plan, including the emissions data being used. Included in this effort, ports' staff provided the 2008 base year emissions inventories for the port sources based on the most recent methodologies agreed upon by the Technical Working Group (TWG) in the ports' 2011 air emissions inventories.

As noted in the Draft AQMP, "*An effective AQMP relies on an adequate emission inventory.*" Discrepancies exist between the emissions inventories prepared by the ports and the inventory prepared by the AQMD. The emissions shown in the Draft 2012 AQMP are different from those prepared by the ports in cooperation with the AQMD, California Air Resources Board, and Environmental Protection Agency, during development of the San Pedro Bay Standards. If the AQMD's emissions projections for achieving attainment are incorrect, the concerns expressed in our August 30 comments are greatly increased. The emissions projections drive both the Measure IND-01 analysis and the PM<sub>2.5</sub> analysis. The basis for the Draft 2012 AQMP emissions projections is impossible to determine, because the assumptions and methodologies (including control factors and growth factors) are not disclosed.

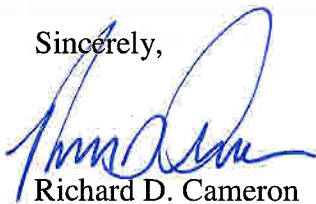
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Additionally, it concerns the ports that the AQMP has made a commitment to Measure IND-01 before AQMD has released details of its intended implementation actions against the ports, or the socioeconomic and other analyses for such actions. Elaine Chang admitted at the AQMD's October 24, 2012, meeting that it is unknown what a port compliance plan would include and that AQMD would develop it during a future rulemaking process. This violates due process, to commit to implement an AQMP measure without disclosing what AQMD's actions against the ports will be under the backstop measure, as it deprives the public and the ports of the opportunity to review and comment to influence the decision, prior to committing to it in the AQMP.

This further demonstrates that the collaborative process established by the ports and the air quality regulatory agencies remains the most appropriate forum to identify and implement strategies to reduce emissions from port-related sources.

Sincerely,



Richard D. Cameron  
Director of Environmental Planning  
Port of Long Beach



Christopher Cannon  
Director of Environmental Management  
Port of Los Angeles

AT:s

cc: Peter Greenwald, South Coast Air Quality Management District  
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