

April 15, 2021

Alan J Finio  
Maritime Administration  
Office of Environment  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Finio,

This letter is in response to your letter dated February 23, 2021 requesting South Coast AQMD to accommodate the anticipated emissions from the Port of Long Beach Pier B On-Dock Rail Support Facility Project in the Air Quality Management Plan (AQMP)/State Implementation Plan (SIP) emissions budget for general conformity purposes.

The general conformity determination process is intended to demonstrate that a proposed Federal action will not: (1) cause or contribute to new violations of a national ambient air quality standard (NAAQS); (2) interfere with provisions in the applicable SIP for maintenance of any NAAQS; (3) increase the frequency or severity of existing violations of any standard; or (4) delay the timely attainment of any standard. As such, for general conformity determination, the proposed federal action needs to conform to the latest approved SIP/AQMP.

The South Coast Air Basin (Basin) is designated as an extreme non-attainment area for ozone, serious non-attainment for PM<sub>2.5</sub> and maintenance area for Carbon Monoxide. In order to accommodate projects subject to general conformity requirements and to streamline the review process, general conformity budgets for NO<sub>x</sub> and VOC emissions are established in the AQMP. The 2016 AQMP (<https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>), which is the latest plan approved by U.E. EPA, established set aside accounts to accommodate emissions subject to general conformity requirements. The set-aside accounts include 2 tons per day (tpd) or 730 tons per year (tpy) of NO<sub>x</sub> and 0.5 tpd or 182.5 tpy of VOC each year starting in 2017 through 2030, and 0.5 tpd (182.5 tpy) of NO<sub>x</sub> and 0.2 tpd (73 tpy) of VOC each year in 2031 and thereafter.

The proposed Project involves reconfiguration and expansion of the existing Port of Long Beach Pier B On-Dock Railyard. The anticipated emissions from the proposed project exceed the General Conformity de minimis thresholds of NO<sub>x</sub> in the years 2022 and 2024 through 2035 as indicated in Tables 1 to 4 of your letter. These emissions are from construction equipment and increased locomotive activities after the completion of the proposed expansion of the on-dock rail support

facility. Detailed methodology to estimate emissions included in the general conformity determination is available on the Port of Long Beach's website, <https://www.polb.com/documents/#ceqa-nepa>

South Coast AQMD staff has reviewed the proposed project emissions based on the information provided in your letter. Based on our review, we have determined that NO<sub>x</sub> emissions above de minimis thresholds can be accommodated within the general conformity budgets established in the 2016 AQMP. The emissions accommodated in the general conformity budgets, as listed in Table 1 below, are for 2022, and 2024 through 2031, pursuant to the SIP set-aside budget established in the 2016 AQMP.

Table 1. Proposed Project Emissions Accommodated in 2016 AQMP General Conformity Budgets (tons per year)<sup>1</sup>

Year	Construction	Operation	Total
<b>2022</b>	15.28	-	15.28
<b>2024</b>	2.00	55.99	57.99
<b>2025</b>	3.16	52.45	55.61
<b>2026</b>	2.16	48.90	51.06
<b>2027</b>	2.33	46.07	48.40
<b>2028</b>	1.75	43.23	44.98
<b>2029</b>	-	40.40	40.40
<b>2030</b>	-	37.56	37.56
<b>2031</b>	-	34.73	34.73

In summary, based on our evaluation, the proposed project will conform to the latest EPA approved AQMP as the emissions from the project are accommodated within the AQMP's emissions budgets, and the proposed project is not expected to result in any new or additional violations of the NAAQS or impede the projected attainment of the NAAQS.

<sup>1</sup> Construction missions are not expected to exceed the de minimis threshold in 2023. No changes in locomotive emissions are expected due to the completion of the project in 2023, as indicated in Draft EIS, which is available at <https://polb.com/documents/#ceqa-nepainformation>. Details are provided in Table ES-1 on page ES-7, "Proposed Project - 12th Street Alternative".

If you have any questions, please contact me at (909) 396-2856 or [srees@aqmd.gov](mailto:srees@aqmd.gov) or Sang-Mi Lee, Program Supervisor at (909)-396-3169 or [slee@aqmd.gov](mailto:slee@aqmd.gov).

Sincerely,



Sarah L. Rees, Ph.D.  
Deputy Executive Officer  
Planning, Rule Development & Area Sources  
South Coast Air Quality Management District

Attachment:

Letter from Maritime Administration dated February 23, 2021

cc: Tom Kelly, US EPA Region IX  
Rongsheng Luo, SCAG  
Barbara Baird, South Coast AQMD  
Zorik Pirveysian, South Coast AQMD  
Sang-Mi Lee, South Coast AQMD  
Jillian Wong, South Coast AQMD  
Lijin Sun, South Coast AQMD

ZP:SL



U.S. Department  
of Transportation

**Maritime  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

February 23, 2021

Dr. Sarah Rees, Deputy Executive Officer  
South Coast Air Quality Management District  
Planning, Rule Development and Area Source Division  
21865 Copley Drive  
Diamond Bar, CA 91765

**Subject: General Conformity Determination Request for Port of Long Beach Pier B On-Dock Rail Support Facility Project – Emissions Inventory**

Dear Dr. Rees:

The general conformity findings outlined in this letter have been prepared by ICF on behalf of the Maritime Administration (MARAD) to summarize the anticipated direct and indirect criteria pollutant emissions for the proposed Pier B On-Dock Rail Support Facility Project (proposed Project).

The proposed Project involves reconfiguration and expansion of the existing Port of Long Beach Pier B On-Dock Railyard. This project is needed to accommodate current and future demand for container handling by rail, which has been increasing over time and is expected to continue to increase through the next decade. Project location maps are included as Attachment 1 to this letter.

As confirmed by the Southern California Association of Governments (SCAG) in their letter dated May 16, 2019 (Attachment 2), the cargo growth and mode-split projections associated with this proposed Project were previously provided to the South Coast Air Quality Management District (SCAQMD) and have been incorporated into the 2016 Air Quality Management Plan (AQMP).

This Project is subject to the National Environmental Policy Act (NEPA) and requires a General Conformity Determination under the U.S. Clean Air Act. MARAD is currently preparing the Final Environmental Impact Statement (EIS) for this Project.

Anticipated annual net Project related emissions were calculated and are presented in Table 1 in Attachment 3. As shown in Table 1, emissions of nitrogen oxides (NO<sub>x</sub>) are projected to exceed the general conformity *de minimis* level of 10 tons per year during year 2022, and years 2024 through 2035. NO<sub>x</sub> is a precursor pollutant to ozone, a pollutant which the South Coast Air Basin is designated as an “extreme” nonattainment area for. All other air emissions would be below *de minimis* levels for all years in which emissions were inventoried.



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Attachment 3, Table 2 provides the anticipated average daily NOx emissions associated with the proposed Project. Shown in Table 2, maximum daily NOx of 0.158877 tons per day are anticipated to occur in year 2024, then gradually decrease to 0.071836 tons per day by year 2035. Tables 3 and 4 in Attachment 3 provide summaries of the Project's construction- and operations-period emissions totals. This Request for General Conformity Determination and associated attachments are available on the Port of Long Beach's website at:

<https://www.polb.com/documents/#ceqa-nepa>

We respectfully request that the SCAQMD affirm that these emissions levels can be accommodated within the general conformity budget established in the Final 2016 AQMP (Appendix VI-D). We understand that this set aside budget is reserved to handle General Conformity projects that exceed *de minimis* levels.

If you have any questions or would like to discuss the undertaking in more detail, please contact Alan Finio Office of Environment at Alan.Finio@dot.gov (Phone 609-605-6848). You can also contact Chad Beckstrom or Tanvi Lal of ICF, the NEPA and air resources consultant for the project, at chad.beckstrom@icf.com or tanvi.lal@icf.com.

Sincerely,



Alan J Finio  
Maritime Administration, Office of Environment

**Attachments:**

**Attachment 1.** Regional Location Map; Project Location Aerial

**Attachment 2.** SCAG Letter Confirming RTP and AQMP Consistency

**Attachment 3.** Tables

1. Annual Combined Construction and Net Operations Emissions
2. Daily Combined Construction and Net Operations Emissions
3. Annual Construction Emissions
4. Annual Net Operations Emissions





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**Figure 1**  
**Regional Location**  
**Pier B On-Dock Rail Support Facility Project**





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**Figure 2**  
**Project Location Aerial**  
**Pier B On-Dock Rail Support Facility Project**





SOUTHERN CALIFORNIA  
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Transportation  
Cheryl Viegas-Walker, El Centro

May 16, 2019

Mr. Alan J. Finio  
Environmental Protection Specialist  
Office of Environment, W25-205  
Maritime Administration  
Department of Transportation  
Southeast Federal Center, West Bldg.  
1200 New Jersey Ave SE  
Washington, DC 20590

**Subject: EIS for Pier B On-Dock Rail Support Facility Project (RTP  
Consistency for Conformity Determination)**

Dear Mr. Finio,

The Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization for the region that encompasses the Pier B On-Dock Rail Support Facility Project at the Port of Long Beach (Project). For the purposes of determining general conformity of the Federal action associated with the Project in accordance with Section 176 (c) of the Clean Air Act, this letter is intended to confirm the use of ports transportation data in regional transportation and air quality management plans.

The Ports of Los Angeles/Long Beach (POLA/POLB) submit transportation data to SCAG to account for current and projected port activity. In particular, the POLA/POLB cargo growth is accounted for in the RTP via truck traffic volumes provided to SCAG.

The port activity data have been provided to the South Coast Air Quality Management District and incorporated into the recent 2016 South Coast Air Quality Management Plan (AQMP), and is also included in the 2016 RTP. The data transmitted to SCAG included the latest growth projections and mode-splits associated with the preferred alternative for the subject Project. The Project is listed in the RTP and has two FTIP ID numbers for the street and rail component. The FTIP numbers are "FTIP ID LA0C8094 – Pier B Intermodal Railyard Expansion" and "FTIP ID LAF7204 – Pier B Street Freight Corridor Reconstruction".



The Ports' data have been previously incorporated into quadrennial RTPs from 1994 to 2016 and into the corresponding AQMPs. SCAG has recently requested and expects to receive the cargo projections from the ports for the upcoming 2020 RTP.

If you have any questions concerning this information, please feel free to contact me at (213) 236-1994.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rongsheng Luo', written in a cursive style.

Rongsheng Luo  
Program Manager, Air Quality and Conformity

Cc: Heather Tomley, POLB  
Matt Arms, POLB  
Allison Yoh, Ph.D., POLB  
Andrew Brunner, Build America Bureau  
Amanda Ciampolillo, Federal Rail Administration  
Stephanie Perez-Arrieta, Federal Rail Administration  
Michael Enwedo, Caltrans

**Table 1.** Annual Combined Construction and Net Operations Emissions

Evaluation Year	Tons per Year Emissions					
	ROG	NOx	CO	SOx	PM10	PM2.5
2021	0.36	1.13	3.75	0.01	0.27	0.07
2022	3.79	15.28	41.04	0.10	3.85	1.35
2023	1.80	6.55	20.80	0.08	4.13	1.33
2024	2.53	57.99	25.05	0.10	2.86	1.67
2025	2.61	55.61	27.08	0.11	2.89	1.60
2026	2.25	51.06	23.94	0.10	3.12	1.64
2027	2.00	48.40	22.79	0.10	2.69	1.41
2028	1.84	44.98	21.47	0.09	1.92	1.15
2029	1.42	40.40	18.87	0.07	0.78	0.72
2030	1.35	37.56	18.87	0.07	0.71	0.65
2031	1.20	34.73	18.87	0.07	0.71	0.65
2032	1.13	32.60	18.87	0.07	0.64	0.59
2033	1.06	30.48	18.87	0.07	0.57	0.52
2034	0.99	28.35	18.87	0.07	0.50	0.46
2035	0.92	26.22	18.87	0.07	0.50	0.46
General Conformity <i>De Minimis</i> Level	10	10	100	100	100	70

**Table 2.** Daily Combined Construction and Net Operations Emissions

Year	Tons per Day Emissions					
	ROG	NOx	CO	SOx	PM10	PM2.5
2021	0.000986	0.003096	0.010274	0.000027	0.000740	0.000192
2022	0.010384	0.041863	0.112438	0.000274	0.010548	0.003699
2023	0.004932	0.017945	0.056986	0.000219	0.011315	0.003644
2024	0.006932	0.158877	0.068630	0.000274	0.007836	0.004575
2025	0.007151	0.152356	0.074192	0.000301	0.007918	0.004384
2026	0.006164	0.139890	0.065589	0.000274	0.008548	0.004493
2027	0.005479	0.132603	0.062438	0.000274	0.007370	0.003863
2028	0.005041	0.123233	0.058822	0.000247	0.005260	0.003151
2029	0.003890	0.110685	0.051699	0.000192	0.002137	0.001973
2030	0.003699	0.102904	0.051699	0.000192	0.001945	0.001781
2031	0.003288	0.095151	0.051699	0.000192	0.001945	0.001781
2032	0.003096	0.089315	0.051699	0.000192	0.001753	0.001616
2033	0.002904	0.083507	0.051699	0.000192	0.001562	0.001425
2034	0.002712	0.077671	0.051699	0.000192	0.001370	0.001260
2035	0.002521	0.071836	0.051699	0.000192	0.001370	0.001260

**Table 3. Annual Construction Emissions**

Evaluation Year	Tons per Year Emissions					
	ROG	NOx	CO	SOx	PM10	PM2.5
2021	0.36	1.13	3.75	0.01	0.27	0.07
2022	3.79	15.28	41.04	0.10	3.85	1.35
2023	1.80	6.55	20.80	0.08	4.13	1.33
2024	0.55	2.00	6.18	0.03	1.66	0.56
2025	0.77	3.16	8.21	0.04	1.76	0.56
2026	0.48	2.16	5.07	0.03	2.06	0.66
2027	0.37	2.33	3.92	0.03	1.70	0.50
2028	0.35	1.75	2.60	0.02	1.00	0.30
General Conformity <i>De Minimis</i> Level	10	10	100	100	100	70

**Table 4. Annual Net Operations Emissions**

Evaluation Year	Tons per Year Emissions					
	ROG	NOx	CO	SOx	PM10	PM2.5
2024	1.98	55.99	18.87	0.07	1.2	1.11
2025	1.84	52.45	18.87	0.07	1.13	1.04
2026	1.77	48.9	18.87	0.07	1.06	0.98
2027	1.63	46.07	18.87	0.07	0.99	0.91
2028	1.49	43.23	18.87	0.07	0.92	0.85
2029	1.42	40.4	18.87	0.07	0.78	0.72
2030	1.35	37.56	18.87	0.07	0.71	0.65
2031	1.2	34.73	18.87	0.07	0.71	0.65
2032	1.13	32.6	18.87	0.07	0.64	0.59
2033	1.06	30.48	18.87	0.07	0.57	0.52
2034	0.99	28.35	18.87	0.07	0.5	0.46
2035	0.92	26.22	18.87	0.07	0.5	0.46
General Conformity <i>De Minimis</i> Level	10	10	100	100	100	70